



MILTON KEYNES DONS

# CHILDREN AND YOUNG PEOPLE SAFEGUARDING POLICY.

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## INTRODUCTION

This policy makes it clear that within MK Dons F.C. we all have a responsibility to safeguard children, young people to protect them from harm. These procedures aim to raise awareness of how to safeguard and promote the welfare of children, young people at risk.

## PURPOSE

By following this policy and receiving appropriate training, people representing the MKD FC will:

- be able to identify potential risks in their working environment and mitigate against these risks
- know the different risks which young people at risk might be exposed to and the signs which might suggest a participant is in need of help and/or protection
- be able to respond appropriately to allegations, concerns and disclosures
- understand the roles and responsibilities of other professionals and know what to do if they are concerned about the actions others have taken.

Leaders with the MKD FC will:

- monitor the implication of this policy
- arrange and mandate regular training for all staff, which is appropriate to their role and responsibility
- ensure lessons are learnt through their own regular evaluations and feedback from other agencies
- respond to any concerns promptly which implicate CLUB staff

## DEFINITIONS

For the purposes of this policy a child or young person is defined as follows:

'Any person aged 18 and under'

## SCOPE

This Policy is for use across the Club and is to be observed by all those working and coming into contact with CYP to ensure best practice in safeguarding is promoted and adhered to. All activities undertaken by the Club are covered by this policy. All directors, employees, workers, consultants, agency staff and volunteers are made aware of the policy and procedures through induction and where appropriate their work with CYP is supported by a comprehensive on-going safeguarding training programme. The Club ensures that staff are appropriately appointed, trained and supported so that they are able to safeguard CYP. We do this through the following mechanisms:

## RECRUITMENT AND DISCLOSURE

As part of the Club's recruitment and selection process, offers of work for positions which come into contact with CYP are subject to a satisfactory self-declaration and a Disclosure and Barring Service check (DBS) as relevant, application form checks, appropriate references, right to work in the UK checks and original qualifications checked. All offers of work are subject to a satisfactory outcome to the rigorous screening process and until such time that all background checks are deemed as acceptable by the Club, the person concerned is not permitted to commence work.

All directors, employees, workers, consultants, agency staff and volunteers in a position of trust are required to undergo regular DBS disclosure clearances, normally every three years or earlier if required.

Should any person's DBS reveal any cautions, convictions, community resolutions, warnings or final reprimands the Club will consider whether the nature of the offence/offences renders the person concerned unsuitable for working with CYP. In such circumstances, when the nature of any disclosure has to be considered, a risk assessment is carried out to evaluate the information contained within the disclosure certificate. The person may also be required to attend a risk assessment meeting with a Departmental Designated Safeguarding Officer (DepDSO) and/or a member of the club's Safeguarding Team prior to a recruitment decision being made.

Further information can be found in the Club's Recruitment Policy and Safer Recruitment Guidance available on the intranet.

All new directors, employees, workers, consultants, agency staff and volunteers working with CYP at the Club are required to complete a self-declaration on commencement of duties. When the Club uses suppliers or agencies to undertake its work, they are subject to rigorous vetting and safeguarding checks and required to adhere to the Club's policy and procedures as set out in their contracts or service level agreements where relevant.

## INDUCTION AND TRAINING

During the induction process, directors, employees and volunteers who work with or come into contact with CYP are required to attend the Club's safeguarding and protection training. Directors, employees and volunteers also receive a copy of the policy and procedures documents and are required to sign an acknowledgement that they have read and agree to abide by them.

Workers, consultants, agency staff and volunteers who have roles that work with or come into contact with CYP will undertake training as appropriate. They also receive copies of the Club's Safeguarding policies and procedures and are expected to read and abide by them as set out in their agreements. Refresher safeguarding training is provided every three years or earlier as required.

## ROLES AND RESPONSIBILITIES

Safeguarding young people is the responsibility of everyone and Milton Keynes Dons F.C. is determined that all people working for and with the Club are well prepared to meet this responsibility.

Any member of staff, paid and volunteers, who has a concern about a child's welfare or welfare of an adult at risk must follow the procedures set out in this policy.

Line managers and supervisors will ensure that safeguarding is understood by their teams through regular discussions. These discussions reinforce culture, check understanding and ensure appropriate and up-to-date training. Staff and volunteers are provided with wallet cards which they carry and which provide key contact details and guidance for safeguarding matters.

All staff and volunteers are subject to DBS Enhanced clearance as part of our safer recruitment process where roles include regulated activity with children and young people or adults at risk. Senior leaders will ensure that training for staff and volunteers is regular and leads to a culture where safeguarding is paramount.

The designated safeguarding officer, and their deputies, will provide support to staff members to carry out their safeguarding duties and who will liaise closely with other services such as children's social care.

Contact details for key staff can be found in at the end of this policy

For the purpose of this policy and procedure the Safeguarding Team consists of:

Senior Safeguarding Manager (SSM), SET Chief Executive Officer -); Club Designated Safeguarding Officer (DSO), Dept Safeguarding Officers (DepSO) and HR Administrator.

### **Senior Safeguarding Manager (SSM)**

Is responsible for all aspects of the MK Dons Football Club and to ensure safeguarding is a key priority at Board Level, and is responsible for providing the club with- wide strategic leadership that assists the Club to deliver the safeguarding strategy, vision, values, priorities, policies, promoting the welfare of vulnerable groups, communicating at Heads of Department level.

### **Designated Safeguarding Officers (DSO)**

Responsible for the strategic and operational direction and, also, embedding safeguarding across the Club. This post is also lead point of contact should safeguarding concerns arise and the Lead Disclosure Officer.

### **Welfare Officer**

Responsible for ensuring all vetting checks including criminal record checks adhere to the Club's Recruitment Policy as well as legislation and governing body rules.

### **HR Administrator**

Responsible for ensuring all vetting checks including criminal record checks adhere to the Club's Recruitment Policy as well as legislation and governing body rules.

### **Departmental Safeguarding Officers (DepSO)**

Responsible for embedding safeguarding within their own departments as well as being the point of contact should a concern arise within their own departments

### **Ongoing awareness**

Directors, employees, workers, agency staff, consultants and volunteers are responsible for familiarising themselves with the SET's policy and procedures, ensuring the safety and welfare of all CYP. All adults who work with CYP are expected and encouraged to promote best practice, create a safe and inclusive environment and to prevent harm occurring by remaining aware of what constitutes abuse and neglect.

## **CULTURE**

A policy is only useful if it is applied consistently well. The Club is committed to developing a culture where all staff and volunteers are vigilant and work proactively to keep children safe. All staff and volunteers will recognise the importance of their own behaviour and will speak out if they are concerned that someone else is behaving in a way which may put others at risk, even when they are certain that there is no intention to do so.

Staff and volunteers will refer all concerns to their line manager or the designated officer quickly and fully.

Staff and volunteers will work in tandem with schools and other partners to keep children safe while working in their setting. As well as discussing concerns with line managers, staff will be empowered to discuss concerns with appropriate leaders in the schools, colleges and other agencies where they are working. The Club has a positive history of participation and collaboration with our local safeguarding board MKSB and actively work with service users to shape and inform our practice and procedures

## **ONLINE WORLD**

Although the online world provides many benefits to CYP, there are also a number of potential associated risks

- Inappropriate language or images;
- Online grooming;
- Cyberbullying; and
- Sexting.

Further information about the online risks is contained in the Club's Safeguarding Social Media Policy and Procedure which can be accessed on the Club's intranet.

## **RADICALISATION AND EXTREMISM**

Radicalisation and extremism of CYP is a form of psychological/emotional abuse. HM Government states that the aim of radicalisation is to attract people to a particular extremist ideology. In many cases it is with a view to inspiring an adult at risk to eventually become involved with harmful or terrorist activities. Radicalisation can take place through direct personal contact, or indirectly through social media. Extremism is defined as vocal or active opposition to fundamental British values including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. MK Dons Football Club aims to prevent radicalisation and extremism through training and educating CYP in activities undertaken with the Club.

## **BULLYING**

Bullying is behaviour by an individual or group, repeated over time, that is intended to hurt another individual or group either physically or emotionally. MK Dons Football Club recognise this as a safeguarding issue and therefore will not tolerate this in any form including staff to young person or peer to peer bullying. Mk Dons Football Club will therefore treat this in the same way it deals with all safeguarding issues through My Concern reporting and will deal with these instances in the same way as reports of abuse.

## **USE OF PHOTOGRAPHY AND FILM**

MK Dons Football Club staff will only take pictures of participants to be used for advertising and promotion. The images/videos are for our use only and are not passed on to third parties. Pictures will not be stored on phones or tablets but uploaded to the MK Dons Football Club photo folder on the shared drive to ensure no inappropriate use. All parents are asked to inform SET in writing if you have any objections.

## **HANDLING DISCLOSURES AND AVOIDING INAPPROPRIATE BEHAVIOURS OR SITUATIONS.**

To ensure Children and Young People have the most positive and safe experience when engaging with the Club, all trustees, employees, workers, consultants, agency staff and volunteers should adhere to the following principles and action (to ensure they role model positive behaviours and so reduce the risk of potential allegations, abuse and neglect occurring):

- Listen carefully to CYP about his/her needs, wishes, ideas and concerns and take them seriously

- Treat all CYP equally not showing favouritism
- 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 activity fun and enjoyable; promote fairness, confront and deal with bullying.
- Maintain a safe and appropriate distance with CYP and avoid unnecessary physical contact.
- Where any form of manual/physical support is required it should be provided openly and with the consent of the Children and Young People.
- If CYP have to be supervised in changing rooms always ensure coaches etc. work in pairs.
- Request written consent if the club are required to transport CYP using the club's Multi-Use Consent Form
- For any significant travel arrangements e.g. overnight stays.
- Staff maintain their qualifications and professional development;
- A qualified first aider is in attendance or readily available;
- Maintain appropriate professional relationships with CYP, including only engaging with CYP online with prior approval and through the Club's social media channels.
- On tours, ensure that adults should not enter a Child or Young Person's room unless there is a safety concern, in which case two adults should enter and should not invite CYP into their rooms.
- Be a good role model, this includes not swearing, smoking, or drinking alcohol in the company of CYP.
- Always give enthusiastic and constructive feedback rather than negative criticism;
- Promote the Club's vision and values and be an ambassador for those values;
- Ensure CYP adhere to his/her relevant Code of Conduct;
- Secure written consent for the SET to administer emergency first aid or other medical treatment if the need arises.
- Reward effort as well as performance;
- Challenge unacceptable or inappropriate behaviour.
- Encourage CYP to take responsibility for their own behaviour and performance.
- Keep a written record of any incident or injury that occurs, along with details of any treatment given or action taken using the Club's Accident and Incident Report Form on the Pyramid system
- Recording safeguarding concerns on the Safeguarding My Concern platform

This list is not exhaustive.

## **HANDLING DISCLOSURES AND AVOIDING INAPPROPRIATE BEHAVIOURS OR SITUATIONS.**

The following are regarded as poor practice and should be avoided by all directors, employees, workers, consultants, agency staff and volunteers:

- Unnecessarily spending excessive amounts of time individually with a Child or Young Person away from others.
- Being alone in changing rooms, toilet facilities or showers used by CYP;
- Taking CYP alone in a car journey unless a club pool vehicle is used, and written consent is sought from the club's Safeguarding Team for emergency situations.
- Taking CYP to your home or in a place where they will be alone with you, Sharing a room with an CYP.

- Engaging in rough, physical or sexually provocative games, including horseplay;
- Allowing or engaging in inappropriate touching of any form;
- Allowing CYP to use inappropriate language unchallenged, making sexually suggestive comments to a child or young person, even in fun, reducing a CYP to tears as a form of control.
- Allowing allegations made by a CYP to go unchallenged, unrecorded or not acted upon.
- Doing things of a personal nature that the CYP can do for themselves.
- Not recording safeguarding concerns on the Safeguarding My Concern platform
- Having CYP engaged with the Club as 'friends' or 'followers' within social networking sites such as Facebook, Twitter and Instagram.
- Sending inappropriate text messages or social media messages to CYP
- Engaging with CYP on 'one to one' personal electronic communication.

This list is not exhaustive.

## **RISK ASSESSMENTS**

For all Club activities including, trips, tours, events and activities, thorough risk assessments must be completed to identify and minimise potential risks. The Club's Health and Safety guidelines outlines the process to undertake when completing risk assessments as well as how to capture information regarding accidents and incidents and how the Club learns from such matters. Where a CYP is involved in a trip, activity or event, a risk assessment must take account of his/ her particular vulnerabilities whilst in the Club's care. The risk assessment should set out what arrangements are in place for his/ her care and supervision and how risks will be minimised. Activity leaders will be required to continually update risk assessments whilst leading such activities.

## **SUPERVISION OF CHILDREN AND YOUNG PEOPLE**

The Club adheres to best practise guidance from the local authority in relation to the supervision of Club employees or workers for CYP. Generally, there should always be a minimum of two Club employees or workers and ratio of one Club employee or worker to every fifteen CYP. Furthermore, it should be noted when planning that particular activities may require more or less Club employees or workers to CYP ratios due to:

- Needs and capacity of the CYP;
- The nature of the activity and environment;
- Risk assessments or intelligence information identifying potential behavioural or other issues;
- Expertise and experience of the staff involved;
- Mixed gender adult at risk activities will require adults of both genders to supervise where possible. Should the ratio not be suitable, the Club's Safeguarding DepSO/ DSO make a decision whether the activity or event takes place

## **WORKING WITH EXTERNAL PARTNERS**

The Club always ensures external partners and organisations we engage with promote the safety and welfare of CYP and this is outlined in contracts and/or service level agreements. External partners and organisations are required to demonstrate competencies in safeguarding and the club assesses this through its own safeguarding audits. Where organisations do not have their own satisfactory safeguarding arrangements, they will be expected to comply with the Club's standards.

## REFERRALS

If the club has safeguarding concerns in relation to an CYP or their Carers, Club will refer these concerns to external agencies as appropriate. External agencies include, but are not limited to children's social care, the police, health agencies, NCS, the Football Association, and the EFL.

## CONFIDENTIALITY

Every effort should be made to ensure that confidentiality of safeguarding cases is maintained for all concerned. Information should be handled and disseminated on a need to know basis only which would not normally include anyone other than the following:

- The Safeguarding Team;
- The person raising the concern.
- The carer of the CYP who is alleged to have been abused, where appropriate.
- Local Authority and Police.
- Dependent on role, the National Governing Body. Trustees, employees, workers, consultants, agency staff and volunteers may have access to confidential information about CYP in order to undertake their responsibilities. In some circumstances, directors, employees, workers, consultants, agency staff or volunteers may be given highly sensitive or private information. Confidential or personal information about a CYP should not be used for their own or others advantage.
- Confidential information about a CYP should never be used casually in conversation or shared with any person other than on a need to know basis. In circumstances where the CYP's identity does not need to be disclosed, the information should be handled anonymously. There are some circumstances in which an director, employee, worker, consultant, agency staff or volunteers may be expected to share information about a CYP, for example when abuse is alleged or suspected. In such cases, directors, employees, workers, consultants, agency staff and volunteers have a duty to pass information on without delay, but only to those with designated safeguarding responsibilities (DSO and Safeguarding Team). If an director's, employee, worker, consultant, agency staff or volunteer is in any doubt about whether to share information or keep it confidential, guidance should be sought from the club's Safeguarding or Legal Team. The storing and processing of personal information about a CYP is governed by the Data Protection Act 2018.

## INFORMATION SHARING

MK Dons Football Club abides by the 7 guiding principles as set out by HM Government on sharing information:

1. The Data Protection Act 1998 and human rights laws are not barriers to justified information sharing but provide a framework to ensure that personal information about an CYP is shared appropriately.
2. Openness and honesty with the CYP (and/or their carer/family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek agreement, unless it is unsafe or inappropriate to do so;
3. Advice is sought from the club's Safeguarding and/ Legal Team if there is any doubt about sharing the information concerned, without disclosing the identity of the CYP where possible.
4. Information is shared with informed consent where appropriate and, where possible, there is respect for the wishes of those who do not consent to share confidential information. Information will still be shared without consent if, in the Club's judgement, there is good reason to do so, such as where safety may be at risk. Judgement will be based on the facts of the case;

5. Safety and well-being of the CYP is always considered.
6. Information is only shared when it is necessary, proportionate, relevant, adequate, accurate, timely and secure to do so;
7. Records of the Club's decision to share information in relation to any reported concerns, with whom and the reasons are always recorded on the Safeguarding My Concern platform. The Club will share information with the relevant statutory agencies, the English Football League, Premier League Community Foundation, League Football education (LFE) and FA where appropriate in relation to safeguarding cases.

## REVIEW

MK Dons Football Club shall review this policy and procedures annually or whenever there is a change in legislation, guidance, governing body rules or learning from safeguarding cases.

## DATA PROTECTION

We will follow the MK Dons MKD FC Data Protection policy with regards to any information received from any individual, however if the information relates to child protection we will ensure this is stored in a secure manner. All information will be stored together in one place and any investigating body will have access to all information stored in order to support the investigation. Only persons involved in the investigation should handle this information. Details relating to safeguarding will not be stored on MK Dons MKD FC's CRM system, but a reference will be made on the CRM to the records/correspondence which will be stored in an area of the K drive and in the case of hard copies in a lockable filing cabinet (Only the Designated officer or their deputies will have the keys for this). The CRM reference will include who within MK Dons MKD FC to contact for details.

## DATA PROTECTION

This policy should be read with MK Dons MKD FC Equality and Diversity Policy and Equal Opportunity Policy. Equality is based on the idea of fairness whilst recognising that everyone is different, and diversity is about the ways in which people differ and about recognising that differences are a natural part of society. MK Dons MKD FC expects that all trustees, staff and volunteers who come into contact with children, young people treat them as individuals and make them feel respected and valued as an essential part of our commitment to safeguarding children, young people .

## PROCEDURES

Whenever in doubt, employees and volunteers should contact the one of the designated safeguarding officers on the numbers below for advice and guidance.

<b>Senior Safeguarding Manager</b>	<b>John Cove</b>	<b>01908 622950</b>
<b>Designated Safeguarding Officer (Academy and Football)</b>	<b>Jon Goodman</b>	<b>01908 622881</b>
<b>Designated Safeguarding Officer (Match and Event Days)</b>	<b>Andy Standen</b>	<b>01908 622899</b>

If a child is in immediate danger or is at risk of harm, a referral should be made to MASH (Multi Agency Safeguarding Hub (MASH) at the Local Authority and/or the police immediately. Anyone can make a referral. Where referrals are not made by the designated safeguarding lead, the designated safeguarding lead should be informed as soon as possible that a referral has been made. The following table gives the telephone numbers staff should ring if they have concerns about a child in immediate danger or is at risk of harm:

If staff members have any concerns about a child or adult at risk (as opposed to a child/adult at risk being in immediate danger) they will need to decide what action to take. Where possible, there should be a conversation with the designated safeguarding lead to agree a course of action, although any staff member can make a referral to the MASH.



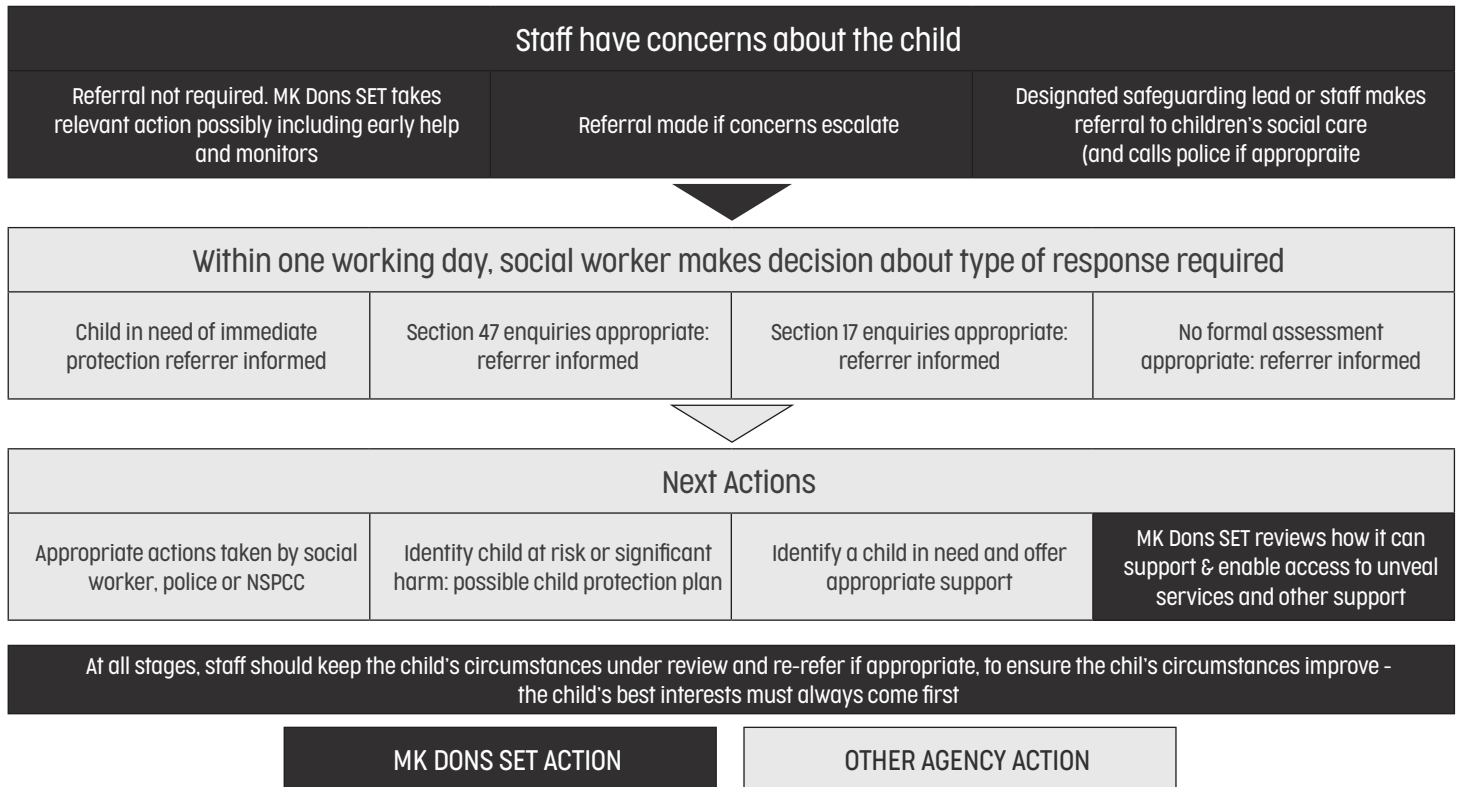
	Milton Keynes
MASH Team	01908 6253169/70 or Out of Hours 01908 265545
LADO	01908 254300
Police	999 for emergency where there is immediate risk of harm to a child or adult at risk 101 for non-emergency calls
Social Care	01908 253772

If anyone other than the designated safeguarding lead makes the referral, they should inform the designated safeguarding lead as soon as possible. The local authority should make a decision within one working day of a referral being made about what course of action they are taking and should let the referrer know the outcome. The designated lead should follow up on a referral should that information not be forthcoming.

If, after a referral, the adult at risk or child's situation does not appear to be improving, the designated safeguarding lead (or the person who made the referral) should press for reconsideration to ensure their concerns have been addressed and, most importantly, that the individual's situation improves. If any member of staff believes that any concerns are not being dealt with appropriately, they should follow the whistleblowing procedure which is detailed in the staff handbook.

**Actions where there are concerns about the conduct of a member of staff:**

Please refer to the document: Dealing with allegations made against an employee/volunteer



## RESPONDING TO DISCLOSURES AND CONCERNS

It is not the responsibility of anyone within the Club to decide whether or not abuse has taken place.

However, there is a responsibility to act on any concerns. The Club assures all directors, employees, casual workers, agency staff, consultants or volunteers that it will fully support and protect anyone, who in good faith reports his or her concern that a colleague or another is, or may be, abusing a CYP.

If an CYP informs you directly that they are concerned about another person's behaviour towards him/her, this is known as a disclosure. In this situation the following steps should be taken:

- Take the CYP to a safe and quiet place;
- React calmly so as not to frighten the CYP;
- Tell the CYP that he or she is not to blame and that he or she was right to tell you;
- Take what the CYP says seriously and do not be judgemental;
- If emergency medical treatment is needed, telephone for an ambulance;
- Avoid leading the CYP in discussion and keep any questions to the absolute minimum. Ask only what is necessary to ensure a clear understanding of what has been said;
- Reassure the CYP but do not make promises of confidentiality or outcome;
- No contact should be made with the alleged abuser, particularly if this is another CYP or the carer of the alleged victim;
- Do not commence an investigation into the incident;
- Refer the concern to the Safeguarding Team immediately;
- Make a record using the SET's Safeguarding My Concern platform

## PRESERVING THE EVIDENCE

Your first concern is the safety and welfare of the CYP. However, your best efforts to preserve evidence are vital especially if any police investigation is required. What you do or do not do in the time whilst you are waiting for the police to arrive may make all the difference. Below are some helpful points:

In situations of physical and/or sexual assault:

- In physical abuse cases, where an CYP wishes to show you an injury, only observe what he/she consents to show you and what is appropriate.
- Do not touch what you do not have to. Wherever possible leave things as they are.
- Do not clean up;
- Do not wash anything or in any way remove fibres, blood etc. If you do have to handle anything at the scene, keep this to a minimum.
- Do not touch any weapons unless they are handed directly to you. If this happens, keep handling to a minimum. Place the items/weapons in a clean dry place to hand to the police.
- Preserve anything that was used to comfort the abused CYP, for example a blanket;
- Secure the room. Do not allow anyone to enter unless strictly necessary to support you or the potentially abused CYP and/or the alleged perpetrator, until the police arrive.

- Prior to the arrival of the police and medical examination:
  - Ensure that no one has physical contact with both the abused CYP and the alleged perpetrator as cross contamination can destroy evidence.
  - Encourage the victim not to shower.
  - Encourage the victim not to change clothing.
- Encourage the CYP not to eat or drink if there is a possibility that evidence may be obtained from the mouth.

## **CONSULTANTS, AGENCY STAFF AND VOLUNTEERS**

Should a concern arise about an trustee, employee, worker, consultant, agency staff or volunteer's conduct in relation to an CYP, this should be reported to the SET's Safeguarding Team who will take such steps as considered necessary to ensure the safety of the CYP in question and any other person who may be at risk. The trustee, employee, worker, consultant, agency staff or volunteer raising the concern should complete the SET's Safeguarding Concern Form via My Concern. When managing an allegation against a trustee, employee, worker, consultant, agency staff or volunteer the Safeguarding Team will follow this process:

- The allegation will be referred to the Milton Keynes Safeguarding Hub Team and/or the Police.
- The carers of the CYP will be contacted as soon as possible, if applicable, following advice from statutory agencies.
- Senior Management will be notified and if applicable the Premier League Community foundation, National Citizen Service
- English Football League Trust and the FA.
- If a member of the Safeguarding Team is the subject of an allegation, the report must be made to the Human Resources
- Director who will refer the allegation to the appropriate statutory agencies.

If required, a full investigation and possible disciplinary action in accordance with the SET's Disciplinary Policy for employees will follow. Trustees, workers, consultants or agency workers may have their Agreements terminated.

- Referrals as appropriate will be made to the Disclosure and Barring Service (DBS)

## **MANAGING CONCERNS FOR AN CHILD OR YOUNG PERSON**

Any concern relating to the bullying or abuse of a CYP by another CYP must be dealt with through this Policy and Procedures. Any such concern should be reported immediately to the DSO who will inform the Safeguarding Team.

## **MAKING A REFERRAL**

All employees, workers, consultants, agency staff and volunteers should complete the SETs Safeguarding Concern Form on My Concern portal after referring any case to the DSO and/or Safeguarding Team. The Safeguarding Team will contact the relevant Local Authority Safeguarding Team completing their Referral Form and update the Safeguarding Concern Form for the SET's records.

## **WHAT TO DO IF AN CHILD OR YOUNG PERSON IS IN DANGER OF IMMEDIATE HARM**

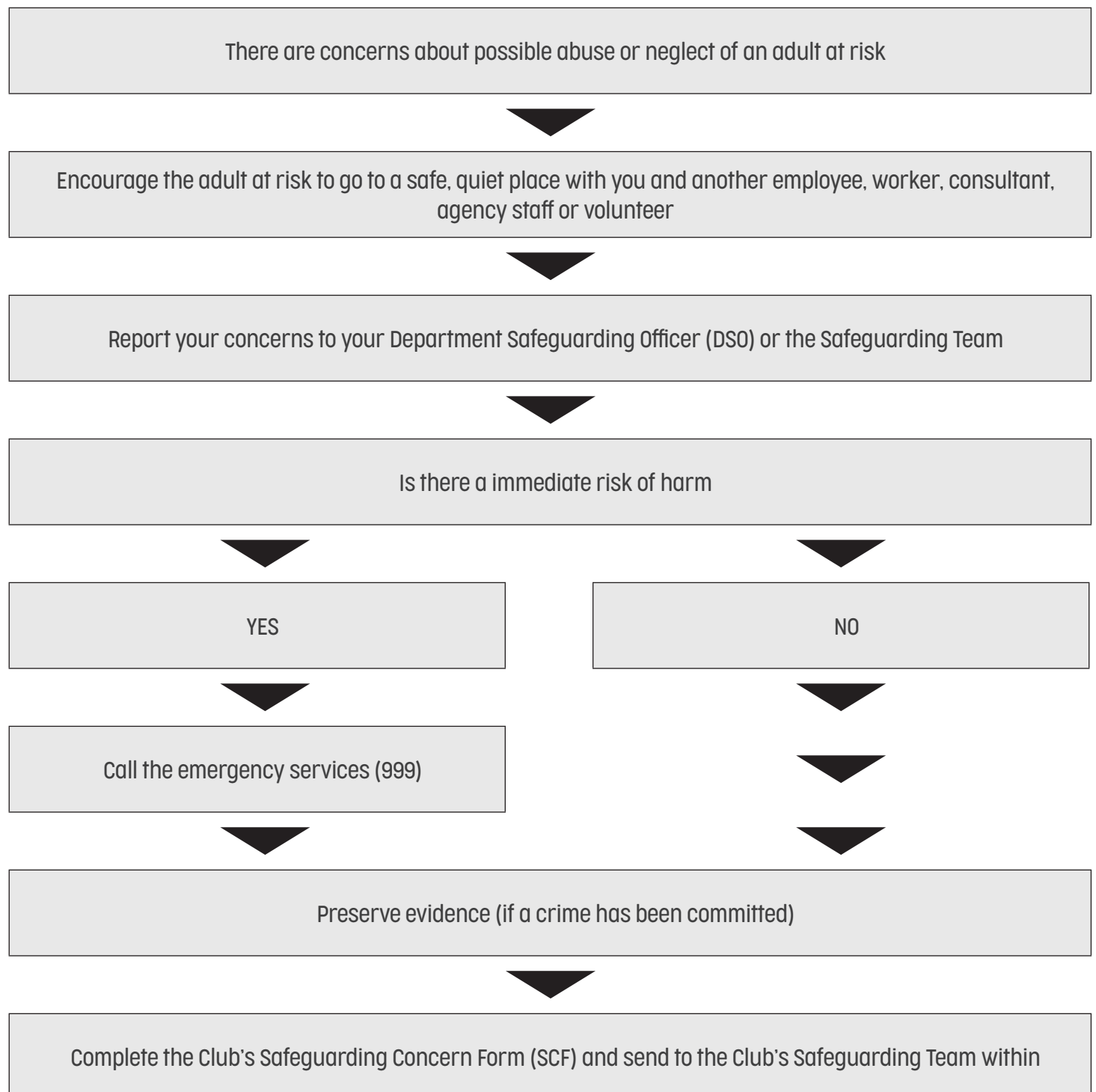
The first priority is to ensure the CYP is in a safe place away from any alleged perpetrator. Emergency services should be summoned whenever a situation is felt to be beyond the control of employees, casual workers, agency staff, consultants

or volunteers. In addition, employees, workers, consultants, agency staff and volunteers should have, readily available, all the contact numbers of the SET's Safeguarding Team, DSOs, colleagues, or other services which can assist in an emergency or urgent situation.

Report the matter to the SET's Safeguarding Team and/or SSM at the earliest opportunity. In the absence of the SET's Safeguarding Team and/or SSM, contact the Milton Keynes Council MASH (Multi Agency Safeguarding Hub) (telephone 01908 253169/70) and/or the police on 101 for help and to ensure the correct procedure is followed.

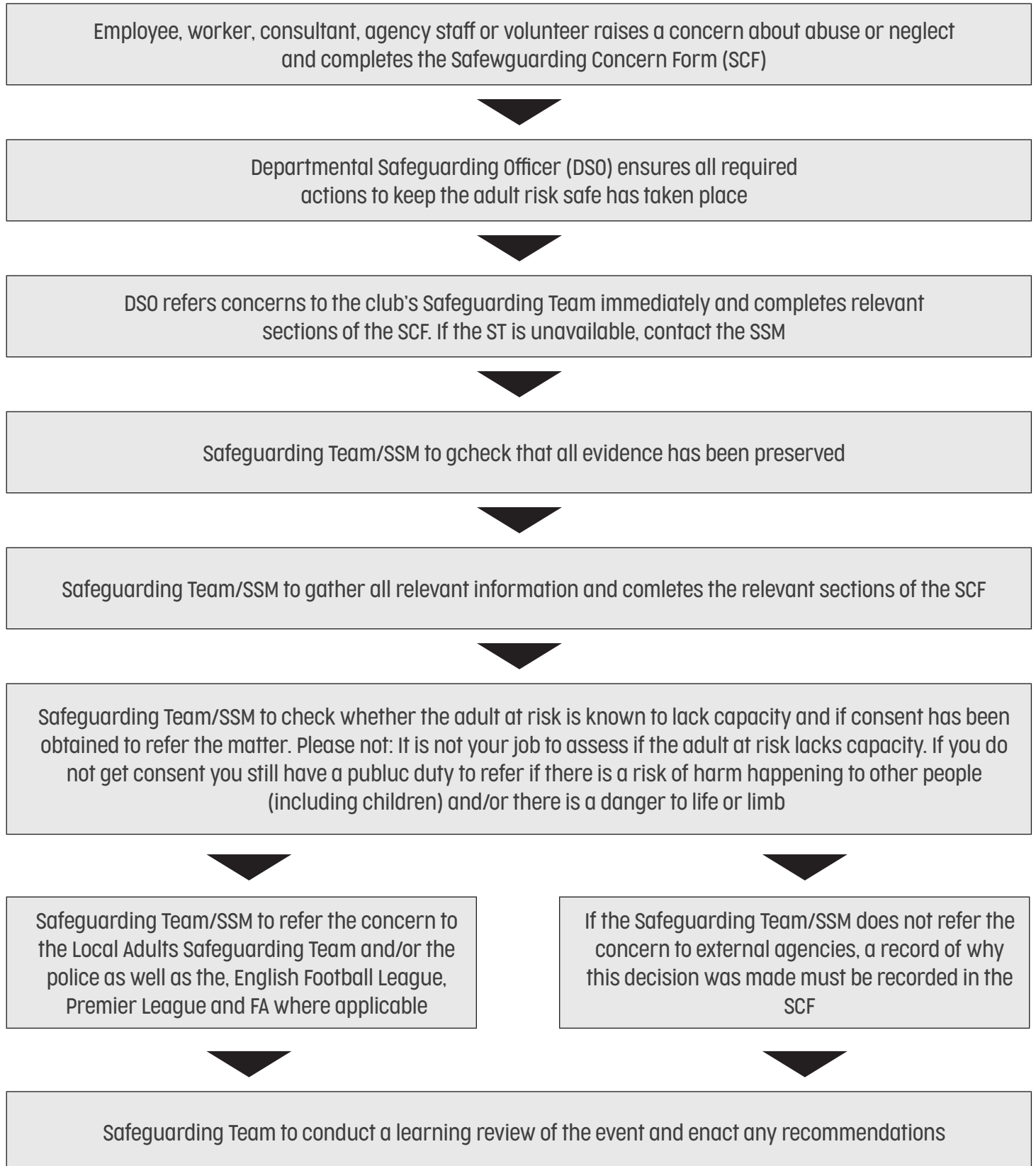
## APPENDIX 1

Flowchart for employees, workers, consultants, agency staff and volunteers who raise a concern about an adult at risk



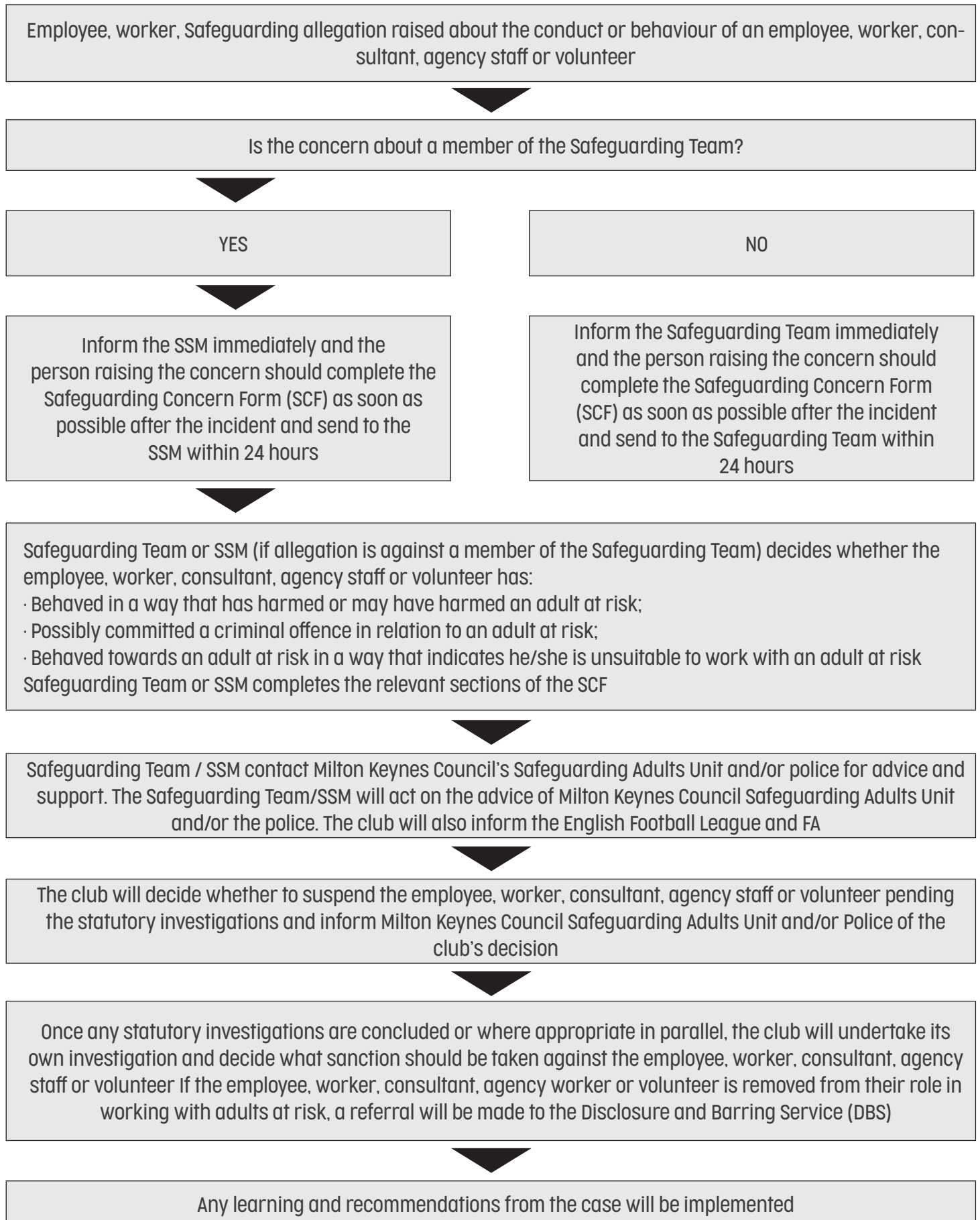
## APPENDIX 2

Flowchart for Departmental Safeguarding Officers (DepSO) and Safeguarding Team (ST) making a referral



## APPENDIX 3

Allegations against employees, workers, consultants, agency staff or volunteers flowchart



## APPENDIX 4

Categories of abuse and neglect as defined by the Care and Support Statutory Guidance (2014)

Neglect and acts of omission	Ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.
Sexual abuse	Rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.
Physical abuse	Assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanction.
Psychological/emotional abuse	Emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.
Discriminatory abuse including hate crime	Forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion.
Financial or material abuse	Theft, fraud, internet scamming, coercion in relation to an adult at risk's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
Organisational abuse	Neglect and poor care practice within an institution or specific care clubting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one-off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.
Domestic violence	Psychological, physical, sexual, financial, emotional abuse; so called 'honour' based violence; female genital mutilation; stalking and forced marriage.
Modern slavery	Slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment
Self-neglect	Neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

## APPENDIX 5

### Club policies and procedures and relevant legislation

Other applicable club Policies and Procedures

- Bullying and Harassment Policy
- Data Handling and Protection Policy · Disciplinary Policy
- Equal Opportunities Policy
- Grievance Policy
- Health and Safety Policy
- Modern Slavery Policy
- Safeguarding Children and Young People Policy and Procedures
- Whistleblowing Policy Key Government Initiatives and Legislation
- Achieving Best Evidence 2002
- Care Act 2014
- Equality Act 2010
- Human Rights Act 1998
- Mental Capacity Act 2005
- Modern Slavery Act 2015
- Protection of Freedoms Act 2012
- Sexual Offences Act 2003
- Safeguarding Vulnerable Groups Act 2006
- Data Protection Act 2018

These lists are not exhaustive



## APPENDIX 6 KEY SAFEGUARDING CONTACTS

ROLE	NAME	CONTACT
Senior Safeguarding Manager	John Cove	01908 622950
Designated Safeguarding Officers	Jackie Bushell	01908 622880
Welfare Officer	Krisztina Nadasdy/Amanda Hall	01908 622911
Welfare Officer	Krisztina Nadasdy	01908 622911
HR Administrator	Krisztina Nadasdy	01908 622911
MK Council	Monday to Friday from 8:30am-5:00pm	01908 253772
	Out of hours 5:00pm-9:00am Monday-Friday Weekends & Bank holidays 24 hrs	01908 725005 <a href="mailto:ascat@milton-keynes.gov.uk">ascat@milton-keynes.gov.uk</a>
Thames Valley Police	Emergencies 999 Non-emergencies 101	If you are unsure contact Thames Valley Police for advice (01865 542210)

## ANNEXE A

### RECOGNITION AND RESPONSE – CHILDREN AND YOUNG PEOPLE

#### Definitions

Child abuse and neglect is a generic encompassing all ill treatment of children including serious physical and sexual assaults as well as cases where the standard of care does not adequately support the child's health or development. Children may be abused or suffer neglect through the infliction of harm or through the failure to act to prevent harm.

Abuse can occur in a family or an institutional or community setting. The perpetrator may or may not be known to the child.

Working together to safeguard children Clubs out definitions and examples of the four broad categories of abuse which are used for the purposes of registration:

- Neglect
- Physical abuse
- Sexual abuse and
- Emotional abuse

These categories overlap and an abused child does frequently suffer more than one type of abuse.

#### PHYSICAL ABUSE

Physical abuse may take forms e.g. hitting, shaking, throwing poisoning, burning or scalding, drowning or suffocating a child. It may also be caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to a child. This unusual and potentially dangerous form of abuse is now described as fabricated or induced illness in a child. Any form of physical chastisement.

#### EMOTIONAL ABUSE

Emotional abuse is the persistent emotional ill treatment of a child such as to cause severe and persistent effects on the child's emotional development and may involve:

- Conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Imposing developmentally inappropriate expectations.
- Causing children to feel frightened or in danger – e.g. witnessing domestic violence
- Exploitation or corruption of children

Some level of emotional abuse is involved in most types of ill treatment of children through emotional abuse may occur alone.

#### 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 and includes penetrative and non penetrative acts.
- non-contact activities, such as involving children in looking at or in the production of pornographic materials, watching sexual activities or encouraging children to behave in sexually inappropriate ways.

- Grooming a child for child sexual exploitation.

## **NEGLECT**

Neglect involves 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 and Development.

This may involve failure to provide adequate food shelter or clothing, failure to protect from physical harm or danger or failure to ensure access to appropriate medical care or treatment. It may also include neglect of a child's basic emotional needs.

## **RISK INDICATORS**

The factors described in this section are frequently found in cases of child abuse. Their presence is not proof that abuse has occurred, but:

- Must be regarded as indicators of the possibility of significant harm
- Justifies the need for careful assessment and discussion with designated/named /lead person, manager (or in the absence of all those individuals, an experienced colleague.
- May require consultation with and /or referral to the Social Services Department

The absence of such indicators does mean that abuse or neglect has not occurred.

In an abusive relationship the child may

- Appear frightened of the parent/s
- Act in a way that is inappropriate to her/his age and development (though full account needs to be taken of different patterns of development and different ethnic groups)

The parent or carer may:

- Persistently avoid child health promotion services and treatment of the child's episodic illness
- Have unrealistic expectations of the child
- Frequently complain about/to the child and may fail to provide attention or praise
- Be absent or misusing substances
- Persistently refuse to allow access on home visits
- Be involved in domestic violence

Staff should be aware of the potential risk to children when individuals, previously known or suspected to have abused children, move in the household.

## **RECOGNISING SIGNS OF PHYSICAL ABUSE**

The following are often regarded as indicators of concern:

- An explanation which is inconsistent with an injury
- Several different explanations provided for an injury
- Unexplained delay in seeking treatment
- The parents/carers are uninterested or undisturbed by an accident or injury

- Parents are absent without good reason when their child is presented for treatment
- Repeated presentation of minor injuries which may represent a cry for help and if ignored could lead to a more serious injury.
- Family use of different doctors and A&E departments
- Reluctance to give information or mention previous injuries.

## **BRUISING**

Children can have accidental bruising, but the following must be considered as non accidental unless there is evidence or an adequate explanation provided:

- Any bruising to a pre-crawling or pre-walking baby
- Bruising in or around the mouth, particularly in small babies which may indicate force feeding
- Two simultaneous bruised eyes without bruising to the forehead, rarely accidental, though a single bruised eye can be accidental or abusive.
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally
- Variation in colour possibly indicating injuries caused at different times
- The outline of an object used e.g. belt marks hand pins or a hair brush
- Bruising or tears around, or behind the earlobe/s indicating injury by pulling or twisting
- Bruising around the face
- Grasp marks on small children
- Bruising on the arms, buttocks and thighs may be an indicator of sexual abuse.

## **BITE MARKS**

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3cm in diameter are more likely to have been caused by an adult or older child. A medical opinion should be sought where there is any doubt over the origin or the bite.

## **BURNS AND SCALDS**

It can be difficult to distinguish between accidental and non accidental burns and scalds and will always require experienced medical opinion. Any burn with a clear outline may be suspicious e.g.

- Circular burns from cigarettes but may be friction burns if along the bony protuberance of the spine.
- Linear burns from hot metal rods or electrical fire elements
- Burns of uniform depth over a large area
- Scalds that have a line indicating immersion or poured liquid a child getting into hot water of its own accord will struggle to get out and cause splash marks
- Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation.

Scalds to the buttocks of a small child particularly in the absence of burns to the feet, are indicating of dipping into a hot liquid or bath.

## FRACTURES

Fractures may cause pain swelling and discoloration over a bone or joint.

Non mobile children rarely sustain fractures

There are grounds for concern if:

- The history provided is vague, nonexistent or inconsistent with the fracture type
- There are associated old fractures.
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement.
- There is an unexplained fracture in the first year of life

## FRACTURES

A large number of scars of different sizes or ages or on different parts of the body may suggest abuse.

Emotional abuse may be difficult to recognize as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also indicate the presence of other kinds of abuse.

The indicators of emotional abuse are often also associated with other forms of abuse.

The following may be indicators of emotional abuse:

- Developmental delay
- Abnormal attachment between a child and parent/carer e.g. anxious indiscriminate or no attachment
- Indiscriminate attachment or failure to attach
- Aggressive behaviour towards others
- Scape goated within the family
- Frozen watchfulness particularly in pre-school children
- Low self -esteem and lack of confidence
- Withdrawn or seen as a loner -difficulty relating to others.

## RECOGNISING SEXUAL ABUSE

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and /or fear. This is particularly difficult for a child to talk about and full account should be taken of the cultural sensitivities of any individual child/family.

Recognition can be difficult unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional/behavioural.

Some behavioural indicators associated with this form of abuse are:

- Inappropriate sexualised conduct
- Sexually explicit behaviour play or conversation inappropriate to the child's age
- Continual and inappropriate or excessive masturbation
- Self- harm including eating disorder self mutilation and suicide attempts.
- Involvement in prostitution or indiscriminate choice of sexual partners

- An anxious unwillingness to remove clothes e.g. sports events but this may be related to cultural norms or physical difficulties.

Some physical indicators associated with this form of abuse are:

- Pain or itching of genital area
- Blood on under clothes
- Pregnancy in a younger girl where the identity of the father is not disclosed
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks abdomen and thighs sexually transmitted disease, presence of semen on vagina anus, external genitalia or clothing.

Evidence of neglect is built up over a period of time and can cover different aspects of parenting.

Indicators include:

- Failure by parents or carers to meet the basic essential needs e.g. adequate food, clothes, warmth, hygiene and medical care.
- A child seen to be listless, apathetic and unresponsive with no apparent medical cause.
- Failure of a child to grow within normal expected pattern, with accompanying weight loss.
- Child thrives away from home environment
- Child frequently absent from school
- Child left with adults who are intoxicated or violent
- Child abandoned or left alone for excessive periods.

Bullying is not always easy to define and can take many forms. The three main types are: Physical, verbal and emotional. For further guidance in this area refer to the MK Dons CLUB bullying guidance in the staff handbook.

## APPENDIX 7 GLOSSARY

CYP	Children and Young People
DBS	Data Barring Service (Criminal Records Check – safeguarding)
SSM	Senior Safeguarding Manager
DSO	Designated Safeguarding Officer
DepSO	Department Safeguarding Officer
MASH	Multi-Agency Safeguarding Hub
LADO	Local Authority Designated Officer