

CLUB SAFEGUARDING POLICY

CREATING SAFE ENVIRONMENTS FOR CHILDREN AND VULNERABLE ADULTS

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Manchester Safeguarding Adults Board, May 2012

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Where safeguarding sits.

The Clubs Core Values:

Pridein our heritage, colleagues and supportersPassionwe will succeed and we want to share itProfessionalismwe never compromise our high standardsPerseverancepositive in adversity and always steadfast

The 'City Promise':

- 1. We will give you a warm and friendly welcome
- 2. We take pride in ourselves and our surroundings
- 3. Your safety is our priority
- 4. We will go the extra mile to help you
- 5. We want you to have a great day at Manchester City

Club Safeguarding Policy Statement

Providing a safe and positive environment for everyone involved is a vital aspect of any club's operations. Manchester City Football Club takes its responsibilities very seriously in this regard, and in particular where children and vulnerable adults are present at any club-led activities.

All participants and visitors to club activity have the right to feel safe and to be safe. Wherever they come into contact with the Club they will be treated equitably and with dignity and respect. All our members of the Club workforce have a duty to keep children and vulnerable adults safe and to help protect them from abuse or harm.

Good safeguarding practice takes many forms. It is a thread, only occasionally visible, that weaves through all activities that involve children and vulnerable adults. It is not a blanket that shrouds everything it covers; it should always be there but should allow the core business to flourish and not be impeded by unnecessary rules and bureaucracy.

Terminology & Definitions – what does it mean?

The Club – refers to Manchester City Football Club Limited, its workforce, and its activities, and applies equally to City In The Community. In certain circumstances it may also refer to third parties with a devolved responsibility for delivering club-supported activity.

Activity - refers to any matches, events, coaching programmes, tours or other related activities where the Club has a responsibility for the welfare of individuals taking part.

Workforce – this refers to any person, employed or deployed, by club managers to work on a paid or voluntary capacity on a Club activity. Such individuals may be full or part-time, permanent or fixed term staff employed directly by the club; they may be deployed by the club on a temporary or casual basis; they may be volunteers deployed by club management; they may be deployed via a third party contractor.

Child – the term 'child' is defined in the Children Act of 1989 as any person under the age of 18.

Vulnerable adult – is a person aged 18 years or over who is, or may be, in need of community care services by reason of mental or other disability, age or illness; and who is or maybe unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation. This may also include someone who is homeless, or is in the criminal justice system, and may be receiving support from local statutory agencies. The term is further defined in law in the Safeguarding Vulnerable Groups Act 2006.

Harm - means ill-treatment or the impairment of health or development, including, for example, impairment suffered from seeing or hearing the ill-treatment of another (Children Act 1989). Harm will often be related to abuse of which there are several recognised forms many relating to both children and vulnerable adults: emotional (including bullying), discriminatory, financial, physical, neglect and sexual. Financial abuse is something more usually related to vulnerable adults but where future professional footballers are concerned this is a significant area of risk.

Parental Responsibility (PR) – Where consent is required in respect of a child taking part in club-related activities, or reporting a concern, we will take all reasonable steps to identify the person(s) with legal PR for that child. Where identifying PR is complex or disputed (not all parents have PR and not all people with PR are parents) we will seek consent from the biological mother or father or adoptive 'parents' unless otherwise instructed.

How Will We Implement The Policy?

Our Club Safeguarding Vision:

A world-leading safeguarding in sport programme.

Our Club Safeguarding Aims:

A safe and welcoming environment for children and vulnerable adults involved in any club activities, free from abuse and fear of abuse in all its forms;

A culture where safeguarding practice is widely understood, openly discussed and where the workforce recognise the role they play in keeping children, vulnerable adults, themselves and their colleagues, safe from harm;

A clear system which promotes and supports: constant vigilance, prevention and early intervention in safeguarding matters, and where necessary, prompt and thorough action in response to any concerns or incidents;

To implement legislation, Government policy and Premier League and FA regulations, policy and guidance where necessary; and

To work closely together with local statutory agencies and other partners to promote and safeguard the welfare of children and vulnerable adults.

In order to realise these aims we will:

- 1. Work with relevant governing bodies and statutory agencies to ensure we meet all necessary regulations in respect of our safeguarding practice. We will adopt the standards presented in the Governments statutory guidance documents 'Working Together to Safeguard Children' and 'No Secrets';
- 2. Listen to children and vulnerable adults, take them seriously, and react swiftly and appropriately to ideas, feelings and concerns and address them in a fair, effective and timely manner;
- 3. Develop and communicate a series of clear policies, protocols and guidance designed to help deliver good practice across the Club;
- 4. Maintain a visible presence across all areas of the club including Club internet platforms;
- 5. Appoint and maintain a full time Head of Safeguarding position;
- 6. Create an effective support network of designated Safeguarding Officers and a Lead Disclosure Officer, across the club;
- 7. Provide an advisory and support mechanism across all areas of the business where children and vulnerable adults are involved in any Club-led activity;
- 8. Support the Club's 'Safer Recruitment' philosophy, through an appropriate criminal records vetting protocol, in accordance with legislative and regulatory requirements and in partnership with the Human Resources department;
- 9. Develop a consistent and appropriate safeguarding training programme for staff, volunteers, partners and participants; and
- 10. Maintain confidentiality of all information and documentation relating to CRB disclosures, concerns, allegations and incidents in accordance with the Data Protection Act.

Who will we work tirelessly to keep safe?

To illustrate the scope of this work the list below provides a number of examples or situations across the Club where we need to consider the welfare of people in our care:

- Players involved in the Academy and associated development programmes;
- U18 players who are part of the senior squad;
- Children and vulnerable adults taking part in City in the Community (CITC) activities;
- Disabled supporters and other vulnerable adults contacting the Club, visiting the stadium on match days, or visiting for other pre-arranged activities (e.g. stadium tours);
- Homeless people, people with mental health issues, or young offenders taking part in Success Through Sport or other community-based programmes;
- Young players on tour or living for significant time away from home in club-arranged accommodation or in Private Fostering situations;
- Children (including very young children) visiting the stadium for matches, events or tours;
- Children or vulnerable adults involved in activities organised by other agencies benefitting from the Club's charitable 'Giving' programme;
- Ball boys & girls, match-day mascots and flag-bearers;
- Support to those who may be vulnerable to bullying or cyber-bullying through their relationship with the Club;
- Participants on MCFC Soccer Schools and School of Football in both the United Kingdom and abroad; and
- Disabled children and disabled adults taking part in any MCFC organised activity.

Age Sensitivity

The Club recognises that the term 'children' covers individuals from birth up to 18 years old and this policy covers this entire age range. As a general principle we will also be sensitive to the developmental maturity of children in our care and ensure that this is taken into account when decisions are made that affect them.

Additional Vulnerability

'Children' are usually fairly easy to identify. Additional vulnerability is not as easy: disability, ethnicity, sexuality. Adults with additional vulnerability are often even more difficult to identify and plan for. It is a priority of this Club to safeguard the welfare of both children and adults with additional vulnerability when in our care.

Language & Communication

Football is a multi-cultural, global sport. Manchester City FC is a global brand. Some people taking part in our activities may not use English as their first language or may experience difficulty communicating with club staff in the usual ways. As a principle we will always be patient and try to communicate in an individual's chosen way and where necessary we will use an interpreter (ie foreign language) or communicator (eg British Sign Language).

Children from Overseas

Occasionally the Club will come into contact with children who do not live in this country. This policy applies equally to them. We will also ensure that where this situation does arise that international law and football regulations are applied as well as the needs of the child being put first. Where we have a concern that a child may be being exploited or 'trafficked' the appropriate authorities will be informed.

Safeguarding & the Club's workforce

Safeguarding is also about ensuring that all staff, volunteers and partners understand the wider role that they play in protecting vulnerable people. This means all members of the workforce involved in training, managing, supervising or caring for children or vulnerable adults, in particular:

Coaches & Managers
 Football scouts
 Host Families
 Managers

Medical staff
 Hospitality & membership
 Partners, licence holders &

Stewards
 Private tutors
 their staff

The workforce must help to keep those in their care safe from harm but must also be aware of the need to understand how to keep themselves and their colleagues safe from having unfounded or malicious allegations by maintaining professional boundaries, and avoiding behaviour that may be misinterpreted by others.

The Club applies the best practice guidance from the Premier League safeguarding unit: "Guidance for Safe Working Practice (for the protection of children and adults at Premier League clubs)". Any breach of this policy or those guidelines will be treated very seriously and may result in disciplinary action.

Positions of Trust

As a result of the roles and authority that many members of the Club workforce hold, they are in Positions of Trust in relation to those in their care. This means that they are in a position of power and influence over children or vulnerable adults who take part in Club activity and as such have the potential to abuse that Position of Trust. Staff must not abuse their position for personal advantage or gratification or that of others.

Standards of Behaviour

The Clubs workforce will adopt the highest standards of behaviour at all times in order that they may maintain the confidence and respect of children, vulnerable adults, parents, customers, supporters and colleagues. Within the scope of their duties their actions should always be reasonable, appropriate, warranted, proportionate, safe and applied equitably.

Information and Communication Technology (ICT)

ICT is used across the Club in many and varied ways. Its use will continue to grow and change with new developments in this arena. It is used to communicate with supporters, customers, players and the media. The Club will:

- develop and maintain clear policies on internet, email and social media usage;
- raise awareness amongst young players regarding safer internet/social media use in respect of their position (and additional vulnerabilities) as future professional footballers;
- have a zero-tolerance approach to 'cyber-bullying'; and
- respond quickly and appropriately to inappropriate use of the internet and social media by players and members of the workforce.



Training

The Club's safeguarding team will receive training across most areas of the safeguarding landscape, such as: good practice, e-safety, disability, neglect, domestic violence, gang culture, substance misuse, exploitation, radicalisation and people trafficking.

In turn the safeguarding team will offer support and training to other staff who may be faced with those issues and concerns through their day-to-day work with children or vulnerable adults.

All new staff joining the workforce will complete a detailed induction to the club and this will include suitable safeguarding training relevant to their role. We will also work with players and parents to raise awareness of safeguarding issues that may affect them.

Consent

The club recognises the need to approach the individual needs of children and vulnerable adults in the appropriate way and according to the law and statutory guidance.

Where a child is at risk of harm, consent to act on concerns is not required, although consent from, and consultation with, those with Parental Responsibility is considered good practice by the Club unless this would put the child at greater risk of harm.

'Consent' - Vulnerable Adults

If a vulnerable adult has the capacity to consent then they should have the opportunity to consent before a decision is made that affects then – eg. passing on a concern to statutory agencies. Club staff will assume that an adult has the capacity to consent unless it is established that they lack this capacity. A seemingly unwise decision should not be mistaken as lacking capacity. We will act where the individual is put in immediate and significant risk of harm.

'Best Interests' - Vulnerable Adults

Any decisions, taken on behalf of someone who is deemed, at the point where a decision must be made, to lack capacity, will be taken in his or her best interests. Where possible we will take into account (known) past or future wishes and religious or moral beliefs.



Reporting concerns.

Alerters

If any member of the Club workforce has a concern about a child or vulnerable adult they have a duty to tell a member of the clubs safeguarding team. At this point they become an 'Alerter'. The safeguarding team member will in turn report any 'alerts' to the Head of Safeguarding (or appointed deputy). If there is immediate risk of harm, a serious injury, or a criminal offence may have been committed, then the police or other emergency services must be involved at the earliest opportunity.

Whistleblowing

Manchester City Football Club views the reporting of concerns by members of the workforce as a vital element of maintaining its Core Values. Individuals are strongly encouraged to report incidents of malpractice where the law, club policy or protocol has been breached by another member, or members, of the workforce. Failure to do so may result in disciplinary or criminal action.

Record Keeping & Confidentiality

The club will keep a record of all incidents and concerns reported to the Safeguarding team. Any such reports will be taken seriously, treated with respectful uncertainty and carefully recorded, acted upon where appropriate, and confidentially stored. Records will be regularly reviewed in order to identify patterns of behaviour that may give rise to concern. All information collected and stored, whether verbal or written, will be treated with the utmost sensitivity and handled in accordance with the Data Protection Act.

Criminal Investigations & Social Care Services

Where serious concerns are raised and/or a criminal offence may have been committed then it is not the responsibility of Club staff to determine if abuse has taken place. This is the responsibility of the police and/or local authority who may involve club staff in any investigation procedures. Where the police decide that they will not take any further action then the local authority may still proceed with an investigation in conjunction with the Club.

Where both the police and social care services have decided to take no further action then the Club management may undertake an internal investigation in accordance with Club disciplinary procedures.

Local Authority Designated Officer (LADO)

The Head of Safeguarding will maintain a working relationship with the relevant LADOs (Local Authority personnel who preside over issues relating to adults who work with children) and where necessary, work in partnership in response to concerns, incidents or allegations.

ISA Referrals

If a member of staff is removed (or resigns) from their role as a result of an allegation or investigation conducted under this policy and the necessary criteria are met, a referral to the Independent Safeguarding Authority will be made in conjunction with the appropriate statutory agencies.



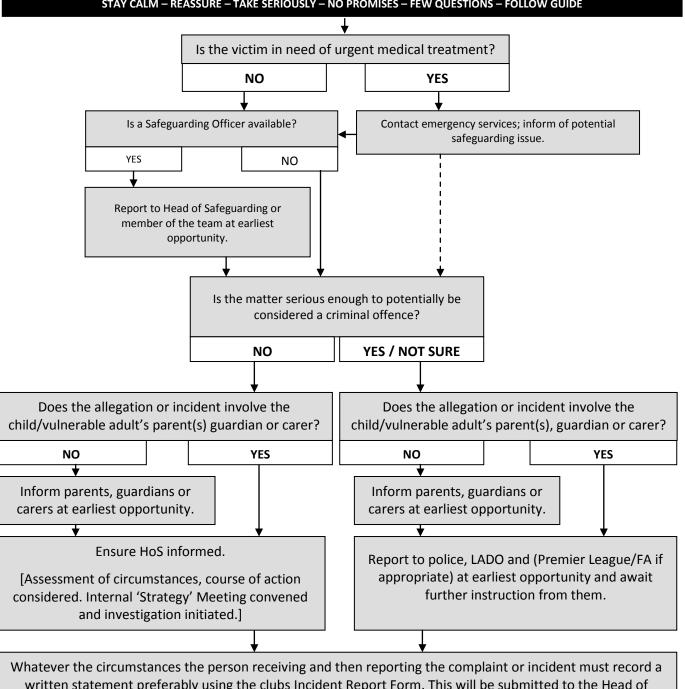
Responding to a Concern, an Incident or an Allegation

The flowchart presented below details the immediate response to an incident or concern involving a child or vulnerable adult.

A child or vulnerable adult* has disclosed concerning information to you OR

*It is essential when considering an incident or concerns involving a vulnerable adult to obtain the consent of the vulnerable adult before referring the matter to a statutory agency, unless there is an immediate risk of harm.

STAY CALM - REASSURE - TAKE SERIOUSLY - NO PROMISES - FEW QUESTIONS - FOLLOW GUIDE



written statement preferably using the clubs Incident Report Form. This will be submitted to the Head of Safeguarding at the earliest opportunity.



Further Policies & Guidance.

This Policy underpins all the work undertaken across the club that involves direct (and in some cases indirect) engagement with children and vulnerable adults. Where there are significant areas or levels of engagement, this policy is supplemented by further policies, protocols, guidance and training. These documents are listed below and are available, where appropriate, upon request. The table details the areas to which the Policy refers to.

Document	Whole Club	Academy	Recruitment	Supporter Services	Stadium & Match Day	Community	Licence Partners
External							
No Secrets (Vulnerable Adults)	~						
Working Together to Safeguard Children	~						
Premier League Regulations	>						
Guidance for Safe Working Practice (Premier League)	>						
Internal							
Club Safeguarding Policy	>						
Heath & Safety Policy	>						
@City&Safe	>						
CRB Policy & Protocol (inc Rehab of Ex-Offenders)	>						
The City Way – Keeping Children Safe							~
Safeguarding 1 st Contact	>						
Do's & Don'ts	~						
Anti-Bullying Policy	~						
Email & Internet Policy	>						
Social Network & Blog Policy	>						
Guidance for Under 5s (Sept 12)				>	~		
Dealing with Safeguarding – Guidance for Managers	>						
Ball Boys & Girls – The City Way		>			>	>	
Procedures for Hotel Accommodation		>					
Duty Staff Guide – Hotel Accommodation		~					
Player Guide – Hotel Accommodation		~					
Accommodation at MCC – Host Family Recruitment Guide		~					
Safely Scouted			~			~	
Safely Fostered		~	~				
Safeguarding Compliance – Guidance for Managers						~	
Safeguarding Compliance – Guidance for Applicants						~	
Equity Policy (Sept 2012)	>						
Photography Policy (Sept 2012)	~						
Non-Accidental Injuries Guidance & Referral		>				~	



Useful Contacts.

MCFC Head of Safeguarding

Nic Scott

Office: +44 (0) 161 438 7804, Mobile: 07887 80 44 66 Email: Nic.Scott@mcfc.co.uk

Contacts for the Club safeguarding team http://www.mcfc.co.uk/The-Club/Safeguarding/If-You-Have-A-Concern

Premier League Head of Safeguarding

Jessica Addicott

Office: +44 (0) 20 7864 9000 Email: safeguarding@premierleague.com

Local Police

In an emergency, where there is a threat to life, serious injury, or a crime in progress call: 999 For non-emergency calls or to report a crime call: 101

Local Authority Safeguarding

All Greater Manchester Local Authority Safeguarding contacts can be found on the GMP partnership website http://www.gmsafeguardingchildren.co.uk via the Contacts page.

Manchester Adult and Children's social care contact service

Pink Bank Lane, Pink Bank Lane, Longsight, Manchester, M12 5QN

Main Switchboard: 0161 234 5001 Direct: 0161 255 8250 Email: mcsreply@manchester.gov.uk

Local Authority Designated Officers (LADOs)

Where you have a complaint about an adult who works with children.

Manchester: Majella O'Hagan majella.o'hagan@manchester.gov.uk Tel: 0161 203 2305

<u>Tameside:</u> Mike Dudley <u>mike.dudley@tameside.gov.uk</u> Tel: 0161 3424343 Trafford: Anita Hopkins <u>anita.hopkins@trafford.gov.uk</u> Tel: 0161 912 5024

NSPCC

Help for children & young people - ChildLine: 0800 1111

Help for adults concerned about a child: 0808 800 5000