Aim

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 means we will always work to:

- Protect children from maltreatment.
- Prevent impairment of children's health or development.
- Ensure that children are growing up in circumstances consistent with the provision of safe and effective care.
- Take action to enable all children to have the best outcomes

This policy will give clear direction to staff, volunteers, visitors and parents about the expected behaviour and our legal responsibility to safeguard and promote the welfare of all children at our Foundation.

Introduction

The Foundation fully recognises the contribution it can make to protecting children from harm and supporting and promoting the welfare of all children. The elements of our policy are prevention, protection and support. Our policy applies to all children, volunteers, visitors and staff. A child is someone under the age of 18 years old.

Our Ethos

Our Foundation will establish and maintain an ethos where our children feel secure, are encouraged to talk, are listened to and are safe. Children will be able to talk freely to any member of staff or volunteer at the Foundation if they are worried or concerned about something.

All staff, volunteers and regular visitors will, either through training or induction, know how to recognise a disclosure from a child and will know how to manage this. We will not make promises to any child and we will not keep secrets. Every child will know what the adult will do with whatever they have been told.

We will provide activities and opportunities that will equip our children with the skills they need to stay safe.

At all times we will work in partnership and try to establish effective working relationships with parents, carers and colleagues from other agencies and Foundations.

General Procedures

When new staff, volunteers or regular visitors join our Foundation they will be informed of the safeguarding arrangements in place. They will be given a copy of our Foundation's safeguarding policy and told who our Designated Safeguarding Officers are. They will also be shown the recording format, given information on how to complete it and who to pass it to.

Every new member of staff or volunteer will have an induction period that will include essential safeguarding information. This programme will include safeguarding training through the Foundation's Safer training programme relating to signs and symptoms of abuse, how to manage a disclosure from a child, how to record and issues of confidentiality.

The induction will inform staff and volunteers of their responsibility to safeguard all children and the remit of the role of the Designated Safeguarding Officer.

All staff and volunteers and trustees will be asked to read this policy annually after it has been reviewed and updated if necessary. They will sign to say they have read and understood the policy.

Parents, guardians and carers will be informed of our legal duty to assist our colleagues in other agencies with child protection enquiries and what happens should we have cause to make a referral to Children's Services.

Parents will sign a consent form at the start of their child's involvement with the Foundation, which includes any vital health or otherwise notable information. It also requests permission for photographs to be taken for promotional purposes only.

The Foundation has a Youth board, who are involved in a number of decisions making including agreeing the safeguarding policy of the Foundation. The Foundation will listen to the views and wishes of the young people accessing activities from the Foundation.

Safeguarding Training

Every member of staff and volunteer will undertake appropriate safeguarding, first aid and DBS training every three years and receive annual refresher training through the Foundation's Safer training programme.

We actively encourage all of our staff to keep up to date with the most recent local and national safeguarding advice and guidance. This can be accessed via www.norfolklscb.org

The Designated Safeguarding Officer should be used as a first point of contact for concerns and queries regarding any safeguarding concern and is also responsible for managing the staff risk register.

Foundation's Safer Staff and Volunteers

All adults who come into contact with our children have a duty of care to safeguard and promote their welfare. There is a legal duty placed upon us to ensure that all adults who work with or on behalf of our children are competent, confident and safe to do so.

We ensure we adhere to the principles of safer recruitment as per our policy and also the guidance from Norfolk Safeguarding Children Board.

We ensure that we:

- Carefully consider the job description and person specification
- Circulate all vacancies widely.



- Prepare an information pack
- Ask for an online application form
- Define our selection criteria in the job description
- Ask for a written declaration with regards to criminal convictions, spent or otherwise
- Ask for identification
- Ask for originals of any qualifications
- Conduct interviews with at least two people present
- Ask for at least two written references, including the last employer
- Gain enhanced DBS checks where current Government guidance requires us to
- Organise a comprehensive induction period which includes familiarisation with our safeguarding policies, procedures and safeguarding training through the Foundation's Safer Programme.
- All staff and volunteers at the Foundation are required to complete an enhanced DBS check every 3 years. Any referrals made to DBS will be carried out by the Head of Safeguarding and recorded on My Concern.

Our aim is to provide a safe and supportive environment which secures the well-being and very best outcomes for our children. We do recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made. Allegations sometimes arise from a differing understanding of the same event, but when they occur, they are distressing and difficult for all concerned. We also recognise that many allegations are genuine and there are some adults who deliberately seek to harm or abuse children.

We will take all possible steps to safeguard our children and to ensure that the adults in our Foundation are safe to work with our children. We will always ensure that the Norfolk Safeguarding Children Board's procedures are followed. All adults who come into contact with children will be made aware of the steps that will be taken if an allegation is made.

All staff and volunteers at the Foundation are required to complete an enhanced DBS check every 3 years. Any referrals made to DBS will be carried out by the Designated Safeguarding Officer and documented by the Foundation. The Foundation has a legal duty to make referrals to the DBS should they have any concern that a person has either harmed or poses harm to a child or Adult at risk

Staff will not investigate these matters. We will seek and work with the advice that is provided. Should an allegation be made against the Designated Safeguarding Officer or Deputy, this will be reported by the staff member or volunteer raising the concern directly to the LADO.

All adults who come into contact with children will be made aware of the steps that will be taken if an allegation is made. We will seek appropriate advice from the Local Authority Designated Officer (LADO) within 24 hours of a concern or allegation being made. The LADO can be contacted via the referral/consultation forms under 'how to raise a concern' at www.norfolklscb.org or a message left on 01603 223473 for ongoing cases.



Staff will not investigate these matters. We will seek and work with the advice that is provided. Should an allegation be made against the Designated Safeguarding Officer or Deputy, this will be reported by the staff member or volunteer raising the concern directly to the LADO.

There are sensible steps that every adult should take in their daily professional conduct with children. This can be found in the NSCP Safer Programme Safer Working Practice (this guidance is on the NSCP website and also included in our procedures).

My Concern

The Foundation's safeguarding team alongside the Norwich City Football Club's safeguarding team currently employ the use of MyConcern. MyConcern is used to ensure the safety and protection of the participants engaging in all activities and / or programmes run by either the Foundation or the Club.

Any member of the Strategic Safeguarding Panel ("SSP") or the Safeguarding Operational Groups (from both the Foundation and the Club) has the authority to input cases onto MyConcern with as much information as possible. The SSP has delegated authority, from both Boards, to oversee and monitor the safeguarding arrangements of the organisations and ensure the final closure of any active cases on MyConcern.

The system is used to collate information regarding any safeguarding concerns that arise involving any member of staff, voluntary, casual, part-time or full-time, or participant._It will ensure collaboration between the Foundation and the Club and provide assurances to the Board of Trustees and the Club's Board of Directors that the safeguarding system is robust and withholds scrutiny from relevant external agencies. The system should complement current safeguarding policies and procedures and allow the Club's Head of Safeguarding a complete overview of both the Foundation and the Club's safeguarding practice. It will allow the Foundation and the Club to adhere to the Premier League Compliance Standards.

Whilst every member of staff in both organisations is responsible for safeguarding and may have a participant or member of staff share a disclosure with them, the only people who will have superuser access to MyConcern will be those whose position is specific safeguarding role. Superuser membership of MyConcern should include the following:

- Club's Head of Safeguarding
- Club and Foundation Senior Safeguarding Lead
- CSF Head of Operations and Business Development
- Designated Safeguarding Officers (both Foundation and Club)

This limited superuser membership is to ensure that the privacy of individuals involved is protected and to ensure that cases are not compromised if they have to go to court. In the future, general user membership (with limited access) may be rolled out to all staff.

The Club's Head of Safeguarding is responsible for ensuring that every case on MyConcern is investigated and closed off or escalated as appropriate. If the Head of Safeguarding deems escalation to external agencies is necessary, they should inform all relevant members of this

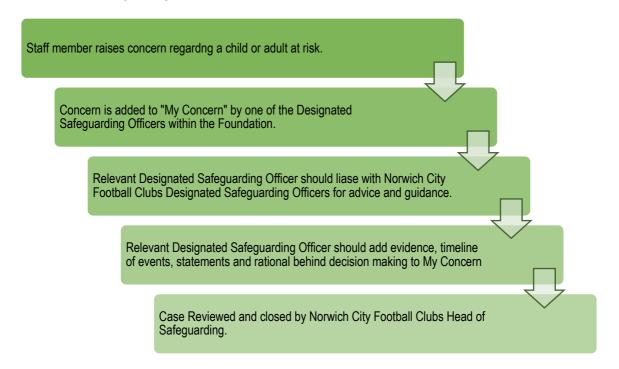


decision. All safeguarding concerns raised will be uploaded to MyConcern by any superuser member but will be escalated to external agencies by the Club's Head of Safeguarding when the Premier League threshold is met. The Club's Head of Safeguarding should take the lead on all cases when the Designated Safeguarding Officers have exhausted the scope of their role and need additional support. The Club's Head of Safeguarding is responsible for closing all cases off the system; however, cases must have been discussed and evidenced by an agenda to allow for transparency and safeguarding of the position. The Designated Safeguarding Officers, for both the Foundation and the Club, as responsible for ensuring that all their cases are correctly input into the system with all relevant detail included to allow the Head of Safeguarding to investigate and action appropriately. The Foundation should be transparent with the Club regarding any safeguarding concerns to ensure that a collaborative relationship is maintained and the commitment to safeguarding is upheld. The Club should be transparent with the Foundation regarding any changes to the MyConcern system and involve the Foundation on all required training to ensure minimal operational standards are maintained. The Club should involve all relevant Foundation safeguarding staff in correspondence, additional training and learning case studies that would develop a collaborative relationship, ensure best practice is maintained and any lessons are learnt.

MyConcern is owned by the Club and the Foundation are users, thus the Club are accountable for creating reports for SSP meetings and any meetings between Foundation and Club. Staff are not required to share their MyConcern access or any information that will affect the rights or privacy of an individual or affect the integrity of any cases. Staff are required to ensure their cases are completed to the best of their knowledge and to follow up with the Club's Head of Safeguarding if their case has not been actioned within 21 days. Foundation Designated Safeguarding Officers should liaise with Club Designated Safeguarding Officers for advice and guidance when necessary to ensure best practice.



Details of the relationship between the Community Sports Foundation and Norwich City Football Club regarding the use of "My Concern".



Roles and Responsibilities

Our Designated Safeguarding Officer will liaise with Children's Services and other agencies where necessary, and make referrals

Referrals against the Designated Safeguarding Officer will be made direct to the Senior Safeguarding Manager. Any referrals against the Senior Safeguarding Manager are to be made direct to the Designated Safeguarding Officer.

The Designated Safeguarding Officer will ensure that our safeguarding policy is in place and is reviewed annually. The content of our policy has been written following consultation with the Safer Programme and the Senior Safeguarding Manager at the Foundation.

At all times the Designated Safeguarding Officer will ensure that safer recruitment practices are followed. Our Foundation undertakes to remedy without delay any weakness in regard to our safeguarding arrangements that are brought to their attention.

Designated Safeguarding Officer Contact Details:

Name	Role	Email	Telephone Number
Tom Smith	Lead Safeguarding Trustee	thomas.smith@canaries.co.uk	N/A
Gavin Coe	Senior Safeguarding Manager	gavin.coe@norwichchitycsf.org.uk	07468 417561
Lacie Pammen	Designated Safeguarding Officer	lacie.pammen@norwichchitycsf.org.uk	07799 141873
Claire Pullen	Designated Safeguarding Officer (NCS / The Nest)	claire.pullen@norwichchitycsf.org.uk	07468 417495
Lewis Plowman	Designated Safeguarding Officer	lewis.plowman@norwichcitycsf.org.uk	01603 761122
Lauren Jordan	Designated Safeguarding Officer	lauren.jordan@norwichcitycsf.org.uk	01603 761122
Curtis Beales	Designated Safeguarding Officer Support (NCS)	curtis.beales@norwichcitycsf.org.uk	01603 761122

Supervising Ratios

It is important to ensure that, in planning and delivering sporting activity for children and young people, consideration is given to providing an appropriate staffing/supervision ratio of adults to participants. This minimises any risk to the participant, provides reassurance to parents and provides protection for those individuals delivering the event

To enhance the safety of supervision individuals should have been subject to robust safer recruitment processes, provided with proper training and awareness of policy, having correct insurance and stringent risk assessments for the activity.

Risk assessments should inform appropriate supervision levels however whatever the ratio of individuals to children best practice will be that two adults should be present.

Key factors to assess include:

- Ages of children
- Additional supervision/support needs of some or all participants (for example due to disability or age)
- Competence/experience of participants for the specific activity



- Nature of activity (for example climbing or swimming sessions may require higher levels of supervision than an aerobics class)
- Nature of the venue whether closed (e.g. a swimming pool) or open (e.g. parkland); private and exclusive to the group or open and accessible to the public); and what types of equipment children may have access to

While the risk assessment may well indicate the need for an enhanced level of supervision and staffing for an activity, the following table shows recommended adult to child ratios. These are based on Ofsted guidelines and would be suitable for working with children, young people and adults at risk.

Remember that regardless of the overall ratio, a minimum of two supervisors is recommended.

Child/Young Persons Age	Number of Adults	Number of Children
0-2	1	3
2-3	1	4
4-8	1	6
9-12	1	8
13-18	1	10

Young People as Supervisors

Many sports provide opportunities for under 18's to coach, officiate or organize events for other children, including achieving qualifications and awards. These positive opportunities allow young people to develop skills, experience and confidence but should not mean that the Club should depend on them to take full responsibility for managing groups of children. Under 18 year olds in coaching or other roles should only supplement the adult with overall responsibility for supervising the activity.

Types of Abuse.

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or another child or children.

Physical Abuse

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional Abuse

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views,



deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Sexual Abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- Protect a child from physical and emotional harm or danger;
- Ensure adequate supervision (including the use of inadequate caregivers); or
- Ensure access to appropriate medical care or treatment.
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Modern Slavery

Modern slavery and human trafficking. Modern Slavery is the term used within the UK and is defined within the Modern Slavery Act 2015. These crimes include holding a person in a position of slavery, servitude forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after.

Modern Day Abuse

Modern day slavery may include but is not limited to radicalisation, female genital mutilation, child sexual exploitation, gender-based violence, sexting and trafficking.



Safeguarding Process

Staff and volunteers may raise a concern about a child or Adult at risk based on changes in their behaviour, marks on their body etc. A child or Adult at risk may also disclose information regarding themselves or abuse they have been or are being subjected to. The Foundation has a process in place to ensure that all staff and volunteers are able to respond effectively.

Things to remember when you have a concern:

- If appropriate speak to the child or adult as risk making notes of the conversation. Remember don't ask any leading questions or make any promises
- Complete the at-risk report form and contact the Designated Safeguarding Officer.
- Doing nothing is not an option

Things to remember when dealing with a disclosure:

- Listen to the child or adult as risk making notes of what they say to you.
- Don't ask any leading questions or make any promises
- Explain that you must pass the information on to the relevant people so they can help
- Reassure them that they did the right thing telling you
- Call the Designated Safeguarding Officer and make them aware of the referral
- Doing nothing is not an option

At Risk Reporting

All concerns regarding a young person or vulnerable adult that may be at risk should be recorded on the "At Risk" report form which every member of staff and volunteer should have on them or can access from the Foundation's office.

All staff and volunteers should complete the form to the best of their knowledge, ensuring the information is legible. (Forms may be required by external agencies.) While this procedure provides a recommended approach, it is important to stress that every situation is different and should be elevated on its own unique situation.

Anybody external can now raise a concern on the website by clicking on the 'raise a concern' button on the safeguarding page. This will allow a report to be sent to the designated email address of safeguarding@norwichcitycsf.org.uk. This inbox is manager by Lacie Pammen and Lauren Jordan (Designated Safeguarding Officers).

Please be aware staff are still required to complete an internal "at risk" report form and place this in the Foundation's safeguarding tin located near the ops team desks.

We are clear that the Local Authority and Police must lead any investigation into any allegation regarding safeguarding.

If we have a concern about a child or children, we will telephone the Children's Advice and Duty Service (CADS) on 0344 800 8021 immediately. We will be put through to a Social Worker who will take all of the relevant details. We will make sure we are prepared with full details of the child and family, plus what our concerns are, details of any support we have provided to the child/family and what we would like to happen. We will ensure we gain consent from the parent/carer unless to do so would place the child at further risk of harm or undermine

a criminal investigation. If we have not sought consent from the parent/carer we will inform the CADS worker of this and the reason for this.

The CADS worker will agree a way forward with us and keep us informed. They will send us a written record of our conversation within 5 working days. The outcomes could include a full referral to the Multi Agency Safeguarding Hub (MASH) for further investigation, the Police, or for work with Early Help. We will not investigate and will be led by the Local Authority and/or the Police.

We will make careful records of all conversations, in ink, including the dates and times of who we spoke to, the information shared, and the action agreed. We do not need to send a written referral.

Full details on this process can be found at www.norfolklscb.org under 'How to Raise a Concern'.

We understand if we are unhappy about a decision made by CADS or MASH, we can use the Resolving Professional Disagreements policy on www.norfolklscb.org and contact the Safer Programme for more advice on this process.

NCS Programme Reporting

The NCS programme has its own reporting procedures in addition to those set by the Foundation. These are detailed within the NCS Trust Crisis and Incident Reporting Guide – 27th September 2019.

Whilst any persons (full time, casual, volunteer) working on the NCS programme must be aware of these reporting procedures it is the responsibility of the Designated Safeguarding Officer (NCS) to follow the NCS guidelines for reporting to the NCS Trust and Reed in partnership as per the timescales set. All staff working on the NCS programme must follow the Foundation's reporting procedures as detailed above. Should any clarification be required please contact the Designated Safeguarding Officer (NCS) for guidance.

Key Contacts

ncy contacts		
Organisation	Email / Website	Telephone
		Number
Local Authority Designated Officers	N/A	01603 223473
(LADO) Team		
Safer Programme	N/A	01603 228966
Norfolk Safeguarding Children Panel	www.norfolklscb.org	N/A
(NSCP)		
Children's Services 24 hours	N/A	0344 800 8020
Children's Advice and Duty Service	N/A	0344 800 8021
(CADS)		0344 600 6021
Norfolk Police	N/A	101
EFL Trust	N/A	01772 325940
FA Case Management Team	N/A	0845 210 8080
In an emergency	N/A	999



Child Exploitation Online Protection Centre	www.ceop.police.uk	N/A
NSPCC Helplines	www.nspcc.org.uk /	0808 800 5000
Childline		0800 1111

External Organisations

At times the Foundation may require external organisations to deliver activities/ programmes on its behalf such as at activity centres. The Foundation ensures that those organisations have the same principles as its own with regards to safeguarding children. The Foundation always ensure that one of its representatives is present whilst the external organisation delivers to monitor this, the representative would also be responsible for raising any concerns or issues to the Designated Safeguarding Officer.

All providers of activity under the Foundation must adhere to the Foundation's safeguarding policy. This policy is provided for Foundations of commissioned work or other providers in order to fall in line with the Foundation. Compliance to this policy is carried out by the Designated Safeguarding Officer.

How to Make A Complaint About A Safeguarding Concern

Please provide us with as much detail as you can to help us investigate your complaint:

- Say what the problem is say
- What you want to happen
- Provide information on any relevant communication with us on the subject, including, for example, any reference numbers on letters or emails, and the times and dates of any conversations

How To Raise An Appeal Against The Outcome Of A Safeguarding Complaint - Stage 1

- The Foundation will acknowledge the appeal within 3 working day of receipt.
- The Foundation will appoint a senior manager within The Foundation, who has not been directly involved in the assessment or decision-making process for the appellant/ Foundation, and who is familiar with the relevant Foundation requirements and processes, to investigate the appeal.
- The investigation will be completed, and the appellant informed in writing of the decision within 12 working days of acknowledgement of receipt.
- If the appeal is upheld, The Foundation will take appropriate corrective action to change the decision and address any issues.

How To Raise An Appeal Against The Outcome Of A Safeguarding Complaint - Stage 2

- The appellant or The Foundation may request that an Appeal Review Panel (ARP) is appointed to further consider the appeal. The request must be received in writing within 3 months of the notification of the outcome of the stage 1 process, after which the appeal will be closed.
- The Foundation will consist of a Chairman and two members nominated by the Chairman of The Foundation. The Foundation members shall have no commercial interest in the appeal being considered and shall not have been personally involved in any matters relating to the appeal.



- If the Foundation determines it necessary, a hearing will be held at which both the appellant and The Foundation will present their case. Experts and witnesses may also be called to attend the hearing. Any supporting documentation from the appellant must be submitted to the Chairman of the Foundation at least 5 working days ahead of the hearing.
- The Foundation will consider the evidence and make a recommendation to the Chief Executive Officer of The Foundation, within 1 month of the constitution of the Foundation.
- The Chief Executive Officer of The Foundation will make the final decision and inform the appellant in writing of the outcome of the appeal, within 3 working/business days of receipt of the recommendation from the Foundation and appropriate action will be taken. A copy of the Conclusions and Recommendations of the Appeal Review Panel will be provided to the appellant.
- The appellant may withdraw the appeal at any time during the process. If for any reason an appeal is withdrawn, The Foundation will not accept a future appeal on the same grounds.

Relevant Guidance and Legislation

- Working Together 2018
- What to do if You're Worried a Child is Being Abused 2015
- Children Act 2004
- Children Act 1989
- Care Act 2014
- Framework for the Assessment of Children in Need and their Families
- The FA, Premier League, EFL and EFL Trust safeguarding policy

Other Relevant Policies

To underpin the values and ethos of our Foundation and our intent to ensure our children/young people are appropriately safeguarded the following policies are also included under our safeguarding umbrella:

Safer Recruitment, Bullying, Safer Working Practice, Code of Conduct, Confidentiality, Health and Safety, Whistle Blowing, Complaints, First aid.

Policy Review

Policy Issue Date April 2021
Date of Next Update April 2022

All safeguarding policies and procedures are due for a general review on the above date. They may however be reviewed and updated earlier, in the event of a change in Foundation requirements, or relevant legislation.

This policy has been endorsed by the Chief Executive Officer and Board of Trustees.