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# **NOTTINGHAM FOREST FOOTBALL CLUB**

## **SAFEGUARDING CHILDREN POLICY 2020-21**

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# 1. INTRODUCTION AND SCOPE

The safety and welfare of children under the care of Nottingham Forest Football Club (“the Club”) is paramount. All participants in Club activities and visitors to the Club have a right to feel safe and be safe. All members of staff have a duty to keep children safe and help protect them from abuse or harm.

All children that engage with the Club, regardless of age, culture, social background, disability, gender, language, racial origin, religious belief and/or sexual identity have the right to feel safe and protected from abuse, exploitation and poor practice, and have their welfare promoted.

All suspicions, reports and/or allegations of abuse will be taken seriously and investigated thoroughly, which may involve the appropriate local authority teams where necessary.

Nottingham Forest Football Club acknowledges its duty of care to safeguard and promote the welfare of children and is committed to ensuring safeguarding practice reflects statutory requirements and responsibilities, government guidance, recognised best practice and complies with English Football League and football league rules.

The Club expects all staff, players, volunteers, partners, contractors and guests to share this commitment.

The Club commits to employing Designated Safeguarding Officers who implement, maintain and monitor best practice across the Club.

This safeguarding policy is applicable to the season 2020/21 and will be monitored and reviewed at least once a year, or whenever there is a change in legislation, organisational change or following any learning outcomes or serious case reviews from safeguarding incidents, concerns or allegations. Any review and change in policy will be conducted in consultation with the Local Safeguarding Children Board.

## **Aims of this Policy**

- To safeguard all children and young people who interact with the Club.
- To demonstrate best practice in the area of safeguarding children.
- To increase awareness and understanding of safeguarding issues Club wide.
- To provide guidance for parents and other interested parties to understand reporting procedures.
- To encourage a partnership between the Club and parents/carers of children associated with the Club.
- To ensure that coaches, parents and other adults who come in contact with children and young people understand their safeguarding responsibilities and provide good role models of behaviour.
- To promote high ethical standards throughout the Club.

## 2. KEY SAFEGUARDING TERMINOLGY AND DEFINITIONS

**The Club** – Nottingham Forest Football Club, its staff and all activities it undertakes. In certain circumstances it may also refer to third parties with an entrusted responsibility for delivering Club-supported activity.

**The Trust** - Nottingham Forest Football in the Community, its staff and all activities it undertakes. In certain circumstances, it may also refer to third parties with an entrusted responsibility for delivering Club-supported activity.

**The Academy** – The standalone Academy department within the Club which is responsible for nurturing and developing the Club's future generations of players. The Academy is based at an independent site external to the Club's City Ground. It is also the location of the Club's Training Ground.

**Staff** – Persons employed by and receiving payment for services from the Club or Trust. This is irrespective of the length or nature of their contract.

**Volunteers** – Persons who freely offer their skills and expertise or take part in a task, event or enterprise with the Club or Trust at their own expense in terms of time and/or resources.

**Child** – Defined in The Children Act (1989) as any person under the age of 18.

**Safeguarding** – Preventative and reactional measures taken by the Club and Trust to ensure:

- the risk of harm or mistreatment to the welfare of vulnerable groups is minimised
- the health and wellbeing of vulnerable groups is not impaired when engaging in Club or Trust related activities
- an environment exists that allows vulnerable groups to be cared for safely and allows for the best possible outcomes for them and provides them with the best life chances possible.

**Welfare** – The health, happiness and fortunes of an individual and the humanitarian aspects of their life including personal need and physical and mental development.

**Significant Harm** - The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interests of children. Section 47(1) of the Children Act 1989 states that: *Where a local authority... has reasonable cause to suspect that a child who lives, or is found, in the area and is suffering, or is likely to suffer, significant harm, the authority shall make, such enquiries as they consider necessary to enable them to decide whether they should take any action to safeguard or promote the child's welfare.'*

**Child Protection** - The process of protecting individual children identified as either suffering, or likely to suffer, significant harm as a result of abuse or neglect. It involves measures and structures designed to prevent and respond to abuse and neglect.

**Child Abuse** - Acts of commission and omission, which result in harm to the child. Types of abuse include physical abuse, sexual abuse, emotional abuse and neglect.



## **Rules, Regulations and Guidance**

The Club is governed by the legislation and rules / regulations set out by several key governing agencies including the Government, Football Association, English Football League and the NSPCC Child Protection in Sport Unit. The content of this policy is underpinned by the following legislative documents and polices:-

The Children Act 1989 - HM Government

Every Child Matters 2003 - HM Government

Safeguarding Vulnerable Groups Act 2006 - HM Government

Working Together to Safeguard Children 2019 - HM Government

Keeping Children Safe in Education 2020 – HM Government

Protection of Freedoms Act 2012

What to do if you are worried about a child being abused 2015

Human Rights Act 1998 – HM Government

Standards for Safeguarding and Protecting Children in Sport 2005 - NSPCC CPSU

Safeguarding Children and Young People. Guide to Member Clubs and Community Trusts 2017 – EFL

Nottinghamshire Area Child Protection Procedures - Nottinghamshire County Council

The Sexual Offences Act 2003

Education Act 2002

Counter Terrorism and Security Act 2015

## 3. RESOURCES AND TRAINING

### 3.1 Identified Resources

The Club will ensure there are qualified and designated individuals within the organisation that will take the lead on ensuring that the Club does all it can to meet its statutory and moral obligations.

The key individuals are:

Julian Taylor - Lead Designated Safeguarding Officer – Club  
[julian.taylor@nottinghamforest.co.uk](mailto:julian.taylor@nottinghamforest.co.uk)

Chris Caunt – Academy POC  
[chris.caunt@nottinghamforest.co.uk](mailto:chris.caunt@nottinghamforest.co.uk)

Richie Holmes - Designated Safeguarding Officer – Trust  
[richie.holmes@nottinghamforest.co.uk](mailto:richie.holmes@nottinghamforest.co.uk)

Paul Lewis – Designated Safeguarding Officer – Club (Match Days)  
[paul.lewis@nottinghamforest.co.uk](mailto:paul.lewis@nottinghamforest.co.uk)

### 3.2 Lead Designated Safeguarding Officer – Club

The Lead Designated Safeguarding Officer for the Club has responsibility for overseeing and directing the safe provision of all activities and associated training relating to children and young people, providing leadership and guidance on all safeguarding matters and relevant legislation, along with implementing safeguarding awareness and best practice Club across the Club, Academy and Trust. Key duties are:

- Manage the implementation of the Club's strategy and action and implementation plan for Safeguarding.
- Ensure Club compliance with statutory obligations under relevant legislation and the English Football League Safeguarding rules.
- Work closely with HR and heads of departments to develop and implement safer recruitment and induction practices across the Club.
- Continuously work to maintain, embed and improve the Club's safeguarding provision ensuring the highest standards for safeguarding vulnerable groups.
- Manage the development, implementation, promotion and review of the Club's safeguarding vulnerable groups' policies, practices and good practice guidelines.
- Lead members of staff in managing safeguarding incidents, concerns and allegations.
- Lead members of staff in working in partnership with statutory and football authorities, sharing information where appropriate to safeguard vulnerable groups.
- Maintain accurate, confidential and up to date records on all safeguarding incidents, concerns and allegations.
- Give direction and guidance to staff in respect of safeguarding incidents, concerns and allegations.
- Support staff to respond appropriately to concerns about the welfare or safety of vulnerable groups.
- Lead and provide direction to Safeguarding Officers.

- Ensure that Safeguarding Officers are trained, supported and supervised.
- Act as the Club's lead source of safeguarding support, advice and expertise.
- Ensure staff understand their individual responsibilities to safeguard and promote the welfare of vulnerable groups.
- Develop relationships with statutory and football authorities.
- Attend regular safeguarding training and maintain an up to date knowledge base of relevant legislation, regulations and best practice.

### **3.3 Designated Safeguarding Officers (DSO) (Academy, Trust and on Matchdays)**

The DSOs support the Club's Lead Designated Safeguarding Officer to proactively promote and raise safeguarding awareness and assist with responding appropriately to safeguarding concerns and allegations. DSOs are based in strategic positions across the Club.

The Club's Safeguarding Officer will ensure that suitable policies and practices are in place to ensure that staff are appropriate and adequately trained to prevent or deal with safeguarding issues. Key duties are:

- Work with the Club's Safeguarding Officer to implement and promote the Club's safeguarding policies and procedures within their department.
- Contribute to maintaining and improving the Club's safeguarding provision.
- Advise others working with vulnerable groups on the implementation of organisational policies and procedures to safeguard and promote the welfare of vulnerable groups.
- Ensure staff understand their individual responsibilities to safeguard and promote the welfare of vulnerable groups.
- Act as a source of safeguarding support and advice within their department.
- Support colleagues to respond appropriately to concerns about the welfare or safety of vulnerable groups.
- Promote a safe working environment.

### **3.4 Safeguarding Training & Induction**

A safeguarding induction is provided to all staff. This will be delivered by the Club's Safeguarding Officer or Designated Safeguarding Officer.

New staff coming into contact with children will complete the EFL Online Safeguarding Essentials course. Key elements of the Club Safeguarding Policy are discussed in more detail and specifically to the individual's role.

All staff working in direct contact with children, either through coaching or in a medical capacity, are required to complete the FA's 3-hour Safeguarding Children Awareness workshop and undertake a refresher course at least once every 3 years. Details of those satisfactorily completing this course are retained on a Single Central Record.

All staff will undertake a specific safeguarding and safer working practices induction upon employment at the Club. An Employee Handbook will be provided. There is an expectation that staff will read the guidance and sign a declaration of agreement and understanding.

Staff in roles that require contact with adults at risk, young people and children will undergo enhanced DBS disclosure upon appointment, with rechecking every 3 years throughout the individual's association with the Club.



### **3.5 Work Experience**

Nottingham Forest Football Club may occasionally offer work experience placements to young people, usually via the HR department. Whilst undertaking work for the Club, those on work experience will not have unsupervised access to children.

### **3.6 Recruitment**

The Safer Recruitment Policy sets out in detail the process the Club undertakes in ensuring staff are suitable to work with children and adults at risk. A copy is available if required.

The Club is registered with GBG Online Disclosures to conduct DBS checks on individuals who require them. Enhanced DBS checks, plus barred list checks where appropriate, enable the Club to undertake more thorough recruitment and selection procedures for positions which involve working with children.

### **3.7 New Appointments**

All staff who are offered a position which involves an enhanced DBS with barred list check will be required to complete an EFL Self-Declaration Form. All offers of work are subject to the outcome of the screening process and where applicable, this is set out in the initial job advertisement and the applicant's offer of work. Until such time as a satisfactory DBS has been received, the member of staff will not be permitted to work with children.

The Club is committed to providing equal opportunities to staff and therefore a positive DBS will not necessarily result in a bar from work. Should a positive check be received, a risk assessment will be carried out by the Club's Safeguarding Officer, relevant Head of Department, the Head of HR or Lead at Nottingham Forest in the Community (or designate), to assess the information contained within the check. The FA Safeguarding team will also make their own assessment and present their decision of the applicants suitability for the role to the Lead Designated Safeguarding Officer of the club.

The member of staff may also be asked to attend an interview prior to a recruitment decision being made. The Rehabilitation of Offenders Act and Protection of Freedoms Act will be considered in all cases before a final decision is made.

### **3.8 New Appointments who already have a DBS**

If a new member of staff has been subject to a DBS check by their previous employer, the Club will still require a further check unless that check was undertaken in a football context. Advice should be sought from the Lead DSO.

### **3.9 Temporary Staff and External Consultants**

The Club will ensure that all temporary staff and external consultants sign a self-declaration form where appropriate and, in any case, will not have unsupervised access to children during their time with the Club.

### **3.10 Equal Opportunities and Equality**

Nottingham Forest Football Club is committed to providing equal opportunities for all staff, players and supporters. A copy of the Club's policy on equal opportunities and the equality policy can be obtained from the HR department.





### **3.11 Activities for Disabled Persons**

All activities carried out for disabled persons are carried out under the guidelines of the Equality Act 2010.

### **3.12 Contractors**

All external contractors engaged by Nottingham Forest Football Club undergo a suitability test prior to commencing work. This will include evidencing the contractor's Safety Record, Safety Policy, Liability Insurance, Risk Assessment and details of Competent Person.

On arrival at the Club, the contractor will receive a site induction from a member of the Safety & Security team which covers safeguarding children and gives details of the Club's expected code of behaviour. Whilst on site, contractors are subject to regular inspection from Club staff. In the event of a contractor carrying out work in an area that is usually occupied by children this work, where possible, will be undertaken when children are not present.

### **3.13 Service Level Agreements**

The Club commitment to safeguarding is outlined in any partnership agreements, service level agreements or any other agreements that are in place with any service provider or for commissioned services insofar as those services relate to children.

## 4. WORKING AT/FOR NFFC

### 4.1 Ratios and Supervision of Children

Any activity undertaken by the Club will always give full consideration to the appropriate number of staff members available depending on the age of the children involved, the degree of risk the activity involves, and whether there are any additional disability needs. The lower the age of the participants, the greater the need for supervision.

Regardless of these ratios, a minimum of 2 members of staff or delivery partner will always be available to supervise an Activity. This ensures at least basic cover in the event of something impacting on the availability of one of the adults during the Activity (e.g. in the event of a participant requiring the attention of an adult during the Activity following an accident).

- For children under 8 the recommended ratio should be no more than 1:8.
- For children over 8 the recommended ratio should be no more than 1:16, but this varies depending on the Activity. Advice should be sought from the Club's Safeguarding Officer if unsure.
- For Academy Activities, the EFL's Youth Development Rules prescribe a ratio of 1 Coach to 8 Players (over 8s).
- For organised groups of children attending a match day at the City Ground, the minimum ratio is 2 responsible adults to 20 children.
- Where Nottingham Forest Football Club is taking responsibility for the care of the children, parents/carers should not be included in supervision calculations.

### 4.2 Scouts

All Scouts undertaking work for Nottingham Forest Football Club are registered with the Football League. Scouts identifying players under the age of 18 are issued with a copy of the Club Code of Conduct and the Club's Safeguarding Children Policy. If appropriate, DBS checks will be undertaken. They are required to undertake the FA 3-hour Safeguarding Children Workshop.

Nottingham Forest Football Club only permits scouts from other Clubs to attend its Academy Games Programme matches in accordance with the provisions of the League Youth Development Rules.

### 4.3 Nottingham Forest Football Club in the Community

This is based at the City Ground, Nottingham and is currently delivering a diverse programme of sport, education and employment activities at the heart of the community, with a strategic focus of improving health and wellbeing, encouraging participation in sports and providing education and employment opportunities for people of all ages and backgrounds across the City and County of Nottingham.

All staff working with children and young people within the Community have completed the EFL Safeguarding Essential online course, attended the FA Safeguarding Workshop and enhanced DBS check. Specific codes of conduct for staff and players within the Trust are available, along with a social media policy.



#### **4.4 Nottingham Forest Football Club Academy**

The Nottingham Forest Football Club Academy aims to continue its vision and philosophy that has been installed within the last few years. The Academy has a tradition and reputation for producing players that have the opportunity to play for the senior team.

The Academy promotes and supports good outcomes in terms of health, development and educational achievement for its young players, and acknowledges its responsibility to set the highest football, social and academic standards.

All staff working within the academy have attended the FA Safeguarding Workshop and enhanced DBS checks. Specific codes of conduct for staff and players within the Academy are available, along with a social media policy for staff and players.

#### **4.5 Host Families**

Prior to the commencement of an agreement between the Nottingham Forest Football Club and a host family, an enhanced DBS plus barred list check is carried out on the designated house parent, along with an enhanced check on any other person residing at the house who is over 16 years of age.

If any accommodation arrangements fall within the regulations of private fostering, then the Safeguarding Officer for the Club and Head of HR would ensure that suitable dialogue takes place with the relevant local authority to ensure that all statutory requirements are met.

References from previous employers and local authorities (where applicable) are also sought. House visits and full Health & Safety risk assessment are also conducted. Regular dialogue with all host families is maintained throughout the season by a nominated member of Academy staff.

#### **4.6 Youth Loans, Trials & Work Experience**

If an Academy player under the age of 18 joins another Club on trial, work experience or a Football League Youth Loan, the Academy will seek written parental consent (additional to the standard consent sought at the start of every season) prior to the activity taking place. Consideration will also be given to the player's education programme, travel and accommodation arrangements.

If the new Club is not located within a reasonable travelling distance from the player's current address, the Club will request, where possible, players are placed in host family accommodation during their time away from the Club and not in hotel accommodation, and as good practice the Club should designate a member of Academy staff to check on the players on a regular (weekly) basis, not just for game situations but for their general welfare whilst on loan, trial or work experience.

For players under the age of 18 who are joining the Club on trial (including work experience) parental consent will be sought prior to the trial taking place, along with a full medical history and injury disclaimer. Consultation will be made with the Club's HR Department prior to any agreement being made with the player/parent. Where accommodation is required during the trial period U18 players must be accommodated with an approved & vetted "Host" family whilst on trial with the club, unless there are none available. In this instance an U18 player can room at a hotel, but a responsible & CRC vetted employee of the club must also stay at the hotel for the duration of the trial. Two U18 players can share a room, but for clarification an U18



cannot share with an adult age 18+. This also includes players and the same principles apply to overnight stays for U18/U23 matches.

Transport will be arranged during the trial period via the Academy Manager or his designate.

#### **4.7 U18 Progression**

As players progress through the Academy system, they may have the opportunity to train and play with the senior team at the Club. This carries a number of safeguarding considerations as they will be entering an adult environment and will be susceptible to adult behaviours and language. The Club will support the player(s) during this transition and has guidance to assist. Parents will be included, and consent sought. The Safeguarding Officers for the Club and Academy will be notified when this takes place.

#### **4.8 Trips and Tours**

Risk assessments are carried out for all Academy trips and tours. These are designed with the health, welfare and safety of all children and staff engaged in the trip and tour. A specific Academy tours policy is available upon request.

#### **4.9 Transport Policy**

The Club has a specific transport policy to cover the safe transport of all Academy players. This is available upon request and is provided to parents of Academy players.

#### **4.10 Use of Images**

The Club takes its guidance on the use of images from guidelines issued by the FA and EFL.

All images are taken by Club officials who have been briefed by the member of staff responsible for the activity being photographed / filmed. Before taking images of children, parental consent is sought in writing at the start of each football season or prior to the event. Parents/Legal Guardians are responsible for informing the Club of any change of circumstances within the season which may affect consent. Parents/Legal 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. Where possible, the image will focus on the activity taking place and not a specific child.

Where appropriate, images represent the broad range of people participating safely in the event. Designated Club photographers will, where applicable, undertake a DBS check and attend a Safeguarding Children workshop and in any case will be personally responsible for keeping up to date with the latest guidelines on the Use of Images policies issued by the Club and by the EFL from time to time. Club identification will be worn at all times.

Children who are subject to family, care or legal proceedings, or who are under 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 school or home address.

Recordings of children for the purposes of legitimate coaching aids are only filmed by Club



officials and are stored safely and securely at the Club's premises.

Any instances of inappropriate images in football should be reported to the Club's content Editor or Safeguarding Officer immediately.

The Club does not put young player profiles with images and personal information on its website.

#### **4.11 Mascots & Ball Persons**

The Club will only allow children to be match-day mascots or ball persons once parental consent has been obtained. A signed image consent form is also required before any images are published in the Club's match-day programme. No photographs of mascots or ball persons featured in Club publications will be accompanied by personal information about the child, such as their school, home address or local sports team.

Whilst at the City Ground, mascots and ball persons are accompanied at all times by at a member of staff who if applicable will have a current DBS check and have attended the FA 3 hour Safeguarding Children Workshop.

#### **4.12 Whistleblowing Policy**

Whistleblowing refers to making a protected disclosure under the Public Interest Disclosure Act 1998. By encouraging a culture of openness Nottingham Forest Football Club wants to encourage staff to raise issues, which concern them at work. Staff have a right and duty to raise matters of concern they may have about the services being offered by the Club or serious malpractice associated with them.

Staff may be worried that by reporting such issues they will be opening themselves up to victimisation or detriment, or risking their job security. However, all staff are protected by law if they raise concerns in the right way. Provided they are acting in good faith, it does not matter if they are mistaken.

This policy is designed to ensure workers raise concerns properly and to ensure that mechanisms exist in Nottingham Forest Football Club and issues raised by staff will be addressed quickly and effectively. Although this list is not exhaustive, examples of situations in which a disclosure might be made are:

- The committing of a criminal offence.
- Failing to comply with a legal obligation
- A miscarriage of justice
- Endangering the health and safety of an individual
- Environmental damage or
- Concealing any information relating to the above.
- Attempts to conceal any of the above

Nottingham Forest Football Club has a discipline policy which can be obtained from the Human Resources department if required.

## 5 WHAT IS ABUSE AND HOW TO RESPOND

### 5.1 Definitions of Poor Practice and Abuse

Poor practice is unacceptable and will be treated seriously with appropriate action. Any behaviour that contravenes existing Codes of Conduct, infringes an individual's rights and/or reflects a failure to fulfil the highest standards of care is an indication of poor practice. A child or young person may not be aware that poor practice or abuse is taking place, as they may deem the behaviour as acceptable.

### 5.2 What is abuse?

Abuse is any form of physical, emotional or sexual mistreatment or lack of care that leads to injury or harm. It commonly occurs within a relationship of trust or responsibility and represents an abuse of power or a breach of trust. Abuse can happen to a child or a vulnerable adult regardless of their age, gender, race, ability, culture or sexual orientation.

### 5.3 Signs of abuse

There are four main forms of abuse identified below, Should you have any concern that abuse is happening, you should contact the Club's Designated Lead Safeguarding Officer or nominated Safeguarding Officer for the relevant department for advice:-

**Physical abuse:** Any deliberate act causing injury or trauma to another person, for example, hitting, slapping, pushing, kicking, burning, giving a person medicine that they do not need and/or that may harm them or application of inappropriate restraint measures.

**Emotional abuse:** Any act or other treatment which may cause emotional damage and undermine a person's sense of well-being, including persistent criticism, denigration or putting unrealistic expectations on vulnerable groups, isolation, verbal assault, humiliation, blaming, controlling, intimidation or use of threats.

**Sexual abuse:** Any act which results in the exploitation of children and adults at risk, whether with their consent or not, for the purpose of sexual or erotic gratification. This may be by an adult or by a young person who is intellectually, emotionally, physically or sexually more mature than the victim. This includes non-contact activities, such as indecent exposure, involving children or adults at risk in witnessing sexual acts, looking at sexual images/pornography or grooming them in preparation for abuse (including via the internet). Whilst legally Children aged sixteen have reached the age of consent for sexual activity, it is unacceptable for any member of Staff to abuse their relationship of trust for sexual gratification.

**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).

**Neglect:** Ongoing failure to meet the basic needs of children and/or adults at risk. Neglect may involve; failing to provide adequate food, shelter including exclusion from home or abandonment, failing to protect them from physical and emotional harm or danger, or the failing to ensure access to appropriate medical care or treatment. It may also include neglect of or unresponsiveness to, basic emotional needs. In an Activity setting, it may involve failing to ensure that children and/or adults at risk are safe and adequately supervised or exposing them to unnecessary risks.

**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 radicalised. 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 practise 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.

**Hazing:** Any rituals, initiation activities, action or situation, with or without consent, which recklessly, intentionally or unintentionally endangers the physical or emotional well-being of Vulnerable Groups

**Infatuations:** Vulnerable Groups may develop an infatuation with a member of Staff who works with them. Such situations should be handled sensitively to maintain the dignity and safety of all concerned. Staff should be aware, that in such circumstances, there is a high risk that words or actions may be misinterpreted and that allegations could be made against Staff. Staff should therefore ensure that their own behaviour is above reproach. A member of Staff who becomes aware that a Child or Adult at Risk may be infatuated with him/ her, or with a colleague, should discuss this at the earliest opportunity with the Club Designated Safeguarding Officer (or the Club Senior Safeguarding Manager in his/her absence).

**Domestic violence:** Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged sixteen or over, who are or have been intimate with partners or family members regardless of gender or sexuality. This can encompass but is not limited to psychological, physical, sexual, financial, emotional abuse and so called 'honour' based violence

**Fabricate or induced illness:** Fabricated or Induced Illness is easiest understood as illness in a child which is fabricated by a parent or person in loco parentis. The child is often presented for medical assessment and care, usually persistently, often resulting in multiple medical procedures. Acute symptoms and signs of illness cease when the child is separated from the perpetrator.

**Forced Marriage:** A marriage in which one or both spouses do not (or in the case of some adults with learning or physical disabilities or children, cannot) consent to the marriage and duress is involved. Duress can include physical, psychological, financial and sexual pressure. A Forced Marriage is different from an arranged marriage, which is a marriage entered into freely by both parties, although their families take a leading role in the choice of partner. The Anti-social Behaviour, Crime and Policing Act 2014 made it a criminal offence (which can result in a sentence of up to 7 years in prison) to force someone to marry.

**Private fostering:** A privately fostered child is a child under 16 (or 18 if disabled) who is cared for by an adult who is not a parent or close relative where the child is to be cared for in that home for 28 days or more. Close relative is defined as "a grandparent, brother, sister, uncle or aunt (whether of the full blood or half blood or by marriage or civil partnership) or step-parent". A child who is Looked After by a local authority or placed in a children's home, hospital or school is excluded from the definition. In a private fostering arrangement, the parent still holds Parental Responsibility and agrees the arrangement with the private foster carer. A child (as per definition above) placed with a host family for 28 days or more is in a private fostering arrangement and therefore Clubs with host families should inform and work with their local authority ensuring that they meet legislative and local procedural requirements.

**County Lines:** 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 form of “deal line”. They are likely to exploit children and adults at risk to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons. Child Criminal Exploitation is common in county lines and occurs 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. 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. Criminal exploitation of children is broader than just county lines, and includes for instance children forced to work on cannabis farms or to commit theft.

#### 5.4 Signs and Symptoms – Child Abuse

The list below is not exhaustive, and the presence of one or more of these indicators is not proof that abuse is taking place, although they are indicators that abuse may have taken / may be taking place:

- Unexplained or suspicious injuries such as bruising, cuts or burns, particularly if on a part of the body not normally prone to such injuries.
- An injury for which the explanation seems inconsistent.
- Disclosure of what appears to be an abusive act
- Disclosure of unsatisfactory home circumstances i.e. Domestic abuse, drugs / alcohol misuse, mental health concerns of a parent or other person within the home.
- Someone expresses concern about the welfare of the child.
- Unexplained changes in behaviour e.g. becoming quiet, withdrawn, sudden outbursts
- Oversexualised behaviour
- Variations in eating patterns including overeating or loss of appetite.
- Weight loss for no apparent reason.
- Becomes increasingly dirty or unkempt.
- Evasive parents/carers

***Remember: It is not the responsibility of staff (permanent or casual) or volunteers to decide if abuse has taken place, but it is their responsibility to act on any concerns, in accordance with this procedure.***

#### 5.5 Responding to Allegations or Suspicions

All staff, volunteers and players have a responsibility to ensure the safety and welfare of children and to take appropriate steps to ensure that suspicions and allegations of abuse are taken seriously and responded to quickly and appropriately. It is not the responsibility of anyone within the Club to decide whether or not child abuse has taken place.

Nottingham Forest Football Club recognises and acknowledges that some children face additional vulnerabilities and extra barriers, e.g. looked after children, those with mental health issues, physical disability, children living in substitute accommodation arrangements and those with communication difficulties. The Club is committed to ensuring those additional needs are met through training. Where there is a complaint against a member of staff the one of the following may occur:

- A criminal investigation led by the Police
- A child protection investigation led in a multi-agency approach by the Local Authority
- A disciplinary or misconduct investigation led by the Club, which may also involve The Football Association or English Football League.
- The Club will delay an internal disciplinary or misconduct investigation while a criminal or local authority investigation takes place.

If a member of staff suspects abuse is taking place, or a report/allegation of abuse has been disclosed to them, where possible the Club's Designated Safeguarding Officer or Academy/Trust DSO should be contacted as early as possible. However, it is recognised that an individual may need to respond to a situation immediately, and prior to such contact if the nature of the suspicion or report is putting the child concerned in immediate danger. The following guidelines offer help and support in responding to abuse or a suspicion of abuse:

Staff should:

- Listen carefully rather than question the child directly.
- Stay calm and not offer their personal opinions/thoughts.
- Be aware that medical or criminal evidence may be relevant.
- Tell the child that you are listening and taking what they say extremely seriously.
- Seek medical attention if necessary
- Take further action – they may be the only person in a position to prevent future abuse.
- Inform the Designated Safeguarding Officer for the Club, Academy or Trust or another senior member of staff if these are not available
- Write down everything said (in their words as far as possible) and what was done – accuracy and detail is important. Keep this information stored in a secure place. Concerns can be recorded on the Safeguarding reporting form (template shown below)

Staff should not:

- Offer to keep any information disclosed confidential. Say there may be occasions where you must pass the information to the Police or another adult
- Make promises they cannot keep
- Interrogate the child – it is not their job to carry out an investigation.
- Cast doubt on what the child has told them – they shouldn't interrupt or change the subject
- Say anything that makes the child feel responsible for the abuse

Staff should ensure the Designated Safeguarding Officer for the Club, Academy or Trust is informed as soon as possible. They will know how to follow this up and where to go for further advice. Staff should follow the new reporting process and log the concern on MyConcern. Any injuries seen should be noted and recorded.

### **5.7 Safeguarding Reporting – MyConcern**

Please log the concern on MyConcern and complete with full details within 24 hours. The DSO for the Club, Academy or Trust will review the concern in the first instance and refer to the LDSO if further advice or guidance is required. The LDSO will then review the concern and decide on the next course of action.



Paul Lewis, Club DSO  
[Paul.lewis@nottinghamforest.co.uk](mailto:Paul.lewis@nottinghamforest.co.uk)

Chris Caunt, Academy POC  
[Chris.caunt@nottinghamforest.co.uk](mailto:Chris.caunt@nottinghamforest.co.uk)

Richie Holmes, Community Trust DSO  
[richie.holmes@nottinghamforest.co.uk](mailto:richie.holmes@nottinghamforest.co.uk)

If the matter requires immediate action then contact:-  
Julian Taylor, Lead Designated Safeguarding Officer  
[Julian.taylor@nottinghamforest.co.uk](mailto:Julian.taylor@nottinghamforest.co.uk) m: 07468 698395

If your concern relates to a sexual assault that has taken place within the last 7 days, you must notify the DSO and the Police at the time you are advised.

If your concern relates to immediate welfare of a child, call the Police emergency number 999, or contact the Nottinghamshire Multi-Agency Safeguarding Hub (“MASH”) on 0300 5008090. For out of core hours and in an emergency, contact the Emergency Duty Team on 0300 4564546.

For all allegations relating to adults who work with children, please contact the Local Authority Designated Officer (“LADO”) on 01623 433169 or 0115 8041272. Liaison should be made with the Club DSO before contacting the LADO.

[info.nscb@nottscc.gov.uk](mailto:info.nscb@nottscc.gov.uk)  
Nottinghamshire Safeguarding Children Board, County Hall, West Bridgford Nottingham,  
NG2 7QP

## **5.8 Concerns around Radicalisation & Extremism**

The Counter-Terrorism and Security Act 2015 places a duty on specified authorities, including local authorities and childcare, education and other children’s services providers including sport, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism (“the Prevent duty”). Referral for any issue concerning potential radicalisation to extremism will be managed as any other safeguarding referral. Concerns will be referred to the local authority Chanel Team. Liaison should be made with the Club’s Designated Safeguarding Officer and/or Stadium Safety and Security personnel.

This policy is reviewed annually and presented to the NFFC Board for their approval.

**Approved by the NFFC Board**  
**Date of Review: 09/09/2020**