



**Tranmere Rovers
Safeguarding Policy
September 2019**

Introduction

Tranmere Rovers Football Club seeks to create a supportive and vigilant environment to thereby ensure the safety and well-being of all children, young people and vulnerable adults who engage in activities with the Club. For the purposes of this policy, a child or young person is someone under the age of 18 years. The purpose of this statement is to explain briefly and clearly the basic principles of safeguarding children. To support this, the following policy and procedure document has been produced and recognises all recent and relevant legislation and regulations at the date of publication.

This policy and procedure has been approved by the Local Children Safeguarding Board and promotes the statutory guidance for safeguarding and promoting the welfare of children as set out in Working Together to Safeguard Children 2015, the Sexual Offences Act 2003, and remains in place until such time as it is replaced or revoked by the football club. Please note that this document is designed to complement and provide a context for the full LSCB Safeguarding procedures and does not replace them. For more information please see: <http://wirrallscb.proceduresonline.com/index.htm>

This Policy is for use throughout the Club and is to be observed by all those working with children and young people whether employed by the football club or not. The application of this policy and procedures is not discretionary. All the requirements are obligatory and are to be enforced as indicated by the appropriate persons in all cases where there are any suspected instances of abuse or poor practice.

It is through the application of the policy and procedure that the football club will seek to develop a positive and proactive welfare programme to enable all children and young people to participate in an enjoyable and safe environment. This equally applies to the safety and security of those working with and responsible for the activities involving children and young people. The policy will be reviewed annually.

All employees and volunteers must make themselves aware of the Club's Safeguarding Children's Policy and where appropriate their work with children and young people will be supported by a safeguarding training programme. Players and other young people at the Club are informed about safeguarding, where to access support and information and scholars also have talks on Safeguarding as part of their induction.

The designated person with responsibility for Safeguarding at the Club (Designated Safeguarding Lead [DSL]) is Paul Morrison 07495626014, PaulM@tranmererovers.co.uk
The Club believes that it is always unacceptable for a child or young person to experience abuse of any kind and accepts its responsibility to safeguard the welfare of children and young people, who engage in any way in any activity carried out with the Club. Their welfare is of paramount importance. It is the duty of all adults working at the Club to safeguard the welfare of children and young people by creating an environment that protects them from harm. Activities are taken to include any activity whether football related or not with the Club's authority and permission.

Activities included under the remit of this policy include but are not restricted to:

Tranmere Rovers Youth, Tranmere Rovers Developmental Groups, Tranmere Rovers FUTSAL groups, Tranmere Rovers in the Community, Tranmere Ladies, Tranmere Soccer Schools, Tranmere College, and any activities and courses within the Recreation Centre.

Rules & Regulations

The Club has in place comprehensive safeguarding procedures which meet the requirements of the FA Safeguarding Children Rules and The Children Act 1989 and 2004 to ensure the national standards for safeguarding are met and implemented throughout the Club. The Club also has a responsibility to maintain regular dialogue with the Local Safeguarding Children Board.

Aims & Key Principles

The aims of the Club's Safeguarding Children Policy are as follows:

- To safeguard all children and young people who interact with the Club.
- To demonstrate best practice in the area of safeguarding children.
- To develop a positive and proactive welfare programme to enable all children and young people to participate in an enjoyable and safe environment.
- To promote high ethical standards throughout.

The key principles underpinning this policy are:

- The child's or young person's welfare is, and must always be the paramount consideration.
- All children and young people have a right to be protected from abuse regardless of their age, gender, disability, culture, racial origin, religious beliefs or sexual identity.
- All allegations of abuse will be taken seriously and responded to efficiently and appropriately.
- All staff, coaches, parents and other adults who come in contact with children and young people provide good role models of behaviour.

We will seek to safeguard children by:

- Listening to them, respecting them and valuing them
- Adopting the best practice in the management of safeguarding
- Ensuring all staff are recruited appropriately for working with children
- Liaising effectively both within the Club and with external Safeguarding agencies
- Providing appropriate, up to date and on-going training for all staff
- Appoint a member of staff with specific remit for Safeguarding

Designating Safeguarding Lead

The Club has a Designated Safeguarding Lead (DSL) Paul Morrison 07495626014, PaulM@tranmererovers.co.uk, who has responsibility for safeguarding at the Club. The DSL will promote awareness of safeguarding best practice and develop appropriate links and relationships across the whole of the Club. The DSL will ensure that the Safeguarding Policy and Procedures are updated and in line with current legislation and regulations, and will liaise with Football Association, the Local Safeguarding Children Board and other appropriate agencies in matters of safeguarding and child protection. Any person/s with concerns about a child or young person's welfare should contact this officer.

Recruitment & Disclosure

All staff and volunteers applying to take up positions at the football club will be required to fill in an application form. They will be required to provide, at least two appropriate referees who can vouch for their character and suitability to be in a position of responsibility for children. References will always be sought from applicant's most recent employer/ school /college as applicable. As part of the Club's recruitment and selection process, offers of work to positions which involve working with children are all subject to a satisfactory Enhanced Disclosure and Barring Service disclosure. All requests for Disclosure and Barring Service clearances are routed via the Football League who are an umbrella body registered with the Criminal Records Bureau. All offers of work are subject to the outcome of the screening process and until such time as a satisfactory Disclosure and Barring Service certificate has been received, the member of staff will not be left unsupervised with children. All employees, workers or volunteers in a position of trust will be required to undergo regular Disclosure and Barring Service disclosure clearances, normally every 3 years (or earlier if requested by the DSL), as a condition of their employment. Should an individual's Disclosure and Barring Service Disclosure reveal any convictions the Club must consider whether the nature of the offence /offences renders the person concerned unsuitable for working with children. In such circumstances, when the nature of any disclosure has to be considered, a risk assessment will be carried out by the DSL with the Chief Executive to assess the information contained within the disclosure certificate. The member of staff may also be asked to attend an interview prior to a recruitment decision being made.

All new employees, workers or volunteers working with children or young people at the Club will be required to complete a Self Declaration on commencement of duties. The Club will also ensure that all temporary staff and external consultants sign a self declaration form and will not have unsupervised access to children during their time with the Club.

Coach/employee Training

All coaches working in direct contact with children shall be required to complete The FA workshop on Safeguarding Children in Football and will receive regular training appropriate to their position. This is a condition of employment. Details of those satisfactorily completing this course are retained by the DSL.

Responsibility of Safeguarding Children - Position of Trust and Duty of Care

The Club acknowledges its responsibility to safeguard the welfare of every child and young person who has been entrusted to its care and is committed to working to provide a safe environment. All members of Staff are accountable for the way in which they exercise authority, manage risk, use resources and protect children from discrimination and avoidable harm. To ensure best practice at all times staff must be fully aware of this Safeguarding Policy and the responsibilities which form part of their employment with the Club. All Club employees and workers (including volunteers), whether paid or voluntary, have a duty of care to keep children safe this can be exercised through the development of respectful, caring and professional relationships between staff and children. Behaviour by Club workers or employees that demonstrates integrity, maturity and good judgement is essential. Any person responsible for a child or young person, whether solely or jointly, is in a position of trust which requires behaviour to be in accordance with this policy.

Signs, Indicators and Forms of Abuse and Poor Practice

"Child Abuse" is a term used to describe what happens when a person, or a group of people, harm a child or young person under the age of 18. Abuse and neglect are forms 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 a stranger. They may be abused by an adult or adults, or another child or children. There are five types of abuse to be aware of that can arise in a football situation; they are as follows;

- **Neglect,**
- **Physical Abuse,**
- **Sexual Abuse,**
- **Emotional Abuse,**
- **Bullying.** (Please note: with regard to bullying, the Club has an additional anti-bullying policy, dealing specifically with the prevention of bullying).

For details of the signs of abuse, please refer to the Appendix attached to this policy.

Raising a Safeguarding concern

What to do if you Suspect Abuse or Poor Practice has occurred?

If you are concerned about the welfare of a child or young person or you are concerned about an adult's behaviour towards a child or young person you must act. Do not assume that someone else will help the child. Safeguarding children is everyone's responsibility. It is important that you report your concerns to the DSL, Paul Morrison 07495626014, PaulM@tranmererovers.co.uk.

Taking no action is not an option. Swift and immediate action is required of all members of the staff team where there is a concern for a player's well-being. All members of staff have a duty and responsibility for all players in the Academy in respect of safeguarding concerns. Safeguarding concerns cannot be passed from one member of staff to another but must be brought to the attention of the DSL.

A clear process for the reporting of concerns about abuse or neglect is outlined below:

- If any member of staff has a concern (neglect, emotional, physical, bullying or sexual abuse), this should be reported **IMMEDIATELY** to Paul Morrison or one of the other senior full-time staff.
- The member of staff concerned should also complete the incident sheet (see appendix) and pass it on to Paul Morrison.
- Paul Morrison, or the Senior Member of staff acting in his absence, will then determine in light of the specific player, who will then see the player where appropriate and gather accurate information. A body map may be completed if there is evidence of physical injury. Following this investigation, the DSL will decide what further action needs taking. A Player Log will be created outlining the times, dates and course of any action undertaken.
- If the DSL determines that the concern needs to be passed on, he will **immediately** contact the children's services Central Advice and Duty Team (0151 606 2008) for advice and appropriate action. Incidents should also be passed directly to the police if the child/ young person has received or is at risk of significant harm.
- Where appropriate the Safeguarding Lead will liaise with the player's parents/carers.

Recommended advice on how to gather information from a player who is a cause for concern:

Immediate danger – firstly and before any other action, try to ensure that the player is safe. Stay calm and reassure the player. Obtain **FACTUAL** information about the player and the circumstances, by using sensitive and tactful means. Communicate with a player in a way that is appropriate to their age, understanding and preference. Do not frighten or question a player excessively (be aware of the child's reactions at all times). **Do not** put words into their mouths or ask questions that could be interpreted as doing so. **Do not** ask leading questions. You must merely try to establish the facts in order to report the incident. All matters will be fully investigated and appropriate action will be taken. Action may include referral to the Police or Children Services and to the Football League as appropriate and if seen to be required by the Safeguarding Officer. Remember the child's welfare is of paramount importance. Data should be stored in line with the regulations laid out in the Data protection act (1998).

Taking action

Any child, in any family could become a victim of abuse. Staff should always maintain an attitude of "it could happen here". It should also be noted that additional vigilance needs to be displayed towards children and young adults with special needs who can suffer additional significant challenges (SEN Code of Practice 2015).

Key points for staff to remember for taking action are:

- in an emergency take the action necessary to help the child, if necessary call 999
- report your concern as soon as possible to the DSL, or deputy in their absence, definitely by the end of the day
- do not start your own investigation
- share information on a need-to-know basis only - do not discuss the issue with colleagues, friends or family
- complete a record of concern
- seek support for yourself if you are distressed.

If you are concerned about a player's welfare

There will be occasions when staff may suspect that a player may be at risk. The player's behaviour may have changed, or physical signs may have been noticed. In these circumstances, staff will try to give the pupil the opportunity to talk and ask if they are OK or if they can help in any way. Staff should use the incident referral form to record these early concerns. If the pupil does reveal that they are being harmed, staff should follow the advice below. Following an initial conversation with the pupil, if the member of staff has concerns, they should discuss their concerns with the DSL.

If a player discloses to you

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault. Sometimes they may not be aware that what is happening is abusive.

If a player talks to a member of staff about any risks to their safety or wellbeing, the staff member will, at the appropriate time, let the player know that in order to help them they must pass the information on to the DSL. The point at which they tell the player this is a matter for professional judgement. During their conversations with the player staff will:

- allow them to speak freely
- remain calm and not overreact
- give reassuring nods or words of comfort - 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me'
- not be afraid of silences
- **under no circumstances** ask investigative questions - such as how many times this has happened, whether it happens to siblings, or what does the player's mother think about it
- at an appropriate time tell the player that in order to help them, the member of staff must pass the information on and explain to whom and why
- not automatically offer any physical touch as comfort
- avoid admonishing the player for not disclosing earlier. Saying things such as 'I do wish you had told me about this when it started' may be interpreted by the player to mean that they have done something wrong
- tell the player what will happen next
- report verbally to the DSL even if the child has promised to do it by themselves
- complete the **referral form** and hand it to the DSL as soon as possible
- seek support if they feel distressed.

Notifying parents

The Club will normally seek to discuss any concerns about a player with their parents. This must be handled sensitively and the DSL will make contact with the parent in the event of a concern, suspicion or disclosure.

Our focus is the safety and wellbeing of the player. Therefore, if the Club believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are contacted.

Confidentiality and sharing information

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the player and staff involved but also to ensure that information being released into the public domain does not compromise evidence.

Staff should only discuss concerns with the DSL, or deputy in their absence. That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

However, following a number of cases where senior leaders had failed to act upon concerns raised by staff, *Keeping Children Safe in Education (2019)* emphasises that **any** member of staff can contact children's social care if they are concerned about a child.

Child protection information will be stored and handled in line with the Data Protection Act. Information sharing is guided by the following principles. The information is:

- necessary and proportionate
- relevant
- adequate
- accurate
- timely
- secure.

Information sharing decisions will be recorded, whether or not the decision is taken to share.

Record of concern forms and other written information will be stored in a locked facility and] any electronic information will be password protected and only made available to relevant individuals.

The DSL will normally obtain consent from the player and/or parents to share sensitive information with outside agencies. Where there is good reason to do so, the DSL may share information *without* consent, and will record the reason for not obtaining consent.

Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the DSL.

The Data Protection Act does not prevent Club staff from sharing information with relevant agencies, where that information may help to protect a child.

Referral to children's social care

The DSL will make a referral to children's social care if it is believed that a player is suffering or is at risk of suffering significant harm. The player (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

Any member of staff may make a direct referral to children's social care if they genuinely believe independent action is necessary to protect a child

Reporting directly to child protection agencies

Staff should follow the reporting procedures outlined in this policy; however, they may also share information directly with children's social care, police or the NSPCC.

The Designated Safeguarding Lead (DSL): Paul Morrison

- has the status and authority within the Club to carry out the duties of the post, including committing resources and supporting and directing another staff
- is appropriately trained, with regular updates
- acts as a source of support and expertise to the school community
- has a working knowledge of LSCB procedures?
- makes staff aware of LSCB training courses and the latest policies on safeguarding
- keeps detailed written records of all concerns, ensuring that such records are stored securely
- refers cases of suspected abuse to children's social care or police as appropriate
- attends and/or contributes to child protection conferences
- coordinates the Club's contribution to child protection plans
- develops effective links with relevant statutory and voluntary agencies including the LSCB
- ensures that the child protection policy and procedures are reviewed and updated
- makes the Safeguarding policy available publicly, on the Club's website or by other means.

The Designated Area Safeguarding Leads:

Within each relevant area of the Club are trained staff who have responsibility for ensuring safeguarding principles are maintained. They act as an immediate focus point and support person for players within their area and report directly to the DSL on all issues that arise, as they arise. Details of staff responsible throughout the Club is available in the appendix.

In the absence of the DSL, there is a safeguarding committee who will carry out those functions necessary to ensure the ongoing safety and protection of pupils. In the event of the long-term absence of the DSL, Louise Edwards will assume all of the functions above.

Use of Photography & Film Images

The Club takes its guidance on the use of images from guidelines issued by The FA. All images are taken by Club officials who have been briefed by a Club Safeguarding Officer before taking images of children, parental consent is sought in writing at the start of the season or prior to the event. Parents/Carers/Guardians are responsible for informing the Club of any change of circumstances within the Season which may affect consent.

Parents/Carers/Guardians will be informed of how the image will be used. The Club will not allow an image to be used for something other than that for which it was initially agreed. All children featured in Club publications will be appropriately dressed and where possible, the image will focus on the activity taking place and not a specific child. Designated Club photographers will, where applicable, undertake a Disclosure and Barring Service check and attend an FA Safeguarding Children in Football workshop and in any case will be personally responsible for keeping up to date with the latest guidelines on the Use of Images policies

from the Football League. Club Identification will be worn at all times. It must also be noted that children who are the subject of a court order will not have their images published in any Club document. No images of children featured in Club publications will be accompanied by personal details such as their home address. For further information, please refer to photographic images policy.

Any instances of inappropriate images in football should be reported to the Safeguarding Officer.

Social Networking Guidance. The Club recognises that social media and social networking services provide opportunities to effectively engage with a wide range of audiences in a positive manner. However, the Club is also aware of the potential safeguarding risks especially to children and young people when using these forms of media. Social Networking is dealt with in full in a separate policy (Social Networking).

For further information, please refer to cyber bullying/social media policy.

Code of Conduct/ Safe Working Practice for staff

Good Practice: All coaches should adhere to the following principles and courses of action:

- Always work in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication with no secrets).
- Make the experience of the sporting activity fun and enjoyable: promote fairness, confront and deal with bullying.
- Treat all children equally and with respect and dignity.
- Always put the welfare of the child first.
- Maintain a safe and appropriate distance with players and avoid unnecessary physical contact with children.
- Where any form of manual/physical support is required it should be provided openly and with the consent of the child. Physical contact can be appropriate so long as it is neither intrusive nor disturbing and the child's consent has been given.
- If groups have to be supervised in changing rooms always ensure coaches work in pairs
- Ensure that at away events adults should not enter a dressing room
- Be a good role model; never smoke or swear in front of players.
- Always give enthusiastic and constructive feedback rather than negative criticism.

Poor Practice

The following are regarded as poor practice and should be avoided by all personnel:

- Unnecessarily spending excessive amounts of time alone with children away from others.
- Being alone in changing rooms, toilet facilities or showers used by children and young people.
- Taking children alone in a car on journeys, however short.
- Taking children to your home where they will be alone with you.
- Engaging in rough, physical or sexually provocative games, including horseplay.
- Allow or engage in inappropriate touching of any form.
- Allowing children to use inappropriate language unchallenged.

- Making sexually suggestive comments to a child, even in fun.
- Reducing a child to tears as a form of control.
- Allow allegations made by a child to go unchallenged, unrecorded or not acted upon.
- Do things of a personal nature that the child can do for themselves.

Confidentiality

Employees or workers may have access to confidential information about children in order to undertake their responsibilities. In some circumstances, coaches may be given highly sensitive or private information. They should never use confidential or personal information about a child or his/her family for their own or others' advantage. Information must never be used to intimidate, humiliate or embarrass children. Confidential information about a child should never be used casually in conversation, or shared with any person other than on a need-to-know basis. In circumstances where the child's identity does not need to be disclosed, the information should be used anonymously. There are some circumstances in which an employee or worker may be expected to share information about a child, for example when abuse is alleged or suspected. In such cases, individuals have a duty to pass information on without delay, but only to those with designated safeguarding responsibilities.

Dealing with concerns about a colleague

The vast majority of people who work with children are well motivated and would never harm a child. Unfortunately, there are instances when children are harmed and it is essential that the Club creates a culture that makes staff/volunteers willing and comfortable to voice their concerns, particularly those about someone with whom they work or whom they know. Again, the Club's safeguarding procedures should be followed. During an investigation, support should be given both to the individual who voices concerns and to the suspect abuser. Once the investigation is completed, the Club must decide what action, if any, is necessary to prevent a similar situation arising again. All allegations against staff should be reported to the Local Authority Designated Officer for Allegations (LADO). The LADO acts for the LSCB to monitor allegations and ensure that actions in response to the allegation are in line with Wirral's LSCB Procedures.

For further information, please refer to whistleblowing policy.

Suzanne Cottrell

Local Authority Designated Officer (*Allegations*)

Wirral Safeguarding Children Board

□ Hamilton Building, Conway Street, Birkenhead, Wirral CH41 4FD

□ 0151 666 4582

□ 0778 050 8918

□ suzannecottrell@wirral.gov.uk

□ suzanne.cottrell@wirral.gcsx.gov.uk

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The procedure and referral form pertaining to concerns you may have in relation to a professional who works with Children and Young People can be accessed via the following link:

<https://www.wirralsafeguarding.co.uk/professionals/lado-allegations/>

Raising a Safeguarding concern: Contact Details:

Paul Morrison DSL 07495626014
Central Advice and Duty Team 0151 606 2006 for Adults 0151 606 2008 for Children
Emergency Duty Team For emergencies outside of normal office hours 0151 666
4442

**Merseyside Police for general enquiries call 101. From outside Merseyside 0151 709
6010.**

**NSPCC Child line 08001111 NSPC Specific Helpline for Safeguarding in Football 0800
023 2642**

Debbie Lyons-Treadell Safeguarding Officer EFL: 01772 325811

Appendix: Safeguarding Management Structure

The Managing Director is the Board member of staff who takes responsibility for the Club's safeguarding arrangements and they actively champion safeguarding. As a member of the SMT, the managing Director is able to make the Board aware of safeguarding developments at scheduled meetings. This enables the Board to contribute to raising safeguarding awareness and communicating policies and procedures.

The Designated Safeguarding Lead (DSL) has responsibility for the day-to-day management of safeguarding issues and leads a safeguarding team in this respect. The DSL provides a monthly report to the Managing Director.

There is an Executive Safeguarding Team which meets weekly to discuss and monitor safeguarding practice and issues. There are also designated Area Safeguarding Officers for determined areas of the Club who oversee safeguarding within their respective area and report to the DSL as and when required. The Club has produced an organizational safeguarding strategy in order to ensure a culture of vigilance in respect of its safeguarding.

(See Structural Diagram)

Safeguarding

Due to the expansion of the Club and the increasing number of staff who work regularly with Under 18s (students, volunteers, youth players) there have been developments within the infrastructure to meet these demanding changes.

The approach was to develop a wider spread of Safeguarding support throughout the Club. As a result, a new Safeguarding structure was evolved as indicated below:

Chief Executive: Safeguarding SMT Member: Dawn Tolcher							
Designated Safeguarding Lead: Paul Morrison							
Executive Safeguarding Team: Dawn Tolcher: Paul Morrison: Emma Palios: Daniel Shapcott							
DBS Verifiers: Paul Morrison: Louise Edwards							
Area Safeguarding Officers							
FUTSAL	Community	Elite	Post 16 Education)	Pre 16 Education	Stewards	Matchday	International
Paul Morrison	Steve Williams Louise Edwards	Andy Parkinson	Daniel Shapcott Michael Kinsella	James Taggart	Keith Bailey	Christine Roberts	Emma Palios
Shop	Maintenance	Rec Operations	Campus	Finance	Catering and Hospitality	Marketing	Commercial
Steven Rice	Stuart McCann	Chris Garland	Aaron Argomandkhah	Julie McDonnell	Robert Leatherbarrow	Jonathon Swift	Gina Unsworth

Name DOB

Location of disclosure/incident/concern

Date Time

Description/Report [include Who? What? Where? When?]

Person compiling report:

Name of person incident initially reported to:

Subsequent Action (with dates and times):

Tranmere Rovers Anti-Bullying Policy

Statement of Intent

Tranmere Rovers Football Club is committed to providing a caring, friendly and safe environment for all our players so that they can participate in football in a relaxed and secure atmosphere. Bullying of any kind is unacceptable at our club. If bullying does occur, all club staff or parents should be able to tell and know that incidents will be dealt with promptly and effectively. The expectation at Tranmere Rovers is that anyone who knows that bullying is happening is expected to inform the Designated Safeguarding Lead, Paul Morrison 07495626014, PaulM@tranmererovers.co.uk, or any member of staff.

Objectives of this Policy

- All club members, coaches, officials and parents should have an understanding of what bullying is
- All club members, officials and coaching staff should know what the club policy is on bullying, and follow it when bullying is reported
- All players and parents should know what the club policy is on bullying, and what they should do if bullying arises
- As a club we take bullying seriously. Players and parents should be assured that they would be supported when bullying is reported
- Bullying will not be tolerated

What is Bullying?

Bullying is the use of aggression with the intention of hurting another person. Bullying results in pain and distress to the victim.

Bullying can be:

- Emotional -being unfriendly, excluding (emotionally and physically), sending hurtful text messages and tormenting, (e.g. hiding football boots/shin guards, threatening gestures)
- Physical - pushing, kicking, hitting, punching or any use of violence
- Racist - racial taunts, graffiti, gestures
- Sexual - unwanted physical contact or sexually abusive comments
- Homophobic - because of, or focussing on the issue of sexuality
- Verbal name -calling, sarcasm, spreading rumours, teasing

Why is it Important to Respond to Bullying?

Bullying hurts. No one deserves to be a victim of bullying. Everybody has the right to be treated with respect. Individuals who are bullying need to learn different ways of behaving. This club has a responsibility to respond promptly and effectively to issues of bullying.

Signs and Indicators

A child may indicate by signs or behaviour that he or she is being bullied. Adults should be aware of these possible signs and that they should investigate if a child:

- says he or she is being bullied

- is unwilling to go to club sessions
- becomes withdrawn anxious, or lacking in confidence
- feels ill before training sessions
- comes home with clothes torn or training equipment damaged
- has possessions go "missing"
- asks for money or starts stealing money (to pay the bully)
- has unexplained cuts or bruises
- is frightened to say what's wrong
- gives improbable excuses for any of the above

In more extreme cases

- starts stammering
- cries themselves to sleep at night or has nightmares
- becomes aggressive, disruptive or unreasonable
- is bullying other children or siblings
- stops eating
- attempts or threatens suicide or runs away

These signs and behaviours may indicate other problems, but bullying should be considered a possibility and should be investigated.

Procedures

1. Report bullying incidents to the Designated Safeguarding Lead, Paul Morrison 07495626014, PaulM@tranmererovers.co.uk or to any member of the coaching staff.
2. In cases of serious bullying, the incidents will be referred to the County FA Welfare Officer for advice in accordance with FA policy and possibly to The FA Case Management Team.
3. Parents will be informed and will be asked to come in to a meeting to discuss the issue.
4. The bullying behaviour or threats of bullying must be investigated and the bullying stopped quickly
5. An attempt will be made to help the bully (bullies) change their behaviour.
6. If mediation fails and the bullying is seen to continue the club will initiate disciplinary action under the club constitution.
7. In cases of serious bullying, if necessary and appropriate, the police will be consulted.

Action at Tranmere Rovers Football Club

If the club decides it is appropriate for them to deal with the situation they will follow the procedure outlined below:

1. Gathering of information. When a complaint/concern expressed, the member of staff dealing with the matter will make a record of the complaints/concerns and discuss the issue with the DSL.
2. A plan of action will be determined based on the information received from both parties. This may involve the following:

- Reconciliation by getting the parties together.
- It may be that a genuine apology solves the problem or that an unintentional action has been perceived wrongly.
- If this fails or is not appropriate a small panel should meet with the parent and child alleging bullying to get details of the allegation. A record should be taken for clarity, which should be agreed by all as a true account.
- The same panel should meet with the alleged bully and parent/s and put the incident raised to them to answer and give their view of the allegation. A record should again be taken and agreed.
- If bullying has in their view taken place the individual should be warned and put on notice of further action, i.e. temporary or permanent suspension if the bullying continues. Consideration should be given as to whether a reconciliation meeting between parties is appropriate at this time.
- In some cases, the parent of the bully or bullied player can be asked to attend training sessions, if they are able to do so, and if appropriate. The Club will monitor the situation for a given period to ensure the bullying is not being repeated.
- All coaches involved with both individuals should be made aware of the concerns and outcome of the process i.e. the warning.

In the case of adults reported to be bullying anyone within the Club under 18:

1. The County FA Welfare Officer should always be informed and will advise on action to be taken where appropriate.
2. It is anticipated that in most cases where the allegation is made regarding a team manager, official or coach, The FA's Safeguarding Children Education Programme may be recommended.
3. More serious cases may be referred to the Police and/or Children's Services.

Prevention

1. The club will have a policy, which includes what is acceptable and proper behaviour for all members, of which the anti-bullying policy is one part.
2. Parents will have access to a copy of the Anti-Bullying policy, which will also be available on the Club website.
3. The Club will raise awareness about bullying and reacquaint parents and players about the issue of bullying and why it matters, and if serious issues of bullying arise in the club, will consider holding a meeting to discuss the issue openly and constructively.

This policy is based on guidance provided by the Football Association and Kidscape.

KIDSCAPE is a voluntary organisation committed to help prevent child bullying. KIDSCAPE can be contacted on 0207 730 3300 or you can access their website via www.kidscape.org.uk.

You may also wish to access any of the following websites designed to give advice and guidance to parents and children who are faced with dealing with bullying:

www.anti-bullyingalliance.org.uk

www.stoptextbully.com

www.bullying.co.uk

Appendix

Signs of Physical Abuse

Physical abuse may result in the symptoms described below. Aside from direct physical contact, physical abuse can also be caused when a parent or caregiver feigns the symptoms of, or deliberately causes ill health to a child whom they are looking after. Signs of physical abuse include:

- Bruises on legs before a child is mobile
- Black eyes without bruising to the forehead
- Fingertip bruising and bruises in various stages of healing
- Cigarette type burns anywhere, patterned burns (irons), rope burns. Contact burns in abnormal sites.
- Lacerations to the body or mouth
- Multiple fractures. Evidence of old fractures. Any fractures to children under two years old
- Fading injuries noticeable after an absence from school
- Seems frightened of parents, does not want to return home at the end of the day
- Shrinks markedly (backs away) at the approach of adults
- Suffers from frozen watchfulness
- Constantly asks in words/actions what will happen next

Signs of Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may also include non-contact activities, such as involving the children in looking at, or in the production of, pornographic material or watching sexual activities or encouraging children to behave in sexually inappropriate ways. Signs of sexual abuse displayed by children include:

- Difficulty walking or sitting
- Pain/itching/bleeding/bruising/discharge to the genital area/anus
- Urinary infections/sexually transmitted diseases
- Persistent sore throats
- Eating disorders
- Self-mutilation
- Refuses to change for gym or participate in physical activities

- Exhibits an inappropriate sexual knowledge for their age
- Exhibits sexualized behaviour in their play or with other children
- Lack of peer relationships, sleep disturbances, acute anxiety/fear
- School refusal, running away from home
- Demonstrates bizarre, sophisticated, or unusual sexual knowledge or behaviour
- Becomes pregnant or contracts a venereal disease, particularly if under age 14
- Runs away
- Reports sexual abuse by a parent or another adult caregiver
- Attaches very quickly to strangers or new adults in their environment

Signs of Emotional Abuse

Emotional abuse is the persistent emotional ill-treatment of a child such as to cause severe and persistent adverse effects on the child's development. It may involve conveying to children that they are worthless or unloved, inadequate or valued insofar as they meet the needs of another person. It may feature inappropriate expectations being imposed on children, relative to their actual development or age. Signs of emotional abuse displayed by children include:

- Excessive behaviour, such as extreme aggression, passivity or become overly demanding
- Children who self-harm, for instance by scratching or cutting themselves
- Is either inappropriately adult or infantile
- Children who persistently run away from home
- Children who show high levels of anxiety, unhappiness or withdrawal

Signs of Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs. This is likely to result in the serious impairment of the child's health or development. Signs of neglect include:

- Frequent absenteeism from school
- Begs or steals money or food
- Lacks needed medical or dental care, immunizations or glasses
- Lacks appropriate clothing, e.g. for weather conditions, shoes are too small, ill-fitted clothes
- Clothes are consistently dirty
- Teeth are dirty, hair quality is poor and contains infestations
- Hands are cold, red and swollen
- The parent or adult caregiver has failed to protect a child from physical harm or danger

ADDITIONAL FORMS OF ABUSE

Child sexual exploitation: A form of Child sexual abuse. It occurs where an individual or groups of people take advantage of an imbalance of power to coerce, manipulate or deceive a Child into sexual activity in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. The victim may be sexually exploited even if the sexual activity appears consensual. Child sexual exploitation can also take place through the use of technology.

Peer-on-peer abuse: Children and young people can be taken advantage of or harmed by adults and by other Children. Peer-on-peer abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between Children and within Children's relationships (both intimate and non- intimate).

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

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

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

Bullying: Repeated behaviour intended to intimidate or upset someone and/or make them feel uncomfortable or unsafe, for example, name calling, exclusion or isolation, spreading rumours, embarrassing someone in public or in front of their peers, threatening to cause harm, physically hurting someone or damaging their possessions.

Cyberbullying: The use of technology to harass, threaten, embarrass, humiliate, spread rumours or target another person. By definition, it occurs among Children. When an adult is the victim, it may meet the definition of cyber harassment or cyberstalking.

Bullying as a result of any form of discrimination:

Bullying because of discrimination occurs when motivated by a prejudice against certain people or groups of people. This may be because of an individual's ethnic origin, colour, nationality, race, religion or belief, gender, gender reassignment, sexual orientation or

disability. Actions may include unfair or less favourable treatment, culturally insensitive comments, insults and 'banter'.

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

Additional Information

Should any staff member become aware of a change in domestic circumstances of a young person, they are to inform the DSL who will seek advice as this may come under private fostering legislation and the situation may need clarification.

Private fostering is an arrangement whereby a child under the age of 16 (or 18 if the child has a disability) (S.66 Children Act 1989) is placed for 28 days or more in the care of someone who is not the child's parent(s) or a 'connected person'.

A connected person is defined as a 'relative, friend or another person connected with a child'. The latter is likely to include person(s) who have a pre-existing relationship with the child, for example, a teacher who knows the child in a professional capacity.

Private foster carers can be from the extended family, e.g. a cousin or a great aunt, but cannot be a relative as defined under the [Children Act 1989, section 105](#):

'A relative under the Children Act 1989 is defined as a 'grandparent, brother, sister, uncle or aunt (whether full blood or half blood or by marriage or civil partnership) or step-parent'.

It is imperative that the local authority is notified if a child is living with someone who is not their parent or a 'connected person' for longer than 28 days. The local authority need to be satisfied that the placement is suitable and the child is safe. To be defined as 'private fostering', the child must be living with that person for longer than 28 days and this should be continuous but can include occasional short breaks.

What is the relevant legislation for private fostering?

The Children (Private Arrangements for Fostering) Regulations 2005 replaced the *Children (Private Arrangements for Fostering) Regulations 1991* and the National Minimum Standards for Private Fostering (NMS) issued under section 7 of the Local Authority Social Services Act 1970 are key pieces of legislation governing the area of private fostering. The NMS is general guidance and does not have the full force of statute, but should be followed unless there are exceptional local circumstances to justify a variation.

Code of Conduct for responsible use of Club web-pages, social networking sites, text and email

Mobile technology is a key part of everyday life and includes how and where you may find information about your football club. It is a great way to get and share information.

Within Tranmere Rovers Football Club we want you to use social networks, the internet, texts and email safely to find the information you need.

What to do	What not to do
<ul style="list-style-type: none"> • Set appropriate privacy settings on your social network site(s) • Know <u>who</u> from your football club should be contacting you and <u>how</u> they should be contacting you. If the club uses text messages or emails as a source of communication your parents may be copied into anything sent to you • Tell an adult you trust about any communications that make you feel uncomfortable or that asks you not to tell your parent/carer or coach • Talk to a person you trust or the Club Safeguarding Lead Paul Morrison 07495626014, PaulM@tranmererovers.co.uk • if you are unhappy about anything sent to you or said about you over the internet, social networking sites, text messages or via email • Tell an adult that you trust if an adult involved at your club or involved in football asks you to become their friend online and inform your club Safeguarding Officer • Abide by the club code of conduct in relation to the use of social media sites • If you want to know more about how to keep safe online explore the CEOP 'Think U Know website' for familiarise yourself with e-safety issue. 	<ul style="list-style-type: none"> • Post, host, text or email things that are hurtful, insulting, offensive, abusive, threatening, or racist as this would go against football club's rules and could also be against the law. Or post personal comments in relation to the management or operation of the club, club officials, match officials, players, opposition team member(s), or any family members of those above • Engage in any personal communications, 'banter' or comments with staff / volunteer(s), players' opposition teams • Give out personal details online including mobile numbers, email addresses or social networking account access to unknowns. • Invite any adult involved with the club to become your friends online, or accept them as a friend on any social network site. • Use internet, web-based, phone or any other form of communication to send <u>personal</u> messages of a non-football nature to any member of staff/volunteer at the club • Delete inappropriate text or email messages sent to you as they may form part of any subsequent investigation

Tranmere Rovers Football Club: Guidance for Parents and Carers

Whilst the internet brings many benefits and opportunities for players, it also opens up some new risks and challenges. The Football League and The FA have teamed up with the Child Exploitation and Online Protection (CEOP) Centre to promote online safety and vigilance. Guidance is offered for parents/carers on how to help children stay safe online. This can be found at <http://www.thinkuknow.co.uk/parents>

Please adhere to the Club policy on social media sites by following the guidelines below:

- Know who the club Safeguarding Officer is and how to make contact if you have any concerns about the content of club web pages or in relation to the welfare of your child
- Ensure you are aware of how coaches, managers and other members of the club should communicate with your child
- Show an interest in the communications between the club, you and your child. Open communication about club activities/issues often means that concerns are picked up early and issues can be resolved more easily
- Familiarise yourself with The Football League's guidance for clubs in relation to websites, text messaging and social networking sites
- Understand the club's communication practices. If the club uses text messages or emails as a source of communication you may request to be copied into anything sent to your child
- Ensure your child understands that they should tell someone that they trust about communications that make them feel uncomfortable or when they've been asked not to tell their parent/carer or coach about the communication
- Remember as a parent/carer of a child at the club you and your child are responsible for and need to abide by the club policy, The Football League Policy Guidance and The FA Rules and Regulations regarding comments that you place online about the club or club officials, The Football League, players, managers, match officials, opposing teams' players or family members of any of those groups
- Inform the club Child Protection Officer as soon as possible if you or your child receives any inappropriate communication from any member of staff/volunteer or other person associated with the club and save the communication
- Consider the Codes of Conducts of the club, The Football League and The FA as a guide to acceptable behaviour including behaviour online. The FA's Codes of Conduct give guidance on appropriate behaviour
<http://www.thefa.com/Leagues/Respect/CodesofConduct>
- Look at the guidance offered by the Child Exploitation Online Protection (CEOP) centre; they provide guidance for parents/carers, children and young people. They also provide the most up to date guidance for online environments

Guidance on Sexting: response to an incident

This document provides a brief overview for staff of how to respond to incidents involving sexting. **All** such incidents should be reported to the Designated Safeguarding Lead (DSL) Paul Morrison PaulM@tranmererovers.co.uk and managed in line with Club safeguarding policies. Procedures will follow the full 2016 guidance from the UK Council for Child ***Sexting in Schools and Colleges: Responding to Incidents and Safeguarding Young People***.

What is 'sexting'?

Sexting is defined as **the production and/or sharing of sexual photos and videos of and by young people who are under the age of 18**. It includes nude or nearly nude images and/or sexual acts. It is also referred to as 'youth produced sexual imagery'. 'Sexting' does not include the sharing of sexual photos and videos of under-18 year olds with or by adults. This is a form of child sexual abuse and must be referred to the police.

What to do if an incident involving 'sexting' comes to your attention -Report it to your Designated Safeguarding Lead (DSL) immediately.

- **Never** view, download or share the imagery yourself, or ask a child to share or download – **this is illegal**.
- If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL.
- **Do not** delete the imagery or ask the young person to delete it.
- **Do not** ask the young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL.
- **Do not** share information about the incident to other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- **Do not** say or do anything to blame or shame any young people involved.
- **Do** explain to them that you need to report it and reassure them that they will receive support and help from the DSL.

If a 'sexting' incident comes to your attention, report it to your DSL.

For further information

Download the full guidance [Sexting in Schools and Colleges: Responding to Incidents and Safeguarding Young People](#) (UKCCIS, 2016) at www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis.

Purpose

This policy will set out how individuals can raise concerns about the safety and welfare of children, young people and vulnerable adults involved at Tranmere Rovers.

It will provide a method of raising concerns and how they can receive feedback on any action taken. Tranmere Rovers will ensure individuals will:

- Receive a response to their concerns.
- Be made aware of how to pursue the concern further if they are not satisfied with the response.
- Be re-assured that individuals will be protected from reprisals or victimisation for whistle blowing in good faith.

Scope

Everyone involved in activity carried out under the jurisdiction of Tranmere Rovers are covered by this policy.

Policy Statement

Players, coaches, officials, parents or team followers are often the first to realise that a child's safety and welfare are under threat. However, they may not express their concerns because they feel that speaking up would be too difficult to handle. It may also be that they fear harassment or victimisation.

In these circumstances, it may be easier for them to ignore the concern rather than report what may just be a suspicion of poor practice. Tranmere Rovers would urge anyone to come forward and voice those concerns.

This policy details how individuals can raise a matter of concern without fear of victimisation, subsequent discrimination or disadvantage. The policy is intended to encourage and enable individuals to raise serious concerns within Tranmere rather than overlooking a problem or blowing the whistle outside.

It is in the interest of all concerned that disclosure of potential abuse or irregularities are dealt with properly, quickly and discreetly.

Confidentiality

Tranmere Rovers will do its utmost to keep confidential the identity of a whistle-blower. Should any allegations be made through whistleblowing it should be noted that a statement may be needed to form part of the evidence.

Should the whistle-blower need to be identified or it becomes apparent that the whistle-blower will be identified because of any subsequent investigation, notice will be given to the whistle-blower, by the club's Safeguarding Officer to which persons the identity disclosure will be made, with a chance to discuss any likely consequences.

Raising a Concern or Making an Allegation

Anyone wishing to raise a concern should do so either verbally or in writing to the Safeguarding Officer, Paul Morrison (PaulM@tranmererovers.co.uk) The concern needs to be as specific as possible including any names, dates and locations where possible. The burden of proof does not lie with the person raising the concern. Should any concerns or allegations be made, Tranmere Rovers would encourage the whistle-blower to put their name to the allegation. Any concerns or allegations that are anonymous are much less powerful and are therefore much harder to prove. Should Tranmere Rovers receive any anonymous allegations these, of course, will be investigated. If, after the course of an investigation, it has been found that the concerns or allegations are untrue or have not been substantiated then no action will be taken against the whistle-blower. Be taken against them. In such cases, Tranmere Rovers' disciplinary policy/procedure will apply.

All investigations will be undertaken by the Safeguarding Lead who may be supported by an appropriate member of the Senior Management Team. However, should you feel that you have not received a satisfactory response to your concern you can approach the following people/organisations

:

- Child Protection Advisor, the Football League, Operations Centre, EFL House 10-12 West Cliff, Preston, PR1 8HU. ahussey@football-league.co.uk
- Tel: 01772 325811
- The FA/NSPCC Child Protection 24-Hour Helpline 0808 800 5000
- www.FootballSafe@TheFA.com
- Or by going direct to the Police and/or Social Services

Appendix: Wirral Borough Council

How to make allegations against adults working with children

The Local Authority Designated Officer for Allegations (LADO) must be told of allegations against adults working with children and young people within 24 hours. This includes all cases where a person is alleged to have:

- behaved in a way that has harmed, or may have harmed a child
- possibly committed a criminal offence against, or related to, a child
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children

The Local Authority Designated Officer for Allegations (LADO) in Wirral is Suzanne Cottrell, 0151 666 4582 email suzannecottrell@wirral.gov.uk

If judged appropriate during the initial contact with the LADO, an Allegations Referral Form must be completed by the senior manager in full and forwarded to the LADO via email within 24 hours.

In the absence of the LADO calls will be taken by the duty safeguarding team on **0151 6664442**.

The LADO can only provide advice and guidance regarding allegations in relation to a person in a position of trust. Any general safeguarding enquiries or concerns should be reported to Wirral Children's Services on 0151 606 2008 or 0151 677 6557 out of hours.

The LADO cannot provide advice to professional's subject to allegations, support and investigation updates should be sought directly from the investigating agency or employer.

Policy reviewed 19th September 2019 PM

