



Dover Athletic Football Club Safeguarding Children Policy

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Introduction

This policy applies to anyone working on behalf of Dover Athletic Football Club (DAFC), Dover Athletic Community Trust (DACT) and Dover Athletic Youth Section (DAYS), including the board of directors (DAFC), the board of trustees (DACT), the committee (DAYS), paid staff, volunteers, sessional workers, agency staff, outside agencies and students.

Collectively and individually, we take our responsibilities to safeguard the welfare of children very seriously and we continuously strive to make our activities ever more inclusive, safe and enjoyable for every child.

Staff will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child.

Policy Statement

Dover Athletic Football Club (DAFC) recognises and is committed to its collective and individual responsibilities to help safeguard children, across all aspects of its organisation. This includes staff, volunteers, contractors and commissioned service providers. DAFC is committed to ensuring our safeguarding policies for children are at the centre of all that we do to provide a safe, fun and inclusive environment for all. The welfare of children who participate in our activities and events, visit our venue and work or volunteer is paramount.

This policy will provide all staff, directors, trustees and committee members with the framework they need to keep children and young people safe. It will be used to inform parents and carers of how we will safeguard children and young people whilst they are in our care.

Safeguarding Responsibilities

Safeguarding is the responsibility of everyone within the football club: this includes staff, volunteers, contractors and commissioned service providers. For safeguards to be effective

across the football club, we recognise the need for proactive leadership from directors, trustees and committee members.

There are staff appointed at all levels of the football club with specific designated safeguarding responsibilities. Their roles are to advise and guide, drive the implementation of safeguards across the Trust and work with colleagues to monitor compliance with the safeguarding requirements and to manage safeguarding and child protection concerns and referrals.

Safeguarding Principles, Culture and Safer Working Practice

All staff, volunteers, directors, trustees and committee members must understand:

- That safeguarding is everyone's responsibility.
- Creating fun, safe and inclusive environments should be at the heart of everything we do, to support the best outcomes for children.
- How our behaviours and actions can make a difference.
- The importance of ensuring that children and young people have a voice and are heard.
- The role and duties of those with specific safeguarding responsibilities.
- When and how to report concerns relating to our organisation.
- The process to use when a concern does not relate to our organisation.

A range of supporting procedures and guidance are applied across the football club, ensuring appropriate safeguards are applied to specific contexts.

Everyone has a responsibility to consistently and continuously apply the procedures and guidance.

Safer Recruitment

DAFC is committed to recruiting safely and fairly. This includes:

- Ensuring DBS checks are undertaken and renewed in line with the Disclosure and Barring Service.
- Creating a culture of ongoing vigilance, including:
 - The use of inductions which incorporate safeguarding.
 - Ensuring safeguarding responsibilities are embedded in staff and volunteer role profiles and are reviewed, as part of regular reviews of objectives, with line managers and Trustees.
 - Taking up references and checking qualifications/professional registrations.
- Ensuring contractors and commissioned service providers operate safer recruitment practices.

DAFC is committed to ensuring all staff, volunteers, directors, trustees and committee members receive a safeguarding induction and training, appropriate to the level and requirements of their role, which are both regularly updated.

Appropriate Behaviours and Abuse of Trust

Everyone who works or volunteers with children is responsible and accountable for the way in which they behave towards them and every child has the right to be treated with respect and dignity.

Harming or abusing a child is never acceptable under any circumstances and must be reported to the relevant statutory agency, in line with the relevant reporting procedures. Poor practice is unacceptable and must be treated seriously with appropriate actions taken.

It is expected that all adult-child relationships always maintain clear and appropriate boundaries, are supportive, positive and aimed at improving the child's skills, development and progress.

The Sexual Offences Act 2003 prohibits someone in a position of trust, within certain regulated environments, to engage in sexual activity with a child in their care, including where the child is

over the age of consent (16 or over). Whilst sport is not a regulated environment under The Sexual Offences Act 2003, DAFC considers it appropriate to apply this principle and it is underpinned by our safeguarding regulations, rules and policies.

Position of Trust means any position where an individual is in a relationship of trust with any person with responsibility and/or authority in relation to that person, and shall include without limitation those who care for, advise, supervise, train, coach, teach, manage, tutor, mentor, assess, develop, guide, treat or provide therapy to children.

No intimate or sexual relationship should take place while a member of staff or volunteer is in a Position of Trust with a child. In addition, inappropriate, intimate or sexual relationships between an adult and a child aged 16 and 17 may be unlawful, irrespective of gender and sexual orientation.

Therefore, if an adult engages in an intimate or sexual relationship with an under 18, it is a breach of DAFC regulations and as such may result in disciplinary action. Where appropriate, referral will be made to the statutory agencies, including the police, applicable Local Authority bodies and to the Disclosure and Barring Service (DBS). Where a Position of Trust exists, it does not make any difference whether the relationship is consensual. **The imbalance of power makes it an abuse of the Position of Trust.**

Contextual Safeguarding

Children are engaged in physical places and spaces beyond their families through both sport and non-sport activities. Therefore, DAFC is committed to recognising Contextual Safeguarding principles in its safeguarding practice.

Radicalisation

Radicalisation shares similarities with other forms of exploitation and grooming, it is therefore a safeguarding issue which DAFC must be aware of. We recognise that this may pose a risk to those participating in our activities and visiting our venue, so we must consider these factors when implementing safeguards to protect children.

Additional Vulnerability

DAFC recognises that some children are disadvantaged by their experiences. This could be as a result of family circumstances, poverty, discrimination, disability, mental health, domestic violence, child abuse, or substance and alcohol misuse. The more challenges facing a child, the greater their vulnerability to abusive behaviour, grooming, exploitation and/or radicalisation. We recognise these additional vulnerabilities and consider them when implementing our safeguards to protect children.

Safeguarding Training and Development

DAFC is committed to ensuring all staff, volunteers and trustees receive a safeguarding induction and training, appropriate to the level and requirements of their role, which are both regularly updated. Regular audits of safeguarding training will be carried out, to ensure everyone has received the adequate safeguarding knowledge they need for their role. Legislation and statutory guidance will be regularly reviewed and any updates to safeguarding policies and procedures will be delivered as additional training.

Working in Partnership with Statutory Agencies

DAFC is committed to working in partnership with local and national statutory partners, including the police, Children's Social Care, Local Safeguarding Children Partners and the Disclosure and Barring Service (DBS) in accordance with their procedures. Multi-agency working is essential to enable partner organisations to carry out their statutory duties to investigate concerns and protect all children.

Responding to Concerns

Concerns about a child's welfare (including possible abuse)

If there is a concern about a child, or an adult's behaviour towards a child, or a child that is not at immediate risk of harm, the concern must be reported to the Club Welfare Officer.

If there is a concern that a child is at risk of immediate harm, contact should be made with either the police or Local Authority Children's Services or the NSPCC Helpline. The Club Welfare Officer should also be contacted to inform them of the action taken as soon as is realistic.

Poor Practice Concerns (FA Guidance) the FA takes Poor Practice seriously. All cases should be dealt with in line with the relevant football authorities safeguarding and disciplinary procedures. To allow Poor Practice to continue unchallenged may result in an environment developing in which abuse may be able to take place and subsequently have negative effect on a football environment and culture. If unchallenged, unacceptable behaviour may become normalised. If the concern is one of Poor Practice, the relevant football authorities' procedures should be followed.

Whistleblowing

Whistleblowing can be used as an early warning system or when it's recognised that appropriate actions have been taken. It is about revealing and raising concerns over misconduct or malpractice within an organisation or within an independent structure associated with it. Anyone with concerns about an individual or an organisation's practice can contact the DAFC Club Board Safeguarding Champion. Alternatively, you can report concerns to:

- The FA's Safeguarding Team
- The police
- Children's Social Care
- Child Protection in Sport Unit
- NSPCC

Safeguarding Complaints

All complaints must follow due process, and the escalation stages outlined in the Responding to Concerns section of this document.

Confidentiality and Information Sharing

DAFC are committed to ensuring that the confidentiality of all disclosures, safeguarding incidents and allegations and wellbeing concerns, is maintained for all concerned. Information should be handled and disseminated on a 'need to know' basis only, including with relevant partners, in order to ensure that children are kept safe. Information will be stored securely and handled in accordance with data protection legislation and each of the relevant authorities' data protection and safeguarding privacy policies.

Online Safety

DAFC recognises that children and young people are growing up in an increasingly complex world, living their lives on and offline. This presents many positive and exciting opportunities, but we recognise it also presents challenges and risks. Any child or young person can be vulnerable online, and their vulnerability can fluctuate depending on age, developmental stage and personal circumstance.

Policy Review

This policy will be reviewed and updated every year, or sooner where there is significant change within the FA, or where there are legislative or statutory changes.

Glossary of Terms

Abuse of children is defined as – a violation of a child’s human or civil rights by any other person or persons and, for the purpose of safeguarding, shall include physical abuse, emotional abuse, sexual abuse, neglect, bullying and hazing. Abuse may be a single act or omissions or a series of acts or omissions.

Child means anyone who has not yet reached their 18th birthday.

Child protection is a part of the safeguarding process requiring immediate action to protect an individual that has experienced or has been identified as being at risk of experiencing significant harm or abuse.

Contextual Safeguarding is an approach to understanding and responding to the risk of harm or incidents of harm to which children can be exposed or which they can experience, beyond their families. Children form relationships with their peers and adults within places and spaces (contexts) where they live and participate in activities. This could include our environments. Parents/carers may have little influence over these contexts, the risk of harm to which children can be exposed, or harm which they experience, outside of the family.

Designated Safeguarding Person means an individual allocated to take responsibility for, manage, and/or undertake specific safeguarding responsibilities e.g. Head of Safeguarding, Safeguarding Officer, Club Welfare Officer etc.

Disclosure and Barring Service (DBS) refers to the executive non-departmental public body, sponsored by the Home Office, and established to help organisations make safer recruitment decisions by processing and issuing DBS checks for England, Wales, the Channel Islands and the Isle of Man. DBS also maintains the adults’ and children's Barred Lists and determines whether an individual should be included on one or both lists and is therefore barred from engaging in certain activity.

Harm is defined as – ill treatment and forms of ill treatment (including sexual abuse and forms of ill treatment which are not physical) and the impairment of or an avoidable deterioration in physical or mental health and the impairment of physical, intellectual, emotional, social or behavioural development. ‘Harm’ may be caused by acts of commission and acts of omission.

Poor Practice means behaviours which contravene existing codes of conduct, infringes an individual’s rights and/or reflects a failure to fulfil high standards of care.

Position of Trust means any position where an individual is in a relationship of trust with any person with responsibility and/or authority in relation to that person, and shall include without limitation those who care for, advise, supervise, train, coach, teach, manage, tutor, mentor, assess, develop, guide, treat or provide therapy to children.

Radicalisation is the action or process of causing someone to adopt radical positions on political or social issues, which can result in children becoming radicalised and committing acts of terrorism. Terrorism involves committing violent acts of political, religious or ideological reasons, and these acts can be committed as part of an organised group or alone. Examples of extremism includes, but are not limited to, Islamic Extremists and Right-Wing Extremist groups.

Safeguarding and promoting the welfare of children is:

- Protecting children from maltreatment.
- Preventing impairment of children’s mental and physical health or development.
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

Staff means any full and part time staff (whether paid or unpaid), volunteers, consultants and those providing a contracted service.

Welfare and Wellbeing

- **Welfare** describes a child’s health, happiness, safety, prosperity and general wellbeing.
- **Mental wellbeing** describes the wider set of feelings and thoughts that influence emotions and day-to-day behaviour. Having good mental wellbeing can strengthen a child’s resilience to developing a mental health problem – or help a child cope better with an existing mental health problem. A child’s mental wellbeing can change from day-to-day, month-to-month or year-to-year. They may:
 - Feel relatively confident in themselves, they value and accept themselves and judge themselves on realistic and reasonable standards.
 - Feel and express a range of emotions.
 - Feel engaged with the world around them – they can build and maintain positive relationships with other people and feel they can contribute to your community.
 - Live and work productively.
 - Cope with the stresses of daily life and manage times of change and uncertainty.

Definitions of Abuse

Physical Abuse is 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 is 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 in all types of maltreatment of a child, though it may occur alone.

Sexual Abuse is perpetrated by both men and women. Children can also abuse other children (see Peer on Peer Abuse). 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.

Grooming very commonly plays a key part in the sexual abuse of children. It refers to a process by which an individual manipulates those around them – typically (but not only) the child – to provide opportunities to abuse. It can involve communication with a child where this is an intention to commit a sex offence in person and/or online.

Child Sexual Exploitation (CSE) is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 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 have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can occur through the use of technology.

Neglect is 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.)
- Ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Bullying is the use of aggression with the intention of hurting another person, this may be by an adult towards a child, or peer on peer abuse. Bullying results in pain and distress to the victim. Bullying can be:

- Emotional, being unfriendly, excluding (emotionally and physically), sending hurtful text messages, tormenting (e.g. hiding football boots/shin guards, threatening gestures.)
- Physical pushing, kicking, hitting, punching or any use of violence.
- Sexual unwanted physical contact or sexually abusive comments.
- Discriminatory comments, jokes about or targeted abuse aimed towards disabled children, homophobic, transphobic, sexist, gendered, racist or faith-based comments.
- Verbal name-calling, sarcasm, spreading rumours, teasing.

Cyberbullying is when a person uses technology i.e. mobile phones or the internet (social networking sites, chat rooms, instant messenger, tweets) to deliberately upset someone. This could take the form of posting derogatory abusive comments, videos or images on social media. Bullies often feel anonymous and 'distanced' from the incident when it takes place online and 'bystanders' can easily become bullies themselves by forwarding the information on.

Extremism goes beyond terrorism and includes people who target the vulnerable – including the young – by seeking to sow division between communities on the basis of race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in our society. Extremism is defined in the Counter Extremism Strategy 2015 as the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and

tolerance of different faiths and beliefs. Calls for the death of members of our armed forces is classed as extremist.

County Lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other forms of 'deal line'. They are likely to exploit children (disabled children are particularly vulnerable) to move and store the drugs and money, and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

Child Criminal Exploitation (as set out in the Serious Violence Strategy, published by the Home Office), is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology. Children can abuse other children. This is often referred to as **Peer on Peer Abuse**. This is most likely to include, but may not be limited to:

- Bullying (including cyberbullying.)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- Sexual violence, such as rape and sexual assault.
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse.
- 'Upskirting' which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- Sexting (also known as youth produced sexual imagery.)
- Initiation/hazing type violence and rituals.

Honour Based Violence (HBV) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including **Female Genital Mutilation (FGM)** and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Forced Marriage involves forcing someone into a marriage and is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause someone to enter into marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where no consent is given, or where consent cannot be given (if there are learning difficulties or disabilities for example.) Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage.

Domestic Abuse is any type of controlling, bullying, threatening or violent behaviour between people in a relationship. It can seriously harm children and witnessing domestic abuse is child abuse. It's important to remember domestic abuse:

- Can happen inside and outside the home.

- Can happen over the phone, on the internet and on social networking sites.
- Can happen in any relationship and can continue even after the relationship has ended.
- Both men and women can be abused or abusers.

Legislation and Statutory Guidance

This safeguarding policy statement is underpinned by the following legislation and statutory guidance:

- UN Convention on Rights of the Child (UNCRC) 1989
- Sexual Offences Act 2003
- Mental Capacity Act 2005
- The Children Act 1989, 2004
- The NSPCC/Sport England Child Protection in Sport Standards (2005 revised 2018)
- Safeguarding Vulnerable Groups Act 2006
- The Equality Act 2010
- Protection of Freedoms Act 2012
- Care Act 2014
- Counter Terrorism and Security Act 2015
- Children and Social Work 2017
- Working Together to Safeguard Children 2018 (revised 2023)
- Keeping Children Safe in Education 2020

Important Names and Contact Numbers

Club Welfare Officer – Vikki Pawley – 07597561202 – vikki.pawley@doverathletic.com

DACT Safeguarding Trustee/DAFC Club Board Safeguarding Champion – Deborah Harrison – 01304 822373

Kent FA Safeguarding Team – Lucy Kidd – 01622 792140 – safeguarding@kentfa.com

The FA Safeguarding Team – 0800 169 1863 – safeguarding@TheFA.com

Kent Police – 101 or 999 if there is immediate risk of harm

NSPCC – 0808 800 5000 – help@nspcc.org.uk

Children Protection in Sport Unit – cpsu@nspcc.org.uk

LADO Service – 03000 410888 – kentchildrenslado@kent.gov.uk

Integrated Children’s Services/Children’s Social Work Services – Front Door – 03000 411111 – Out of Hours number – 03000 419191

Kent Safeguarding Children Multi-Agency Partnership (KSCMP) – 03000 421126 – kscmp@kent.gov.uk – www.kscmp.org.uk

Adult Social Care via 03000 416161

Support Organisations

National Organisations

NSPCC
Barnardo's
Action for Children
Children's Society
Centre of Expertise on Child Sexual Abuse

www.nspcc.org.uk
www.barnardos.org.uk
www.actionforchildren.co.uk
www.childrenssociety.org.uk
www.csacentre.org.uk