



BATH CITY FC FOUNDATION

SAFEGUARDING POLICY

Implementation Date :- December 2020

Review Date :- December 2021

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This policy applies to all staff, including senior managers and the board of trustees, paid staff, volunteers, contractors, sessional workers, agency staff, students or anyone working on behalf of the Bath City FC Foundation.

The purpose of this policy is:

- To protect children and vulnerable adults (collectively referred to as “young people”) who receive BCFC Foundation services. These include the children or adults who use our services. Under the Children Act 1989(2004), a child is legally defined as anyone who has not reached their 18th birthday. See Definitions section for definition of vulnerable adult
- To provide staff, partner organisations and volunteers with the overarching principles that guide our approach to safeguarding and child protection.

The Foundation believe that a young person should never experience abuse of any kind. We have a responsibility to promote the welfare of young people and to keep them safe. We are committed to practise in a way that protects them.

Legal Framework

This policy has been drawn up on the basis of law and guidance that seeks to protect young people, namely:

- The Children Act 1989 (England and Wales)
- The Children Act 2004(England and Wales)
- The Care Act 2014 The Data Protection Act 2018
- The Human Rights Act 1998
- Sexual Offences Act 2003
- Equality Act 2010

The Foundation regards the welfare of young people as highest priority. The Children Act 1989 and 2004 places a duty on organisations to safeguard and promote the wellbeing of young people. Safeguarding is everyone’s responsibility, and everyone is required to adhere to this policy. We acknowledge there is a duty of care and other legal responsibilities surrounding safeguarding. This means that we will ensure that all personnel who work with or on behalf of young people are competent, confident and safe to do so.

- This policy applies to all participants who use BCFC Foundation services, have contact with Foundation members of staff, and are in any other way brought to the attention of the Foundation through any of our services or programmes.
- BCFC Foundation and all Foundation staff shall make safeguarding their highest priority.
- The welfare of young people is paramount and overrides all other policies. All BCFC Foundation staff who come into contact with young people in their work have a duty to safeguard and promote their welfare.
- All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately:

- School programmes

The School’s safeguarding policy will take primacy in relation to the management of any safeguarding incident, however, to safeguard young person, the BCFCF Safeguarding Team may decide to make a referral to other agencies. The BCFCF Safeguarding Team will inform the school of any such referral.

- Community programmes

The Foundation’s safeguarding policy will take primacy in relation to the management of any safeguarding incident. On receiving a referral, the BCFCF Safeguarding Team will inform the

relevant Local Partner (LP) associated with the young person(s) in question. At this stage the LP is expected to take over the safeguarding process, keeping the BCFCF Safeguarding Team informed as appropriate. To safeguard a young person, the BCFCF Safeguarding Team may decide to make a referral to other agencies. The BCFCF Safeguarding Team will inform the LP of any such referral. If the young person is not attached to a known LP or we can't contact them within 24 hours (or less depending on the issue), BCFCF Safeguarding Team would take direct action to process the safeguarding incident. If the LP was uncontactable at the time, the BCFCF Safeguarding Team will inform them of any action take as soon as is possible.

- BCFCF and Foundation staff must never keep concerns about a participant's safety to themselves. All Foundation staff are obliged to report about any concerns about a person's safety as set out within this document.
- The allegation and disclosure protocol below, outlines who will instigate safeguarding procedures and what these procedures will entail.
- The Foundation to ask all partners to share basic information about allegations of abuse (to include names, nature of allegation, roles held and outcome) where:
 - Disclosure made by participant to staff
 - Disclosure is made by a participant and relates to an employee/volunteer of the partner
- The Foundation to ask partners to share Safeguarding concerns which don't relate to inappropriate conduct of a BCFCF staff member but involve a participant on a programme
 - The Foundation and Partner to share information and maintain communication about the notification
 - Foundation to retain an interest in the outcome of the investigation and retain a record of basic information (to include the outcome)
- When working with a LP, the BCFCF will ensure that these organisations have appropriate safeguarding procedures in place.
- The LP will provide a copy of their safeguarding policy to both the Foundation and our workforce and contact details of this designated safeguarding officer (DSO).

We will seek to keep young people safe by:

- valuing them, listening to them and respecting them
- appointing a Designated Safeguarding Officer(s) (DSO) for young people and a lead board member for safeguarding.
- adopting child protection practices through procedures and a code of conduct for staff and volunteers.
- providing effective management for staff and volunteers through supervision, support, safeguarding training (including training on identifying and recognising abuse.) and quality assurance measures.
- recruiting staff and volunteers safely, ensuring all necessary checks are made in line with our safer recruitment processes.
- ensuring all members of the safeguarding team (i.e. DSO's and board lead) to have completed an externally accredited enhanced level of safeguarding training- to enable them to review policies and deal with safeguarding concerns. To be refreshed every 3 years.
- ensuring that anyone delivering safeguarding training to members of staff and have the required knowledge and skill to do so and consider using external companies for additional training.
- recording and storing information professionally and securely.
- using our safeguarding procedures to share concerns and relevant information with agencies who need to know.

- using our procedures to manage any allegations against staff, including senior managers and the board of trustees, paid staff, volunteers, contractors, sessional workers, agency staff, students or anyone working on behalf of Bath City FC Foundation.
- ensure that a written factual record of discussions with the participant is made as soon as possible on BCFCF Safeguarding Record Form of the key details regarding the allegations and the actions taken. The record should be factual and objective in terms of what is reported by the participant and not based on opinions, thoughts or impressions of Foundation staff.
- creating and maintaining an antibullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise.
- ensuring that we have effective complaints and whistleblowing measure in place.
- ensuring that we provide a safe physical environment for our young people, staff, athletes and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance.

Contact details:

Designated Safeguarding Officer (DSO)

Lee Williams

07983975136

Email: LW@youngbristol.com

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Trustees: Helen Donovan (Chair), Joy Saunders, Lee Williams, David Cavaliero, Andy Pitchford, Andy Iles

President: Ken Loach

NSPCC Helpline

0808 800 5000

We are committed to reviewing our policy and good practice annually.

This policy was last reviewed on 10th December 2020

Signed by senior lead for safeguarding.....

Definitions

For the purpose of the child and vulnerable adult protection policy and procedures, the terms below are defined as follows.

4.1 Safeguarding and promoting the welfare of children:

- Protecting children from maltreatment
- Preventing the impairment of children's health or development
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care, and
- Undertaking that role so as to enable those children to have optimum life chances and to enter adulthood successfully.

4.2 A child Under the Children Act 1989(2004), a child is legally defined as anyone who has not reached their 18th birthday. Child protection and legislation and guidance therefore only applies to those users of the DKHT services up to that age. The DKHT will also work with those over the age of 18 and recognises its duty of care to all the young people with whom it works, including vulnerable adults up to 30. England and Wales have fully adopted the above definition of "child", referring to all people under the age of 18. In Scotland, when a young person reaches the age of 16 they are legally classified as an adult. However, under the Children (Scotland) Act 1995, they will still be determined as a child in cases where the child is deemed to be vulnerable or still subject to supervision by the local authorities (criteria outlined in the Adult Support and Protection (Scotland) Act 2007).

4.3 A vulnerable adult

As defined by the Safeguarding Vulnerable Groups Act 2006, a vulnerable adult is defined as a person who is aged 18 years or over and who is:

- living in residential accommodation, such as a care home or residential special school; who may need community care services by reason of mental or other disability, age and illness
- detained in lawful custody and who may be unable to take care of themselves or unable to protect themselves against significant harm or exploitation
- Abuse can affect any vulnerable adult, but particularly someone who is, or may be, unable to protect themselves against significant harm or exploitation, for example:
 - o Older people
 - o People with mental health problems
 - o Disabled people
 - o People with learning difficulties
 - o People with acquired brain damage
 - o People who misuse substances.

4.4 Child protection

Child protection is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or at risk of suffering, significant harm.

Definitions of Abuse

(As defined by the Department for Education and Children Act 1989 and 2004 and Care Act 2014)

- **Physical abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child or adult. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child or adult and also if inappropriate restraint is used.

Physical abuse, as well as being a result of an act of commission can also be caused through omission or the failure to act to protect.

- **Emotional abuse** can involve threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

In the Children Act 1989 it is defined as the persistent emotional ill-treatment such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. Some level of emotional abuse is involved in all participants of ill treatment of a child or adult, though it may occur alone.

- **Sexual abuse** including rape and sexual assault or sexual acts to which the person has not consented or could not consent or was pressured into consenting. It involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening.

They may include involving children in looking at, or in the production of, pornographic material, or encouraging children to behave in sexually inappropriate ways.

- **Neglect** is the persistent failure to meet basic physical, medical and/or psychological needs, likely to result in a serious impairment of the health or development. Neglect is also failure to provide access to appropriate services and the withholding of the necessities of life, e.g. nutrition, medication and heating.

Neglect may occur during pregnancy as a result of maternal substance abuse.

- **Financial Abuse** including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits
- **Discriminatory Abuse** including racist, sexist, that based on a person's disability, and other forms of harassment, slurs or similar treatment.
- **Institutional Abuse** may take the form of isolated incidents of poor and unprofessional practice at one end of the spectrum, through to pervasive ill treatment or gross misconduct at the other.
- **Domestic Abuse** - the Government defines domestic violence as "Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse (psychological, physical, sexual, financial or emotional) between people aged 16 years or over who are or

have been intimate partners or family members, regardless of gender or sexuality." This includes issues of concern to black and minority ethnic (BME) communities such as so called 'honour-based violence', female genital mutilation (FGM) and forced marriage.⁷

Where there is evidence of domestic violence, the implications for any children in the household should be considered, including the possibility that the children may themselves be subject to violence, or may be harmed by witnessing or overhearing the violence.

- **Forced Marriage** is a marriage in which one or both spouses do not (or, in the case of some adults at risk, cannot) consent to the marriage and duress is involved. Duress can involve physical, psychological, financial, sexual and emotional pressure.
- **Honour- based Violence** – The term “honour crime” or “honour-based violence embraces a variety of crimes of violence (mainly, but not exclusively against women), including assault, imprisonment and murder where the person is being punished by their family or their community.

Other issues to be aware of:

- **Bullying** is deliberately hurtful and harmful behaviour, often repeated over a period of time and from which it may be difficult to defend. Bullying may take many forms, including: physical attacks, verbal (which would include name-calling, threats, racist or homophobic remarks) and emotional (for example, isolating an individual from the activities and social acceptance of others). Cyberbullying involves making use of social media, internet, the mobile phones or any other electronic device used to communicate with, to taunt, intimidate or threaten.
- **Child Sexual Exploitation (CSE)**. The sexual exploitation of children and participants is a form of child sexual abuse. Working Together to Safeguard Children and the National Working Group for Sexually Exploited Children and Participants define sexual exploitation as:

“Sexual exploitation of children and participants under 18 involves exploitative situations, contexts and relationships where participants (or a third person or persons) receive ‘something’ (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities.”

Sexual exploitation can take many forms from the seemingly ‘consensual’ relationship where sex is exchanged for attention, affection, accommodation or gifts, to serious organised crime and child trafficking. What marks out exploitation is an imbalance of power within the relationship. The perpetrator always holds some kind of power over the victim, increasing the dependence of the victim as the exploitative relationship develops.

Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from their peers to have sex, sexual bullying (including cyber bullying), and grooming for sexual activity. Technology can also play a part in sexual abuse, for example, through its use to record abuse and share it with other like-minded

individuals or as a medium to access children and participants in order to groom them. A common factor in all cases is the lack of free economic or moral choice.

County Lines

CL is a term used to describe gangs, groups or drug networks that supply drugs from urban to suburban areas across the country, including market and coastal towns, using dedicated mobile phone lines or 'deal lines'. They exploit children and vulnerable adults to move the drugs and money to and from the urban area, and to store the drugs in local markets. They will often use intimidation, violence and weapons, including knives, corrosives and firearms. CL is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons; and the response to tackle it involves the police, the National Crime Agency, a wide range of Government departments, local government agencies and voluntary and community sector organisations. CL activity and the associated violence, drug dealing and exploitation has a devastating impact on young people, vulnerable adults and local communities.

Spotting the signs

A young person's involvement in CL activity often leaves signs. A young person might exhibit some of these signs, either as a member or as an associate of a gang dealing drugs. Any sudden changes in a young person's lifestyle should be discussed with them. Some indicators of CL involvement and exploitation are listed below, with those at the top of particular concern:

- Persistently going missing from school or home and / or being found out-of-area;
- Unexplained acquisition of money, clothes, or mobile phones
- Excessive receipt of texts / phone calls
- Relationships with controlling / older individuals or groups
- Leaving home / care without explanation
- Suspicion of physical assault / unexplained injuries
- Parental concerns
- Carrying weapons
- Significant decline in school results / performance
- Gang association or isolation from peers or social networks
- Self-harm or significant changes in emotional well-being

What is cuckooing?

- Drug dealers use 'cuckooing' methods to target the most vulnerable individuals in our society.
- Cuckooing may be happening in your area and we want you to know what it is, how to spot the signs and what to do;
- Cuckooing happens when a drug-dealer befriends, blackmails, or extorts a vulnerable person who often lives alone - such as someone old, or someone with a drug addiction - then takes over their home and uses it as a place to sell drugs from;
- The drug dealers then 'pay' the victim with drugs, usually crack cocaine and heroin, in exchange for staying at their home. Dealers sometimes also use the home as payment for a debt owed to them by the occupant;
- They then use the home to run their CL drugs operation from, putting the occupant and consequently the local community at risk of violence;

Spot the signs of cuckooing:

- Other people seen inside the house or flat who don't normally live there
- People coming and going from the property
- More taxis and cars than usual appearing at the property
- Not seeing the person who lives there as frequently
- When you do see the occupant, they may appear anxious or distracted
- Seeing drugs paraphernalia near to the property

If you spot any of these signs you can speak to local police on 101 or call 999 in an emergency. If you'd rather stay anonymous you can call the independent charity Crimestoppers on 0800 555 111.

Prevent

Preventing radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism.

What is extremism?

Extremism is defined in "Keeping children safe in education" (2015) 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... calls for the death of members of our armed forces, whether in this country or overseas.'

Any idea or belief can become extreme:

- Political Extremism
- Environmental Extremism
- Animal Rights Extremism
- Religious Extremism

These views may pose a threat to certain groups in society and may or may not, become violent.

What is the Prevent duty?

The Prevent duty was introduced as part of the Counter-Terrorism and Security Act 2015. It requires schools, councils, prisons, police, health bodies, colleges and universities to have 'due regard to preventing people from being drawn into terrorism'. Frontline staff in key sectors, including sport, have a significant role to play.

What does this mean?

As an organisation working with children and participants, organisations should:

- Ensure they have robust safeguarding policies and procedures.
- Inform staff and volunteers of what might constitute signs of radicalisation
- Clear guidelines about who to report concerns to.
- Ensuring that there is no access to terrorist or extremist materials available at or through the sport.

Where a member of staff has any concerns about the risk of possible or actual radicalisation of an individual, then (s)he is required to report that immediately to a Designated Safeguarding Officer. They will then refer the concern via CHANNEL, which uses existing collaboration between local authorities, statutory partners, the police and the local community to identify individuals at risk of being drawn into terrorism, assess the nature and extent of that risk and develop the most appropriate support for the individuals concerned.

Who should concerns be referred to?

Concerns can be reported through several channels:

- The Anti-Terrorism Hotline – 0800 789321 – for immediate concerns
- www.gov.uk/report-terrorism - for reporting of non-emergency information
- CHANNEL is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.

This protocol is for use by Bath City FC Foundation staff and volunteers and all organisations involved with Foundation programmes.

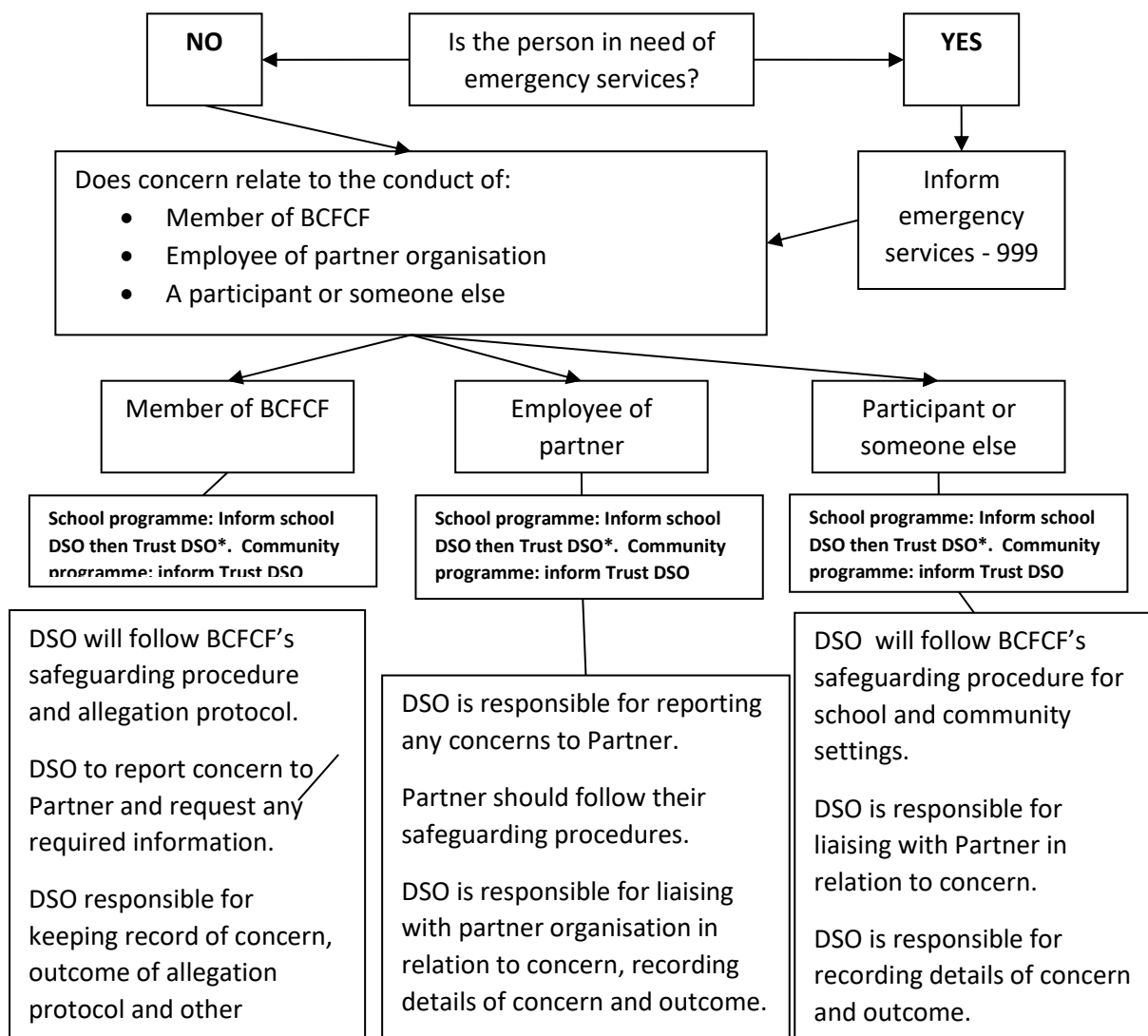
Disclosure protocol

Member of BCFCF has a safeguarding concern about a participant OR becomes aware of a safeguarding concern through a Local Partner

Participant discloses information relating to safeguarding to a member of BCFCF

Member of staff should deal with concern in accordance with safeguarding training and best practice:

- Stay calm and approachable
- Listen carefully without interrupting
- Keep questions to a minimum. Only ask questions where information is needed for clarification. Do not ask leading or probing questions.
- Under no circumstances make promises of confidentiality or a certain outcome. Let the individual know what will happen next / who this will be reported to.
- As soon as possible record (in writing) all details of what was said including the individual's precise words where possible. Record details of names, dates, times.



COMPLETE IMMEDIATELY

***Safeguarding team:**
 Lee Williams :- **07983975136**
 Email: LW@youngbristol.com

Allegation Protocol

This protocol is for use by Bath City FC Foundation staff and volunteers and all organisations involved with Foundation programmes.

A formal safeguarding allegation is made in relation to the conduct / behaviour of a member of BCFCF

BCFCF becomes aware of conduct or behaviour by a member which gives rise to serious safeguarding concerns

- Member of BCFCF to be suspended immediately whilst investigation is ongoing
- Where police investigations / criminal proceedings are ongoing the member will remain suspended until police investigations / criminal proceedings have concluded
- Whilst member is suspended they will be unable to take part in any BCFCF programmes or carry out any work or activities on behalf of BCFCF (either paid or unpaid)

DSO will be responsible for reporting any allegations or concerns to LADO / Police/ MASH / Adult Social Services as required

Within 1 working day LADO / MASH / Adult Social Services should be made aware of any allegations that an Athlete / member has:

- Behaved in a way that has harmed a child / young person, or may have harmed a child / young person
- committed a criminal offence against or related to a child / young person; or
- behaved towards a child / young person in a way that indicate that he/she is unsuitable to work with children or young people.

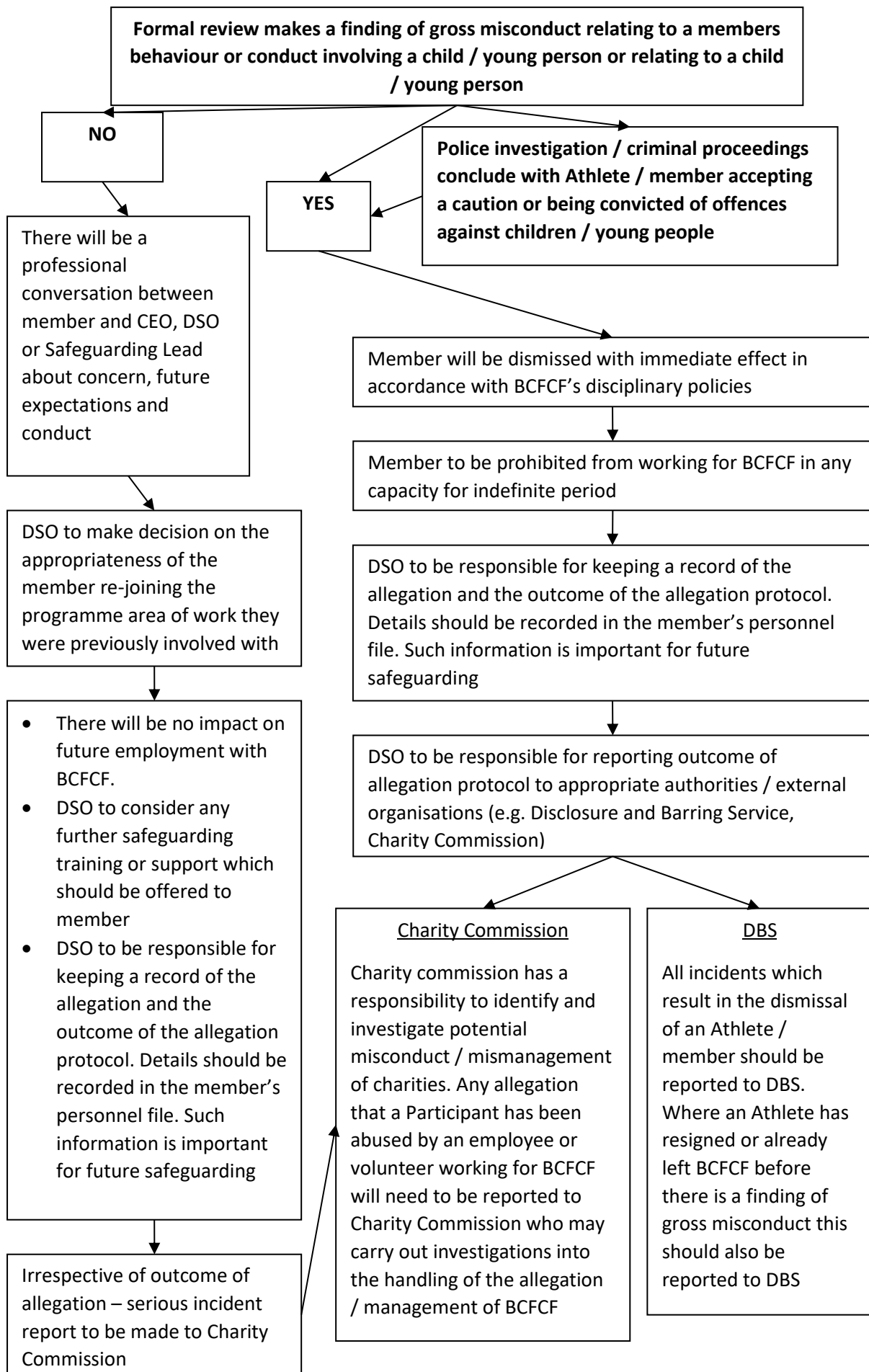
LADO / MASH / Adult Social Services will provide advice and guidance on investigating the allegation and liaising with police in relation to the allegation

- No internal formal review or disciplinary processes will be carried out whilst police investigations / criminal proceedings are ongoing
- BCFCF will co-operate fully with police during any investigations including sharing of appropriate records and information

Once any police investigation / criminal proceedings have concluded:

- BCFCF will carry out an internal formal review ***in accordance with BCFCF's disciplinary policies***. DSO will be responsible for leading any formal review
- Formal review will be carried out in a fair and timely manner
- The member should be given the opportunity to be supported by a friend, colleague or trade union representative who is not connected to the investigation.
- The formal review should provide a right of appeal
- ***For full details refer to BCFCF's disciplinary procedures***

If a Formal Review has taken place:



BCFCF approach to safe delivery of virtual programmes

Guidance

- BCFCF to provide suitable platforms for staff to use. Under no circumstances should any platform not designated by the BCFCF be used to engage with participants.
- Staff should not have access to young people's phone numbers or email addresses. Nor should young people have access to staff details.
- All virtual sessions to be arranged through Local Delivery Partner or School or via Foundation Zoom account or other Foundation designated platform.
- All group sessions should have at least two delivery staff (from DKHT and/ or Local Delivery Partner/ School) attending and participating.
- All one to one sessions should have two delivery staff (from BCFCF and/ or Local Delivery Partner/ School). Where this isn't possible or suitable, the staff member must: provide the following immediately after the session to BCFCF:
 - Initials of young person
 - Date & Time (*note: we need this info regardless of who is on the call*)
 - Summary of discussion
- Staff to wear BCFCF t-shirt and ID Badge when conducting virtual sessions.
- Staff to consider environment for Zoom calls. They should not be conducted from a bedroom or have inappropriate items in shot. We also recommend family pictures and other items which may provide further details on your personal life should not be visible.
- Staff to ensure that participants have WIFI before starting, using 3G/4G will be very costly.
- Do not record any virtual sessions.
- Staff to disable any chat function within virtual sessions, unless the group have agreed to use it appropriately.

Facebook guidance

- The Foundation may set up a BCFCF owned and monitored private Facebook account for your programmes. You must only use a BCFCF set up and owned Facebook account to communicate with your group. You will receive an invite to join via your professional profile. If you do not have a professional account, you can create one for free on Facebook. Don't include any more information than you would share with young people in real life on your professional account.
- Staff member will be set up as Moderator within the group.
- Each group will have a Foundation staff member as well.
- Do not accept friend requests from young people.
- Ensure all communication is to the whole group (there is a function to message individuals within the group – please don't use this).
- As with normal programmes, setting rules at the start for group interactions is recommended.
- Ensure young people are aware that the group is not monitored 24/7 and therefore is not the place to ask for help.

Promoting good practice

Principles of Good Practice

1. The welfare of the participants is paramount
2. Promote a culture in which all participants listen to and respect as individuals
3. Ensure that the Foundation's programmes are engaging, and that fair play is promoted
4. Challenge unacceptable behaviour
5. Report all concerns regarding unacceptable behaviour
6. Report all allegations/suspicions of abuse

Implementing Good Practice

To minimise the risk to children, young people and adults at risk the programmes will:

1. Ensure there is a person-centred approach which includes consultation and listening to participants opinions and issues
2. Follow the Foundation's policy and guidelines on recruitment and ensure that all individuals working with participants are screened, have the appropriate training/skills and attributes.
3. Ensure there are appropriate induction process is in place for new staff, athletes and volunteers
4. Ensure all staff and volunteers have access to appropriate and relevant education and training.
5. Appoint and publicise the name of the Designated Safeguarding Officers, who will be able to support and guide staff, volunteers, participants and parents on the issues and implementation of safeguarding, welfare and good practice
6. Follow the Foundations's Anti-Harassment and Bullying Policy, ensuring that this is publicised, and all staff, athletes and volunteers understand the policy – please see the Trusts website for the most recent copy of this policy.
7. Ensure that all staff, volunteers and participants and parents comply with the Foundations's Codes of Conduct.
8. Adopt good practice policies and processes for:
 - a. Working with young people
 - b. Changing
 - c. Dropping off and collecting participants at the programme (incl. Transporting participants)
 - d. Supervision of and communication with Participants
 - e. Photography and use of images
9. Regarding referrals to the Designated Safeguarding Offices/Lead:
 - a. Ensure you follow the disclosure protocol flow diagram within this policy document
 - b. All handwritten notes and any other recording along with a timeline must be securely retained.

- **Good Practice when working young people:**

- ✓ Always work in an open environment – avoid private or unobserved situations. Encourage an open environment (e.g. no secrets)
- ✓ Treat all people equally, and with respect and dignity
- ✓ Always put the welfare of each person first – before winning or achieving goals
- ✓ Maintain a safe and appropriate distance and professional relationships with participants (e.g. it is not appropriate to have an intimate relationship with any participants or to share a room with them)
- ✓ Build balanced relationships based on mutual trust which empowers people to share in the decision-making process
- ✓ Ensure that if any form of manual / physical support is required, it should be provided openly and according to guidelines provided by the school or organisation.
- ✓ If sports coaching, be aware that care is needed as it is difficult to maintain hand positions when the child is constantly moving. Participants should always be consulted, and their agreement gained.
- ✓ Keep up to date with the technical skills, qualifications and insurance in order to continue to deliver to participants.
- ✓ Involve parents / carers wherever possible, e.g. for the responsibility of their children in the changing rooms. If groups have to be supervised in the changing rooms, always ensure parents / carers / teachers / officials work in pairs.
- ✓ Ensure that any residential, adults should not enter or invite any participants into their rooms
- ✓ Be an excellent role model – this includes not smoking or drinking alcohol in the company of participants.
- ✓ Give enthusiastic and constructive feedback rather than negative criticism.
- ✓ Recognise the developmental needs and capacity of the participants – avoid excessive training or competition and not pushing them against their will or beyond their capabilities.

Practice 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 organisation or the child's parents. For example, a child sustains an injury and needs to go to hospital, or a parent fails to arrive to pick a child up at the end of a session.

- ✗ Avoid spending time alone with participants away from others
- ✗ Avoid taking participants alone on car journeys, however short

The following should never be sanctioned. You should never:

- ✗ Engage in rough, physical or sexually provocative games, including horseplay
- ✗ Share a room with a participant
- ✗ Allow or engage in any form of inappropriate touching
- ✗ Take participants to your home where they will be alone with you
- ✗ Allow participants to use inappropriate language unchallenged
- ✗ Make sexually suggestive comments to a participant, even in fun
- ✗ Fail to act on and record allegations made by a participant
- ✗ Do things of a personal nature for any participant they can do for themselves
- ✗ Constantly shout at and taunt a participant
- ✗ Use inappropriate language

Be Aware:

- There is a need to be responsive to a person's reactions. If a person is fully dependant on you, talk with him / her about what you are doing and give choices where possible. This is particularly so if you are involved in any dressing or undressing of outer clothing, or where there is physical contact, lifting or assisting a child to carry out particular activities. Avoid taking on the responsibility for tasks for which you are not appropriately trained.
- If you accidentally hurt a person, he / she seems distressed in any manner, appears to be sexually aroused by your actions, or misunderstands or misinterprets something you have done, report any such incident as soon as possible to another colleague and make a brief written note of it. Parents or carers should be informed of the incident.

• Good Practice – Changing

- ✓ Participants aged 11 and under must be supervised at all times in changing rooms by two members of staff, of the same gender as the participants.
- ✓ Adults, working with young teams, including, volunteers or staff, should not change or shower at the same time using the same facility as participants.
- ✓ If adults and participants need to share a changing facility, the Foundation must have consent from the parents that their child/children can share a changing room with adults and be made aware of the Foundation's guidelines for good practice.
- ✓ If younger participants need to share changing facilities with adults, their parents should be allowed to supervise them whilst they are changing.
- ✓ If participants are uncomfortable changing or showering in public, no pressure should be placed on them to do so. Encourage them to do this at home.
- ✓ If the programme has disabled participants involve them and their carers in deciding how, if applicable, they wish to be assisted to change and ensure they provide full consent to any support or assistance required
- ✓ The use of mobile phones should be banned from the changing rooms
- ✓ Photographs and any other media are strictly banned from changing rooms.

• Good Practice Dropping off and collecting participants at the programme**Transportation:**

- ✓ Local partner or school will be responsible for participants in their care.
- ✓ Assess whether the offsite activity is necessary and practical.
- ✓ Seek permission from the host organisation to transport the participants off site.
- ✓ Use transport provided by the LP in the first instance.
- ✓ Use public transport in the second instance.
- ✓ It is not the staff or volunteer's responsibility to transport the participants to and from the programme.
- ✓ The LP or staff will provide the parents/carers with a contact number which may be used if the parent/carer will be late to collect their child/children
- ✓ The Foundation or LP will ask the participant/parents/carer to complete a form providing contact details, information about their child/children i.e. medical details etc.

Late Collection:

If a parent /carer is late the Foundation will:

- ✓ Attempt to contact the parent/carer.
- ✓ Check the programme contact number for any information regarding the participants.
- ✓ Wait with the participants, at the programme venue, wherever possible with other staff / volunteers or parents. This should be done until a resolution has been found.
- ✓ If parents/carers remain un-contactable staff will need to report the situation to Children's Social Care or the Police.

In emergencies staff and volunteers are permitted to use their own car, providing they:

- ✓ Contact the Foundation for signoff, before the session.
- ✓ Obtain additional permission from the LP.
- ✓ Notify LP and the Foundation of anticipated time of departure and time of your arrival.
- ✓ Text the Foundation when you have arrived at your destination.
- ✓ You MUST have the appropriate business insurance.

Practice to be avoided – Staff and volunteers should not:

- ✗ Remove a participant from the hosts' site without host permission.
- ✗ Transport a participant via a method that has not been approved.
- ✗ Send a participant home with another person without permission or consulting another member of staff.
- ✗ Transport a participant in your car without permission from The Foundation and LP.
- ✗ Leave a participant in your car unsupervised.

• **Good Practice - Supervision of and communication with participants:**

- For participants over the age of 8 – the ratio of adults to young people is a minimum 1:10
- For participants under the age of 8 government guidance outlined in the Care Standards Act 2000 should be followed
- All venues should have First Aid provision by ensuring:
 - ✓ There is a qualified First Aider on site
 - ✓ First Aid boxes are up to date and accessible
 - ✓ There is access to a phone to be able to contact the emergency services if required
- All communication with young people should be through the LP, Foundation or the School and between the hours of 9am-5pm
- All methods of communication e.g. snapchat/messenger, email etc....are prohibited

Images and Social Media

When using digital images staff should inform and educate participants about the risk associated with taking, sharing, publicising and distributing them. They should recognise the risks attached to publishing their own images on the internet, including social networking sites.

- Staff and volunteers are allowed to take digital / video images to support their work but must follow the Foundation policies including obtaining informed consent. These images are allowed to be taken on personal equipment but must always be in a professional manner.
- Digital and video images should be passed to the communications team promptly and then deleted from personal equipment immediately.
- Care should be taken when taking images that participants are appropriately dressed and are not participating in activities that might bring the participants or the Trust into disrepute.
- Participants, staff, athletes and/or volunteers must not take, share, publish or distribute images of others without their written permission.
- Photographs publicised on the Trust website, or elsewhere must be selected carefully and comply with good practice guidelines on the use of such images.
- Parents / carers permission should be obtained at all times for participants under the age of 16 years.

Why use social media:

The widespread use of social media brings opportunities to understand, engage and communicate with participants and practitioners in new ways, it is important that we use these technologies effectively and flexibly.

How to use social media safely:

There are 3 basic online identities

- Personal
- Professional
- Organisational

By modelling good practice in your own engagement with the internet you can support participants to be safe, and to engage positively. All staff and volunteers working for the Foundation need to model the positive use of technologies.

If you have a professional / work profile on the internet, make sure your profile clearly explains;

- who you are,
- who you work for,
- how participants can verify your identity
- offer links to summaries of any relevant policies and information participants should be aware of (i.e. who to contact if any concerns/complaints about your activities on site)
- always be honest about any limits to your engagement online (i.e. I can't offer one to one advice here, but you can contact XYZ if you want someone to talk to)

Bullying in any form is unacceptable and with new technologies comes a new form of bullying, cyberbullying. Cyberbullying is no different from any other forms of bullying; the behaviour is the same and the impact is no less devastating. Cyberbullying is the term used to define bullying

behaviour that takes place via mobile phone or over the internet through emails, instant messaging and social networking sites

Friend Requests – if you have a personal social networking account – **do not** ‘friend’ participants or add them to your contact list. You may be giving them access to personal information and allowing them to contact you inappropriately. They may also be giving you access to their personal information and activities without realising it.

Groups – You must only communicate with your group through platforms established by BCFCF, following BCFCF guidelines. See BCFCF approach to safe delivery of virtual programmes section for more details.

Be a good ambassador. Whilst it is everyone’s personal decision whether to use social media networks and tools you should always be aware that your behaviour and opinions reflect on the Trust.

Before you post anything on the internet at work or at home, ask yourself these questions;

- Could this public expression impair my ability to work with my colleagues on a friendly basis?
- Would it make my colleagues uncomfortable?
- Would it make participants uncomfortable?
- Would it make parents / carers / other professional uncomfortable?
- Could it damage the reputation of my organisation?

Always express ideas and opinions in a respectful manner, make sure your communications are in good taste, be sensitive about linking to content and do not denigrate or insult others, including competitors

Protect confidential information, yourself and your organisation:

Online postings and conversations are not private. Realise that what you post will be around for a long time and could be shared by others.

- Avoid identifying and discussing others – including other organisations, your friends and co-workers – unless you have their permission
- Obtain permission before posting pictures of others, or before posting copied information.
- Externally communicating sensitive, confidential or financial information that is not intended for the public including; information related to specific projects / sessions, participants, partners, funders, partnership deals, funding bids, salary etc.) is ALWAYS forbidden and may be grounds for immediate dismissal and legal action.
- Posts should not speculate on The Foundations future plans, funding bids, recruitment or business prospects.

Personal Information - Astute criminals can piece together information you provide on different sites and then use it to impersonate you or someone you know – or even re-set your passwords.

Don't be fooled. If you do post personal information on a site like Facebook or Twitter, criminals can use it to send you emails that appear to come from a friend or other trusted source – even the site itself. Don't click links or attachments unless you trust the source.

Disclaimer If you have a blog / social media presence and talk about work-related issues, add a disclaimer; to each page making clear that the views you express are your alone. Be aware that the disclaimer does not free you from the obligations under the Codes of Conduct policy.

Use a respectful Tone You may not post any material that is obscene, defamatory, profane, libellous, threatening, harassing, abusive, hateful or embarrasses another person. This includes but is not limited to comments regarding our organisational name, our employers, partners and competitors. You may not personally attack fellow employees, customers, stakeholders, management committee members, managers or participants.

Be transparent. It is important to keep distinct lines between your personal and professional life in the online world. Even when you are talking as an individual, people may perceive you to be talking on behalf of (organisation). It may be appropriate to add a disclaimer as above.

LOGO's. Only those authorised by the Bath City FC Foundation may use the organisation's logos in communications, so be sure you do not include this in your personal blogs or postings.

Speak the truth. If you are in a discussion that relates to The Foundation don't make unsubstantiated claims about features or performance. If you need to respond or make a comment on something specific, verify details through your line manager. Also, because situations change, make sure references or sources of information are current.

Keep your cool. One of the aims of social media is to create dialogue, and people won't always agree on an issue. When confronted with a difference of opinion, stay cool. Express your points in a clear, logical way. Sometimes, it's best to ignore a comment and not give it credibility by acknowledging it with a response.

Stay timely. Part of the appeal in social media is that the conversation occurs almost in real time. So, if you are going to participate in an active way, make sure you are willing to take the time to refresh content, respond to questions and update information regularly, and correct information when appropriate.

Purpose of using social media

- To allow participants to use and access modern technology and methods of communication of their choice
- To provide a means of communicating with other participants in their project and contributing to discussion and decision making regarding their project
- To promote outcomes for participants, including enjoyment and achievement and making a positive contribution
- To provide a means of children and participants accessing information relating to their project, the wider community and beyond

Principles of using social media

- We will reflect and reinforce our core values through the use of social media
- We will evidence our compliance with relevant legislation in relation to social media
- The use of social media will allow us to communicate with participants through a medium of their choice
- The use of social media will allow us to share information appropriately and safely with participants
- We can reinforce and provide evidence of good practice in our use of social media
- Using skilled staff to support the use of social media will help safeguard participants
- Using social media will ensure that we remain accountable to service users, funders and commissioners for the way in which we provide services
- Social media aimed at practitioners should be set up separately to be aimed at participants.

Responsibilities.

Staff and managers will ensure that:

- Service users are informed of The Foundation's policies relating to this area of work
- Any participants utilising The Foundation or Bath City FC media team are above the legal age limit of 13 as upheld by all social media providers
- The Foundation will work with the LP to promote e-safety to participants and their parents/carers.
- Skilled workers will be responsible for overseeing the development and implementation of a social media presence in our organisation.

- Skilled workers will take responsibility in any project for monitoring and moderating web pages
- Skilled workers will have the authority to remove offensive or inappropriate content
- Skilled workers will take responsibility for responding to any safeguarding concerns arising out of participants use of social media, including cyber-bullying and report any concerns to their manager immediately.
- There will be clear report abuse features linked to the CEOP (Child Exploitation Online Protection) report abuse service for any social media page developed within a project
- Any social media pages developed will adhere to (organisation) branding guidelines including use of logos, colour schemes, layout etc.
- Information posted by staff will be accurate, relevant, updated regularly and removed where necessary
- Project information for participants and their parents will include information about their safe use of technology and social media.

Adopting Best Practice

By adopting the points highlighted in these guidelines, The Trust will be putting into place the best possible practice to protect children/participants wherever and whenever photographs and recorded images are taken and stored.

These guidelines focus on the following **key areas**:

1. The publishing of photographic and/or recorded images of participants
2. The use of photographic filming equipment on The Foundations programmes

3. The use of video equipment as a promotional material/coaching aid

And adopt the following **key principles**:

- The interests and welfare of participants taking part on programmes are paramount
- Parents/carers and participants have a right to decide whether their images are to be taken, and how those images may be used
- Parents/carers and participants must provide written consent for their images to be taken and used
- Images should convey the best principles and aspects of the programme, such as fairness and fun
- Care should be taken to ensure that images are not sexual or exploitative in nature, nor open to obvious misinterpretation and misuse
- Images should only be taken by authorised persons, as agreed in the protocol for a particular event/ programme
- All images of participants should be securely stored
- In the case of images used on websites, particular care must be taken to ensure that no identifying details facilitate contact with a child by a potential abuser

Publishing Images - Easy Rules to Remember:

- Ask for written permission from the participant and parent/carer/s to take and use their image. This ensures that they are aware of the way the image is intended to be used to represent the sport/programme. The Consent Form is one way of achieving this.
- If the participant is named, avoid using their photograph
- If a photograph is used, avoid naming the participant. And NEVER publish personal details (e.g. email addresses, telephone numbers, addresses etc.) of a participant
- Only use images of participants in suitable dress to reduce the risk of inappropriate use.
- Try to focus on the activity rather than a particular child and where possible use photographs that represent the broad range of participants taking part in the programme.
- Ensure that images reflect positive aspects of participants involvement in the programme (enjoyment/competition etc.)

Use of Photographic Filming Equipment at the Foundation's Programmes

Bath City FC Foundation does not want to prevent parents, carers or other spectators being able to take legitimate photographs or video footage of participants. However, there is evidence that certain individuals will visit events to take inappropriate photographs or video footage of participants. All athletes, staff and volunteers should be vigilant about this possibility. Any concerns during a programme should be reported to the DSO.

During a programme:

- Participants or parent/guardian (depending on age) will sign a consent form to use their image
- This image can then be used for the next two years
- After this time further consent is required from the participant to continue to use this image
- If consent is not given the image will be permanently deleted

- At any time, participant can withdraw the use of their image. If the image is already in the public domain then the Foundation has no obligation to withdraw this, but the image will be no longer used by the Foundation

Position of Trust

All adults who work young people are in a position of trust that has been invested in them by the parents / carers, LP, Schools, BCFC Foundation and the participant. This relationship can be described as one in which the adult member (staff or volunteer) is in a position of power and influence by virtue of their position.

The borrowing or lending of money between staff and volunteers with participants and or the giving or receiving of gifts is strictly not allowed and should be reported immediately.

Sexual intercourse or touching by an adult with a participant under the age of 16 years is unlawful, even where there is apparent consent from the participants. A consensual sexual relationship between an adult in a position of trust, within the BCFC Foundation setting, and any participants or past participants is strictly prohibited, regardless of age and apparent consent.

In all of the programmes we delivery, adults are deemed to be in a position of trust and must recognise that there are certain boundaries between the staff and volunteers and the participant which must not be crossed in terms of the relationship with the participant. Any relationship that goes beyond the bounds of a professional relationship could be perceived as an abuse of trust and is contrary to this policy. If this were to happen, the Foundation would invoke the appropriate legal and disciplinary procedures.

Foundation staff and athletes must not encourage a physical or emotionally dependant relationship to develop between any person in a position of trust, and a participant.

All those within the Bath City FC Foundation organisation, have a duty to raise concerns about the behaviour of staff, partners and volunteers which may be harmful to the participants or any participant in their care, without prejudice to their own position.

No physical or emotionally dependant relationship should ever be formed with a participant or previous participant of any of our programmes.

Safer Recruitment

- Bath City FC Foundation will not discriminate unfairly against applicants with a criminal record. Having a criminal record will not necessarily bar an applicant from working for the Trust. However, the nature of a disclosed conviction and its relevance to the role in question will be considered and action will be taken as necessary to protect children and vulnerable adults and the good reputation of the Foundation.
- The Foundation must obtain 2 references, at least 1 of which should be able to discuss the applicant's previous employment or volunteer work, before offering the applicant a position. Any discrepancies, including gaps in employment history, in an applicant's application or C.V. must be addressed with the applicant.
- The Foundation must specify within the job description of the position being advertised what the role requires in regard to safeguarding requirements including DBS and Basic Checks and Safeguarding training.

- All applicants should be interviewed before being offered a role with the Foundation. The interview should be carried out by at least 2 people from the Foundation (one of whom has knowledge and training in safeguarding and child protection matters) and should include specific questions about child protection issues and scenarios.
- The Foundation must cross reference any records of professional misconduct before individuals applying for a role with the Trust have been confirmed.
- The Senior Management team must ensure that staff and volunteers they recruit or appoint receive induction on the Foundation's Safeguarding Policy and Procedures.
- All Foundation personnel are required to read this Policy and Procedure and to act at all times in a way that is consistent with these documents and with relevant legislation.
- All Trust front line delivery personnel must attend regular safeguarding training. Managers and supervisors must ensure that they are up to date with the latest developments in safeguarding.
- All Foundation personnel must be made aware of the Safeguarding Policy and Code of Conduct when being inducted.
- Annual training will be provided with an online refresher course for those who require it.
- All Designated Safeguarding Officers must undertake further training, conversant with the nature of the DSO's role and update their Safeguarding knowledge on a regular basis.

Alcohol and Drugs

The use of illegal drugs (to include legal highs and any drugs used for recreational purpose rather than medical) is prohibited whilst athletes/staff are in the presence of, or responsible for, participants/young people

- It is forbidden for athletes/staff to consume alcohol whilst in the presence of, or whilst responsible for, participants/young people
- If an athlete/staff member is believed to be under the presence of alcohol or drugs whilst supervising or delivering programmes to participants/young people, they will be asked to leave the premises immediately
- Athletes/staff are prohibited from ever sharing with, providing or distributing alcohol or illegal drugs (to include legal highs) to participants/young children

Code of conduct and ethics

We are committed to safeguarding and promoting the well-being of all participants, staff and volunteers associated with all Foundation programmes. It is important that all those involved should at all times, show respect, and understanding for the welfare of others. The essence of good ethical conduct is summarised below and anything that falls outside of this is directly linked to our disciplinary procedures.

- Respect the right's, dignity and worth of every person and will treat everyone equally within the context of them taking part in activities regardless of age, ability, gender, race, ethnicity, religious belief, sexuality or social/economic status
- Consider the wellbeing and safety of participants before the development of performance.
- Develop an appropriate working relationship with participants based on mutual trust and respect.

- Make sure all activities are appropriate to the age, ability and experience of those participating and ensure that all those taking part are prepared physically and mentally when learning new skills.
- Display consistently high standards of behaviour and appearance, dressing suitably and not using inappropriate language at any time.
- Never exert influence over participants to obtain personal benefit or reward.
- Never condone rule violations.
- Always report any incidents, referrals or disclosures immediately following appropriate guidelines set out in the Foundations Safeguarding Policies and Procedures.
- Ensure that confidential information is not divulged unless with the express approval of all those concerned.
- Ensure that staff / participant ratios are maintained.
- Ensure that all issues/complaints go through the approved channels.
- Ensure neutrality in all activities.
- Arrive in plenty of time to set up activities and ensure that risk assessments are undertaken.
- At the outset clarify with participants (and where appropriate) their parents/carers exactly what is expected of them of what they can expect from you.
- Never transport participants in your own vehicle and will not arrange transportation for participants in private vehicles.
- Never communicate inappropriately with participants by email, text, phone or social media.
- Never accept friend requests on social media platforms with participants.
- Be aware that discriminatory, offensive and violent behaviour will not be tolerated, and all complaints will be acted upon.
- Build balanced relationships based on mutual trust which empowers participants to share in the decision-making process.
- Maintain a clear boundary between friendship and intimacy with participants and do not conduct inappropriate relationships with participants.
- Never enter into a physical or emotionally dependant relationship should ever be formed with a participant or previous participant of any of our programmes.

I (Please print name) agree to abide by the above Code.

Signed.....Date.....

Safeguarding Reporting Form

This form is used for reporting internally any suspicions and disclosures of possible abuse, concerns for participants welfare and any issues regarding poor practice. Please complete with as much information as possible. This information will be treated in confidence, and only shared with the Local Delivery Partner and with appropriate agencies.

When completing this template please keep the following in mind:

- Write in third person
- Write the exact words that young person used
- It is ok to take notes during a disclosure

BATH CITY FC FOUNDATION Reporter Details

Name	
Contact details	
Date/time of report	

Subject(s) Details

Name, gender, date of birth of subject	
Current Address	
Postcode	
Telephone number Mobile number	
Does subject have a disability? If yes, please give details	Yes No
Families First language	
Any communication barriers that need to be considered? If yes, please give details	

Details about the concern

<p>What is the nature of your concern?</p>	
<p>When did the incident happen? (incl. date & times)</p>	
<p>About the incident/concern (include as much additional information as possible): Any known details of alleged abuser if appropriate; name, address, relationship to subject</p>	
<p>Any immediate action taken? (what action, have you or the Local Delivery Partner taken regarding this concern; e.g. called police, referred to Social Care Services)</p>	

<p>Has there been any other concerns leading to this referral?</p> <p>(Please give as much factual background information as possible)</p>	
<p>Is the subject of concern already known to Social Care?</p> <p>e.g. in care, on a Child Protection Plan</p>	

Local Delivery Partner Details

Name	Organisation	Contact Number	Name of LP designated safeguarding person
<p>What action is the LP taking</p>			
<p>What do you expect to happen next?</p>			

Remember; do not discuss this with friends or colleagues. Speak to your Designated Safeguarding Officer urgently, they will initiate appropriate action and guide you through the process.

Action taken by Bath City FC Foundation member of staff:	Date:
Name of Bath City FC Foundation member completing this form: Contact details:	Date:
Signed by Designated Safeguarding Officer on duty: Contact details:	Date:

Three copies must be retained:

- **Copy 1 – is held by the DSO**
- **Copy 2 – is held by the person responsible for HR, if the concern relates to a member of Bath City FC Foundation staff.**
- **Copy 3 – is given to the Children’s Social Care Services/police, if you receive a disclosure or you have concerns about the welfare of a child.**