Scope:

The purpose of the Foundation's safeguarding policy is to ensure every child at our Foundation is safe and protected from harm. All children regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity have the right to equal protection from all types of harm or abuse and have the right to protection from abuse and exploitation. This policy applies to all trustees, full time staff, casual staff, volunteers and visitors whether they are paid or unpaid.

This policy supersedes any previous COVID-19 safeguarding policies prior to its issue date. It is in addition to other Foundation safeguarding policies and does not replace non-COVID19 safeguarding policies.

Policy Statement:

The Foundation believe that all our environments should be inclusive and welcoming for everyone and people should feel safe, valued and respected in line with our own values. Therefore, we are fully committed to ensuring we deliver a high level of safeguarding practice to ensure this vision is achieved.

From the 5th November 2020, the Foundation has closed all premises in line with Government guidance on COVID-19. All footballing activities have also been suspended in line with FA guidelines.

It is recognised that there may still be times when staff need to engage with children, young people and adults at risk and that safeguarding concerns may continue to be raised.

This addendum of the Safeguarding policy contains details of our individual safeguarding arrangements.

Policy and Procedure:

Reporting a Concern

Where staff have a concern about a child, young person, adult at risk or a member of staff, they should continue to follow the reporting process outlined in the existing Safeguarding Policy which remains unchanged.

Matters can be reported directly by telephone or via the Foundation's external website:

• 'About' \rightarrow 'Safeguarding' \rightarrow 'Raise a Concern' button.

Concerns can also be raised directly at the following email address: <u>safeguarding@norwichcitycsf.org.uk</u>.

Any safeguarding concerns raised will be recorded on the My Concern database by one of designated safeguarding staff and an electronic alert will inform the Head of Safeguarding. This report will be subject to a dynamic risk assessment process and a safeguarding plan will be implemented. Any necessary referrals to statutory and regulatory partners will be made by designated safeguarding staff. These referral methods are currently unchanged however the response may be affected by COVID-19 resourcing issues.

The Head of Safeguarding will continue to be available for any urgent face to face meetings with any child, young person or adult at risk subject to any safeguarding concern in line with Safer Practice rules. Social distancing measures will be undertaken during this process.

Considering the COVID-19 risk enquiries and contact should always be considered by telephone, video conference or by e mail where possible. It will not currently be possible to receive written concerns by letter due to Foundation premises being shut.

All Foundation staff have access to Microsoft Teams which will be the preferred method of internal Foundation safeguarding contact.

Staff are reminded of the need to report any concern as soon as possible and without delay however it will be important to manage expectations of response to maintain confidence during this period. Non urgent cases may face a slight delay however the Foundation are fully committed to providing a prompt and efficient safeguarding service.

Increased risk:

Through the interruption of normal daily business through the COVID-19 situation it is possible that the risk to children, young people or adults at risk may be increased through any of the below areas.

- Risk of access by adults to children (e.g. volunteers) bypassing normal safer recruitment policies and procedures.
- Risk of lack of access to statutory child protection services.
- Risk of child sexual abuse through the virtual learning environment.
- Risk of online peer on peer abuse through the absence of normal face to face contact and heightened use of social media.
- Risks related to youth produced sexual imagery.
- Risk of neglect of children where parents are too ill, anxious, or too burdened with work to be able to care for them.
- Risk of children not having access to usual pastoral and welfare support within the organisation.
- Risk of increased barriers to children reporting concerns to responsible adults.
- Risk of staff members not having access to Designated Safeguarding Leads, or not reporting concerns.
- Risk of distress or anxiety related to health or welfare of family members or friends.
- Risk of anxiety, stress or to mental health posed by isolation, excessive screen time, worries around academic work, exam or qualifications, or simply by exposure to worsening news reports.
- Risk posed by the inability of NHS, private or charitable professionals to provide medical or psychological support for existing or developing health conditions.
- Risk of abuse or stigmatisation based on infection, race or nationality.
- Risk of wider culture slippage posed by the move to the virtual environment.

Protecting Children, Young People or Adults at Risk

Considering the above it is essential that staff and stakeholders are aware of those more vulnerable children, young people or adults at risk within each environment. Vigilance and awareness of any safeguarding plans will be imperative during this period of disruption to mitigate additional risk.

Those children, young people or adults at risk who receive additional support from Local Authorities or Health provision may be receiving a reduced level of care and it is therefore important that staff are alert to any change in behaviour or information which may affect the level of risk.

Designated Safeguarding Officers

All Designated safeguarding staff are available by telephone, email and through Microsoft Teams during normal working hours. There is currently no 24-hour response facility and staff are reminded that any situations involving significant risk or threats to life/serious injury should be reported to Police or Ambulance immediately.

It is possible that some of the below staff will be subject to furlough conditions and therefore may be unavailable to assist any safeguarding queries raised.

Norwich City Community Sports Foundation Safeguarding Team:

Gavin Coe – Senior Safeguarding Manager Lacie Gibson – Designated Safeguarding Lead *(currently on maternity leave)* Claire Pullen – Designated Safeguarding Officer (Nest / NCS) Lauren Jordan - Designated Safeguarding Officer Lewis Plowman - Designated Safeguarding Officer (Football) Curtis Beales – Designated Safeguarding Officer (NCS)

Norwich City Football Club Safeguarding Team:

Gary Dack - Head of Safeguarding Tony Hedges - Designated Safeguarding Officer

'Speak Up' (Formally Whistleblowing):

The Foundation remains committed to conducting its business with honesty and integrity and expects all staff to maintain high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

The Foundation's 'Speak Up' policy remains unaffected by COVID-19 and it hopes that in many cases staff will be able to raise any concerns of poor practice to their line manager. Staff may tell them in person or put the matter in writing if they prefer. They may be able to agree a way of resolving the concern quickly and effectively.

In cases involving concerns raised by stakeholders or customers the Senior Safeguarding Manager should be contacted in the first instance by telephone or e mail, if this is appropriate.

Safeguarding Training

All Foundation staff are currently undertaking remote Premier League safeguarding training and new joiners will do so as part of their induction. The NCFC Head of Safeguarding will communicate any new local arrangements with staff so they know what to do if they are worried about a child, young person or adult at risk.

Safer Recruitment

It remains essential that unsuitable people are not allowed to enter the workforce or gain access to children, young people or adults at risk. When recruiting new staff, the Foundation will continue to follow the relevant safer recruitment processes as per the safer recruitment policy.

In response to COVID-19, the Disclosure and Barring Service (DBS) has made changes to its guidance on standard and enhanced DBS ID checking to minimise the need for face-to-face contact.

The Foundation will continue to follow the legal duty to refer to the DBS, Premier League and FA anyone who has harmed or poses a risk of harm to a child or adult at risk.

Whilst acknowledging the challenge of the current National emergency, it is essential that the Foundation is aware which staff/volunteers will be working directly or remotely with children, young people and adults at risk. All appropriate checks must be carried out, especially for anyone engaging in regulated activity. As such the Foundation's Senior Safeguarding Manager has a responsibility to ensure that the single central record (SCR) is kept up to date.

Communication with children, young people or adults at risk

It is important that all staff who interact with children, young people or adults at risk including online, continue to look out for signs that they may be at risk. Any such concerns should be dealt with in line with the Safeguarding Policy and appropriate referrals will still be made to the relevant statutory and regulatory agency as required.

All staff must ensure any use of online learning tools and systems conforms with privacy and data protection/GDPR requirements.

Below are some things to consider when delivering virtual lessons and keeping in contact with young people especially where webcams are involved:

- Staff should only use equipment provided by the Foundation to contact children and young people. Any difficulties should be discussed with the Foundations Senior Safeguarding Manager.
- Where possible all contact should be carried out in groups. 1-1 contact should be avoided where possible.
- Where direct communication with a player/parent is needed then you should consider having a colleague present to provide protection to all those present.
- All contact with Under 18's should be carried out with parental consent.
- When using online video, staff, children and young people must wear suitable clothing, as should

anyone else in the household.

- Any computers used should be in appropriate areas, for example, not in bedrooms; and the background should be blurred.
- Where permitted by the technology web-based contact should be recorded so that if any issues were to arise, the video can be reviewed.
- Language must be professional and appropriate, including any family members in the background.
- Staff must consider the most appropriate platforms for use.
- Staff should record, the time, date and a brief summary of any contact with a young person (outside of group tutor sessions for FE Programme).

Supporting children, young people or adults currently at risk from harm

All existing live safeguarding concerns have been reviewed and safety plans have been adopted for any person currently at risk of harm These plans have been recorded and will be managed by designated safeguarding staff on the My Concern database. These plans will detail agreed methods and regularity of contact and physical measures or target hardening which may be required.

It is recognised that isolation may increase vulnerability and affect well-being.

Supporting FE Students

Students will continue to be educated in the classroom setting at Norwich City FC, Carrow Road.

Education will continue as per the government guidance and all COVID-19 requirements will be followed.

Tutors will maintain contact with any students that are required to isolate as per NHS and government guidance, as appropriate. Students who are not unwell with COVID-19 and are isolating but are symptomless should continue their education via video conferencing where possible.

Esports

Any staff considering arranging an esports event should consider:

- Generally expected behaviour of officials, coaches and players towards each other.
- The prevention, detection and combating of any form of bullying, physical misuse or gaming addiction to games and the reporting of in line with the Foundations safeguarding procedure.
- Application of relevant age limits.
- Gaining parental consent for under 18's.

Further Guidance and Support

- <u>https://www.gov.uk/government/publications/actions-for-schools-during-the-coronavirus-outbreak/guidance-for-full-opening-schools</u>
- <u>https://www.gov.uk/government/publications/coronavirus-covid-19-early-years-and-childcare-closures/coronavirus-covid-19-early-years-and-childcare-closures</u>
- <u>https://www.gov.uk/government/publications/coronavirus-covid-19-maintaining-further-education-provision/what-fe-colleges-and-providers-will-need-to-do-from-the-start-of-the-2020-autumn-term</u>

- <u>https://www.gov.uk/government/publications/coronavirus-covid-19-providing-home-care</u>
- <u>https://www.gov.uk/government/publications/supported-living-services-during-coronavirus-</u> covid-19
- https://www.gov.uk/government/publications/coronavirus-covid-19-guidance-on-isolationfor-residential-educational-settings
- https://www.gov.uk/government/publications/covid-19-school-closures/guidance-forschools-about-temporarily-closing
- https://www.gov.uk/government/news/coronavirus-covid-19-guidance-for-the-charity-sector
- https://knowhow.ncvo.org.uk/coronavirus/
- https://www.gbgplc.com/same-day-dbs-key-worker-checks/
- https://www.gov.uk/government/news/covid-19-changes-to-dbs-id-checking-guidelines

Foundation Associated Policies

- Safeguarding Children
- Safeguarding Adults at Risk
- Safer Recruitment
- Speak Up

Policy Issue	Date:
Date of Next	Update:

November 2020 January 2020

This policy is next due for a general review on the above date. It may however be reviewed and updated earlier, in the event of a change in Foundations requirements, or relevant legislation.