

**TOTTENHAM HOTSPUR**

**SAFEGUARDING**

**SAFEGUARDING  
AND  
CHILD PROTECTION  
POLICY**

**NEXT REVIEW: November 2020**



Owner : Dayne Matthieu, Head of Safeguarding & Welfare

Approved and endorsed by : Matthew Collecott, Director, on behalf of the Directors of  
Tottenham Hotspur Football and Athletic Co. Ltd  
("Tottenham Hotspur")

**Copyright:**

Permission has been given from agencies to use extracts from their publications, which under any other circumstances are protected by copyright. This document is under copyright and reproduction is prohibited without prior written permission from the Head of Safeguarding & Welfare at Tottenham Hotspur.

Parts of this document have been adapted from the Department for Education's guidance "Keeping children safe in education: information for all school and college staff." It contains public sector information licensed under the Open Government Licence. It is available to download at: [www.gov.uk/government/publications](http://www.gov.uk/government/publications).

# SAFEGUARDING AND CHILD PROTECTION POLICY

## TABLE OF CONTENTS

	<b>Foreword</b>	
	<b>Sporting Activities</b>	
<b>1.</b>	<b>POLICY STATEMENT AND PRINCIPLES</b>	<b>5.</b> <b>CHILDREN'S ACTIVITIES (Cont'd)</b>
	Sporting Activities for Children	- Children of compulsory school age employed as staff
1.1	Safeguarding statement	- Young people as sports coaches
1.2	Policy principles	- Child Performance Licence
1.3	Policy aims	- Ball Boys/Girls
		- Tottenham Hotspur Medical
<b>2.</b>	<b>SAFEGUARDING LEGISLATION AND GUIDANCE</b>	- Tottenham Hotspur Foundation
	Related Tottenham Hotspur policies	- Tottenham Hotspur Academy
	Definitions	- Tottenham Hotspur Ladies
<b>3.</b>	<b>ROLES AND RESPONSIBILITIES</b>	
3.1	Tottenham Hotspur	
3.2	The Head of Safeguarding & Welfare	
3.3	The Deputy for the Head of Safeguarding & Welfare	
3.4	The Safeguarding Officer	
3.5	The Head of Department and Senior staff	
3.6	Staff	
<b>4.</b>	<b>GOOD PRACTICE GUIDELINES</b>	<b>6.</b> <b>CHILD PROTECTION</b>
4.1	Staff/Child relationships	Recognising abuse
	- Abuse of position of trust	6.1 Child Abuse and Neglect
4.2	Helping children to keep themselves safe	6.2 Types of Abuse and Neglect
4.3	Support for those involved in a child protection issue	6.3 Identifying Vulnerable Children
4.4	Complaints procedure	6.4 Specific Safeguarding Issues
4.5	Concerns about poor practice	- Minority Ethnic Children
4.6	Concerns about a colleague	- Risky Behaviour
4.7	Allegations against staff	
4.8	Staff training	<b>6.5 Issues</b>
	- New Staff	- Child Sexual Exploitation
	- Safeguarding Lead and Deputy	- FGM
	- Supply Staff and other visiting staff	- Radicalisation
4.9	Safer recruitment	- County Lines
	- Regulated Activity	- Children with sexually harmful behaviour
	- Disqualification by Association	- Domestic abuse
	- Staff Safeguarding Register	- Teenage relationship abuse
	- Volunteers	- Faith abuse
	- Volunteers who are supervised	- Forced marriage
4.10	Third Party organisations	- Honour based violence
4.11	Contractors	- Trafficking and Modern Slavery
4.12	Site Security	- Private fostering arrangements
4.13	Extended school and off-site arrangements	
4.14	Photography and images	<b>6.6 Reporting</b>
	- Match Day photography	- If you are concerned about a child's welfare
4.15	E-Safety and social media	- Taking action
	- E-Safety for staff	- If a child discloses to you
		- How to respond
<b>5.</b>	<b>CHILDREN'S ACTIVITIES</b>	- Reporting procedure for activities in schools/other organisations
5.1	Good Practice	- Notifying parents
5.1.1	Inclusive Good Practice	- Referral to children's social care
5.2	Special Arrangements	- Reporting directly to child protection agencies
	- Children and young people on work experience	
	- Children and young people employed as staff	<b>6.7 Confidentiality, Information Sharing and Storage</b>
		<b>6.8 Chart: Reporting Procedures</b>
		<b>6.9 Reporting Procedure for Safeguarding Lead</b>
		<b>APPENDICES</b>
		1. Further information on key issues
		2. Glossary
		3. Contacts
		4. Equality Impact Assessment



## FOREWORD

The Safeguarding and Child Protection Policy reflects the safeguarding ethos of the Club. The Board of Directors endorses this document as part of the Club's constitution and we expect all staff in the workforce community at Tottenham Hotspur to share our commitment to safeguarding and promoting the welfare of children and young people (under 18s).

The Club's Safeguarding Children Policy and Safeguarding Adults Policy are linked to ensure the safety and protection of vulnerable groups.

### **Matthew Collecott**

Operations and Finance Director  
on behalf of the Board of Directors  
of Tottenham Hotspur Football & Athletic Co. Ltd.

## Sporting Activities for Children

Child abuse is any form of physical, emotional or sexual mistreatment, or neglect by act or omission that leads to injury or harm to the child. Harm could be unintentional – it is not always deliberate. Injury resulting from abuse differs from that which occurs in the context of sport because most sports injuries are accidental or the result of momentary lack of care.

Child abuse encompasses a range of deliberate conduct or failure of a person charged with the care of a child to act in the proper interests of the welfare of that child.

Tottenham Hotspur takes all reasonable steps to ensure that children engaged in its activities do so in a safe environment and are safeguarded from abuse. Personnel are trained to take heed of children and deal with appropriate agencies where children appear to be at risk in their lives outside the Club.

## 1. POLICY STATEMENT AND PRINCIPLES

This policy is available on the Club website for external stakeholders and on the Club intranet for staff. Our core safeguarding principles reflect the organisational and individual responsibility for safeguarding and promoting the welfare and wellbeing of children and are as follows:

- The Club's responsibility to safeguard and promote the welfare of all children and young people is of paramount importance.
- Safeguarding is everyone's responsibility.
- Children should feel safe in our activities.
- Policies will be reviewed regularly: at least once a year unless an incident or new legislation or guidance suggests the need for an interim review.

### 1.1 Safeguarding statement

Tottenham Hotspur (the Club) recognises its moral and legal responsibility to safeguard and promote the welfare of all children.

The Club will endeavour to provide a safe and welcoming environment where children are respected and valued.

Club staff are alert to the signs of abuse and neglect and follow reporting procedures to ensure that children receive effective protection.

The procedures contained in this policy apply to all staff and are consistent with those of Haringey Safeguarding Children Board.

### 1.2 Policy principles

- The welfare of the child is paramount
- All children, regardless of gender, race, age, ethnicity, ability, sexual orientation, and religious or political beliefs, have equal right to protection from abuse, exploitation and poor practice..
- All children have the right to participate, enjoy and develop through sport, in a safe and inclusive environment, free from all forms of abuse, violence, neglect and exploitation.
- All staff have a responsibility to act on any suspicion or disclosure that a child is at risk of harm

### 1.3 Policy aims

- To provide all staff with information to enable them to meet their child protection responsibilities
- To ensure good practice and create a culture of vigilance.
- To demonstrate the Club's commitment to child protection to children, parents and other partners.



## 2. SAFEGUARDING LEGISLATION AND GUIDANCE

Safeguarding at Tottenham Hotspur is influenced by a range of legislation and guidance:

- The Child Act 1989
- Every Child Matters (policy) 2003
- Safeguarding Vulnerable Groups Act 2006
- Working Together to Safeguard Children (guidance) July 2018
- Keeping Children Safe in Education (guidance) Sept 2019
- Information Sharing (advice for safeguarding practitioners) July 2018
- Human Rights Act 1998
- The Standards for Safeguarding and Protecting Children in Sport – NSPCC CPSU 2016
- The Affiliated Football Safeguarding Policy

The rights of children and young people (under 18s):

- Children have the right to participate in sport and voluntary activities in a safe and enjoyable environment. Their rights are enshrined in the United Nations Convention on The Rights of the Child (1989).

In the UK, more than 50,000 children are annually subject to a child protection plan. Research suggests that one child a week dies from abuse and one child in six is exposed to violence in the home. The prevalence of neglect continues to be a major concern and online abuse is increasing. The sexual exploitation of children is a growing problem and disabled children are three times more likely to be abused and neglected.

Due to their contact with children, staff at Tottenham Hotspur are well placed to observe changes in a child's behaviour and outward signs of abuse and/or neglect.

Children may also turn to a trusted adult at the Club when they are in distress or at risk. It is vital that all staff are alert to the signs of abuse - as well as identifying additional vulnerability or 'need' in some young people who may need support of services - and understand the procedures for reporting their concerns so that the Club can take appropriate action.

### 2.1 Related Tottenham Hotspur policies

This policy is one of a series in the Club's safeguarding portfolio.

- |   |   |
|---|---|
| <ul style="list-style-type: none"> <li>• Safeguarding Strategy</li> <li>• Safe Working Practice (including physical contact, E-safety: hand held devices/staff-child online communication, missing person)</li> <li>• Safer Recruitment (recruitment and selection of staff working with children)</li> <li>• Managing Allegations against Staff</li> <li>• Managing Allegations against other Children</li> <li>• Mental Health and Wellbeing for Children</li> <li>• Safeguarding Adults Policy</li> <li>• Under 18s with First/Senior Team</li> <li>• Academy Transport Policy</li> <li>• Academy welfare/player care philosophy</li> <li>• Academy Education &amp; Looked After Children</li> </ul> | <ul style="list-style-type: none"> <li>• Anti-Bullying Policy</li> <li>• Prevent Policy</li> <li>• Whistleblowing Policy (the Shelf)</li> <li>• Grievance and Disciplinary Policy (the Shelf)</li> <li>• Child and Young Workers</li> <li>• Prevent (radicalisation and extremism)</li> <li>• Health &amp; Safety</li> <li>• Match Days: Creche guidance and policy</li> <li>• Match Days: Mascot Policy</li> <li>• Match Days: Chirpy's Parade &amp; Flag Bearers</li> <li>• Match Days: Missing and lost children, searching and ejecting children, unaccompanied minors</li> </ul> |
|---|---|

#### Other policies and guidance in this document:

- |   |   |
|---|---|
| <ul style="list-style-type: none"> <li>• Code of Ethics and Conduct (for those working with U18s or adults)</li> <li>• E-Safety and Social Media</li> <li>• Inclusive Practice</li> <li>• (equality &amp; promoting diversity)</li> </ul> | <ul style="list-style-type: none"> <li>- Academy Host Families</li> <li>- Academy Youth Loans, Trials &amp; Work Experience</li> <li>- Match Days: Ball Boys/Girls</li> </ul> |
|---|---|



## DEFINITIONS:

**Club:** Tottenham Hotspur Football and Athletic Co. Ltd and includes other terms: Tottenham Hotspur, Spurs, THFC and includes the charitable arm of the Club, Tottenham Hotspur Foundation, which has adopted the policies and procedures of the Club.

**Other terms:** (Source: the International Standards for Safeguarding in Sport.

- **Child** includes everyone under the age of 18.
- **Safeguarding** refers to the actions we take to ensure **all** children are safe from harm when involved in our clubs and activities.
- **Child Protection** is a set of activities that are required for **specific** children who are at risk/or are suffering from significant harm.
- **Abuse** refers to the acts of commission or omission that lead to a child experiencing harm.
- **Harm** refers to the negative impact or consequences upon the child of those actions.
- **Violence** refers to “all forms of physical or mental violence, injury and abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse.” Article 19 UN Convention on the Rights of the Child.

Also see 'Glossary' in Appendix 2.



### 3. ROLES AND RESPONSIBILITIES

#### 3.1 Tottenham Hotspur

Tottenham Hotspur believes that children and young people have the right to take part in sport in an environment which is safe and free from any risk of abuse.

We take all reasonably practicable steps to reduce the risk of harm to children involved in Club activities and discharge our moral and legal responsibility to protect them,

#### 3.2 The Head of Safeguarding & Welfare

The Head of Safeguarding & Welfare has overall responsibility for safeguarding provision across the Club which will include the development and nurturing of safeguarding and welfare arrangements across the club.

The Head of Safeguarding & Welfare champions safeguarding at all areas of club activity and works collaboratively with all stakeholders to ensure safeguarding practice is good throughout the organisation.

#### 3.3 The Safeguarding Manager (Tottenham Hotspur Foundation)

The Safeguarding Manager at the Foundation has shared responsibility for the management of safeguarding officers and provides case management support to those with designated safeguarding responsibilities.

The Safeguarding Manager acts as a Deputy to the Head of Safeguarding & Welfare and is appropriately trained to carry out those functions necessary to ensure the ongoing safety and protection of children

#### 3.4 The Safeguarding Officer

The Safeguarding Officer supports the Club's safeguarding policy, procedures and systems, and acts as a first point of contact for safeguarding matters for a specific department within the Club and will act on concerns as guided by/in collaboration with the Head of Safeguarding & welfare .

#### 3.5 The Head of Department and Senior Staff

Special responsibilities for safeguarding policy, procedures and systems are given to management and those involved in the recruitment, selection and training of staff. Heads of Department and their managers are responsible for ensuring they comply with safeguarding, safer recruitment and safe working practices in their day-to-day operation within their departments and projects.

#### 3.6 Staff

The Club's Code of Ethics and Conduct states that '**Tottenham Hotspur is committed to safeguarding children and adults at risk**' and the Club expects all staff and volunteers (also referred to as "personnel") at every level to share this commitment as part of their duties.

- All staff have a responsibility to provide a **safe environment for children**.
- All staff have a responsibility to identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm. All staff then have a responsibility to take appropriate action and **report concerns**.
- All staff should respect and abide the Club's Code of Ethics and Conduct.
- All staff members should **work with the designated safeguarding lead**, the Head of Safeguarding, to deal with concerns.

For a list of designated safeguarding personnel at Tottenham Hotspur (the Head of Safeguarding & Welfare and Safeguarding Officers) and external contacts, see 'Contacts' in Appendix 3.



## 4. GOOD PRACTICE AND STAFF CONDUCT

To meet and maintain our responsibilities towards children we need to agree standards of good practice which form a code of conduct for all staff.

Good practice and staff conduct includes:

- treating all children with respect.
- setting a good example by conducting ourselves appropriately.
- involving children in decisions that affect them.
- encouraging positive, respectful and safe behaviour among children.
- being a good listener.
- being alert to changes in a child's behaviour and to signs of abuse, neglect and exploitation.
- recognising that challenging behaviour may be an indicator of abuse.
- reading and understanding the Club's child protection policy, safe working practice and guidance documents on wider safeguarding issues, for example bullying, physical contact, sexual exploitation, radicalisation and extremism, e-safety and information-sharing.
- asking a child's permission before initiating physical contact, such as physical support during a sporting activity or administering first aid.
- maintaining appropriate standards of conversation and interaction with and between children and avoiding the use of sexualised or derogatory language.
- being aware that the personal and family circumstances and lifestyles of some children lead to an increased risk of abuse.
- working in an open environment and within sight or hearing of others.
- reporting concerns about a child's safety and welfare.
- following the Club's policy with regard to relationships with children and communication with children, including on social media.

### 4.1 Staff/Child Relationships

The Club provides advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with children. Staff found to be in breach of these rules or the Code of Ethics and Conduct may be subject to disciplinary action or child protection investigation.

- Staff should ensure they maintain healthy, positive and professional relationships with all children (under 18s) and adults at risk.
- Staff working with children and their managers are in a position of trust in relation to young people aged 16 and 17 years.
- Club personnel must not engage in sexual relationships with them while that unequal power relationship exists.
- Even after the young person has reached the age of majority (18) the Club disapproves of relationships between personnel and young people for whom they have previously been responsible.

#### **Abuse of position of trust**

All staff are aware that inappropriate behaviour towards children is unacceptable and likely to be unlawful. At all times, their conduct towards children must be professional.

In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of staff in a position of authority and trust and a child under 18 on a Club activity may be a criminal offence, even if that child is over the age of consent.

The Club's Code of Ethics and Conduct sets out this expectation.

### 4.2 Helping children to keep themselves safe

Children will be expected to comply with a code of conduct and this expectation will be made clear at the start of the activity by a member of staff.

Children will be encouraged to conduct themselves and behave in a responsible manner.

The Club participates in safety campaigns such as Anti-Bullying Week and Safer Internet Day and will promote an ethos of respect for children, and children may speak to a member of staff of their choosing about any worries they may have.



### 4.3 Support for those involved in a child protection issue

Child abuse is devastating for the child and can also result in distress and anxiety for staff who become involved.

We will support children, their families, and staff by:

- taking all suspicions and disclosures seriously.
- nominating a link person who will keep all parties informed and be the central point of contact.
- Where a member of staff is the subject of an allegation made by a child, separate link people will be nominated to avoid any conflict of interest.
- responding sympathetically to any request from children or staff for time out to deal with distress or anxiety.
- maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies.
- storing records securely.
- offering details of helplines or other avenues of external support
- following the procedures laid down in our child protection, whistleblowing, complaints and disciplinary procedures.
- co-operating with relevant statutory agencies.

### 4.4 Complaints procedure

Our complaints procedure will be followed where a child or parent raises a concern about poor practice towards a child that initially does not reach the threshold for child protection action.

Poor practice examples include unfairly singling out a child or attempting to humiliate them, bullying or belittling a child or discriminating against them in some way.

- Formal complaints are managed by senior staff.
- Complaint and feedback mechanisms should be promoted on all children's activities.
- Complaints from staff are dealt with under the Club's complaints and disciplinary and grievance procedures.
- Complaints which escalate into a child protection concern will be managed under the Club's child protection procedures.

### 4.5 Concerns about poor practice

Poor practice represents unsafe working practice and is a cause for concern and staff should feel able to raise concerns about poor or unsafe practice.

In the first instance, staff should discuss with their line manager. If there are reservations about sharing concerns with the line manager, then any of the following can be contacted directly:

Safeguarding Manager at the Foundation, Head of Safeguarding & Welfare, Head of Department, Head of HR or the NSPCC Helpline.

If a member of staff believes that this route has been ineffective, **whistleblowing** procedures are in place for such concerns to be raised (found in the Staff Handbook)

### 4.6 Concerns about a colleague

If staff members have concerns about another staff member then this should be discussed with their line manager, and the Head of Safeguarding & Welfare.

- If the Head of Safeguarding & Welfare is implicated, this would be investigated by either an outside body supervised by HR or the Director of Finance and Operations.
- In a school/college, concerns about school staff should be reported to the Headteacher only.

See chart for 'Reporting Procedures'. These guidelines do not prevent anyone from reporting concerns to external agencies such as the Local Authority or the police.

### 4.7 Allegations against staff

Any allegations against staff must be reported immediately to the Head of Safeguarding & Welfare who will refer to the Local Authority Designated Officer in Haringey.

When an allegation is made against a member of staff, set procedures must be followed. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen.

A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we must accept that some professionals do pose a serious risk to children and we must act on every allegation.



Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is an entirely neutral act and may assist the unfettered investigation of concerns. However, it is not the default option and alternatives to suspension will be considered. In some cases, staff may be suspended where this is deemed to be the best way to ensure that both the staff member and children are protected. In the event of suspension, the Club will provide support and a named contact for the member of staff

The procedures for dealing with allegations against staff can be found in the Club's Managing Allegations Policy.

Staff are reminded that publication of material that may lead to the identification of a member of staff who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing, including content placed on social media sites.

### **Historical Allegations**

Allegations concerning staff who no longer work at the Club, or historical allegations will be reported to the Local Authority Designated Officer and the police even if the alleged perpetrator of the abuse is believed to be deceased.

## **4.8 Staff training**

It is important that staff receive training and awareness to enable them to recognise the possible signs of abuse, neglect and exploitation and to know what to do if they have a concern.

New staff will receive a briefing during their induction by their line manager, which includes familiarisation with the Club's safeguarding policy and Code of Ethics and Conduct, safe working practices, reporting and recording arrangements, and details for their Safeguarding Officer(s) and the Head of Safeguarding & Welfare. Note: Appendix 7 (Signs of Abuse and Neglect) and Appendix 9 (Code of Ethics and Conduct) must be covered, and any specific policies or exemptions must be explained.

Staff should be aware of systems within the Club which support safeguarding. This includes:

- the Club's **Safeguarding and Child Protection Policy**;
- **Safe Working Practice**;
- the Club's **Code of Ethics and Conduct** and
- the designated **safeguarding lead** (the Head of Safeguarding & Welfare) and the team of Safeguarding Officers.

All staff members should also receive appropriate child protection information which is regularly updated. The minimum being:

- For staff working with children in Regulated Activity:
  - The FA Safeguarding Children Workshop (or equivalent) every three years
- For other staff working with children in a position of authority and trust:
  - appropriate safeguarding information and/or training;
- For all other staff:
  - Safeguarding awareness through safeguarding emails and other communications.

Staff are responsible for maintaining their certificates and ensuring that their safeguarding training, first aid and criminal records checks are updated every three years.

### **New Staff**

All new members of staff will undergo an induction that includes familiarisation with the Club's safeguarding and child protection policy, Code of Ethics and Conduct (Appendix 9) and safe working practices on their activities, as well as identification of their child protection training needs.

### **Safeguarding Lead and Deputy**

As Safeguarding Lead, the Head of Safeguarding & Welfare and the Deputy undertake Haringey SCB safeguarding lead training every two years.

### **Supply staff and other visiting staff working with children**

Workers in this group will be given a "Safeguarding for Visitors" booklet. All staff will be made aware of the increased vulnerability and risk of abuse of certain groups, including disabled and SEN children, looked-after children and young carers

Visitors with a professional role, such as social worker or members of the Police will have been vetted by their own organisation. Any professionals visiting the Club should provide evidence of their professional role and employment details (an identity badge for example). If felt necessary, the Club can also contact the relevant organisation to verify the visitor's identity.



## 4.9 Safer recruitment

The Club endeavours to employ safe staff by following safer recruitment protocols.

Safer recruitment means that applicants will:

- complete an application form which includes their employment history and explains any gaps in that history.
- be interviewed, if shortlisted.
- provide two referees, including at least one who can comment on the applicant's suitability to work with children and, ideally, one as the most recent employer.
- provide evidence of identity and qualifications.
- if offered employment, be checked in accordance with the Disclosure and Barring Service (DBS) regulations as appropriate to their role. This will include an enhanced DBS check and a barred list check for those engaged in Regulated Activity.
- if offered employment, provide evidence of their right to work in the UK

At least one member of the recruitment panel should have attended safer recruitment training or consulted with someone who has.

### Regulated Activity

Staff working regularly with children will be considered to be in regulated activity. Schools are 'specified places' which means that the staff and volunteers will be engaged in regulated activity. A fuller explanation of regulated activity can be found in the Guidance "Keeping Children Safe in Education" Part Three and the Club's safer recruitment policy.

### Staff Safeguarding Register

The Head of Safeguarding & Welfare maintains a register of staff working with children.

### Volunteers

Volunteers will undergo checks commensurate with their work at the Club and contact with children. Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised or be allowed to engage in regulated activity.

**Volunteers who are supervised:** Volunteers who work only in a supervised capacity and are not in regulated activity will undergo the safe recruitment checks appropriate to their role, including a DBS check at Enhanced level but without a barred list check.

## 4.10 Third Party Organisations

The Club obtains written confirmation from supply agencies or third party organisations that agency staff or other individuals who may work at the Club with children have been appropriately screened. Arrangements should be that such staff work in an open environment with Club staff overseeing.

## 4.11 Contractors

Contractors will be given a site induction from their Club contact, including an expected code of behaviour/expectations for conduct.

- In order to avoid compromising situations, the contractor will be required to avoid contact with children.
- In the event of a contractor carrying out work in an area that is usually occupied by children, this work will be undertaken when children are not present, or where this is not possible, the contractor will work in an open environment and will be overseen by Club personnel.
- Where supervision is not possible, for example in parts of the premises where Club personnel or CCTV is not present, plans will be made to avoid contact with children.

## 4.12 Site security

Visitors to the Club, including contractors, are asked to sign in and are given a badge, which confirms they have permission to be on site. This badge should be worn at all times.

Parents who are delivering or collecting their children do not need to sign in.

All visitors are expected to observe the Club's safeguarding and health and safety regulations to ensure children are kept safe.

The Club policy is that visitors should be supervised by Club staff while on site.



## 4.13 Extended and off-site arrangements

All extended and off site (outreach) activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. Where extended activities are provided by and managed by

the Club, our own safeguarding and child protection policy apply.

If other organisations provide services or activities for children for whom the Club is responsible, we will check that they have appropriate procedures in place, including safer recruitment procedures.

When children for whom the Club is responsible attend off-site activities, including residential visits and work-related activities, the project manager or senior manager will check that effective risk assessments and safeguarding arrangements are in place, such as effective supervision.

#### 4.14 Photography and images

The vast majority of people who take or view photographs or videos of children do so for entirely innocent and legitimate reasons. Sadly, some people abuse children through taking or distributing images. We must therefore ensure that we have some safeguards in place.

To protect children we will:

- seek parental consent for photographs to be taken or published (for example, on our website, on our publications or in newspapers). If a child does not wish to have their image taken, we will respect this.
- use the child's first name with an image if consent has been given to do so.
- ensure children should be appropriately dressed with outer clothing garments covering their torso from at least the bottom of their neck to their thighs (i.e., a minimum of vest/shirt and shorts) and feature safety equipment, such as shin pads or guards.
- encourage children to tell us if they are worried about any photographs that are taken of them.
- forbid photography in private areas, such as changing rooms, toilets, showers or bedroom or whilst a child is in a state of undress.

#### Matchday photography:

Children attend games as spectators. Images of children may appear as part of the crowd on matchdays and be reproduced in official Tottenham Hotspur promotional material and appear in the public domain. The Club's terms and conditions of ticket purchase and standard ground regulations state that images may be taken of fans within the crowd and used in promotional material. Ticket holders agree to these conditions when purchasing a ticket. Any queries on promotional material featuring a child/children should be addressed to Tottenham Hotspur's Customer Care team who can be contact on the Club website: <https://www.tottenhamhotspur.com/information/contact-us/>.

The Club accepts no liability for non-Tottenham Hotspur images and reserves the right to prohibit the use of any photography, video or film on its activities or premises. This includes match days.

#### 4.15 E-Safety and social media

Children increasingly use electronic equipment on a daily basis to access the internet and share content and images via social networking sites such as Facebook, Twitter, Snapchat and Instagram.

Unfortunately some adults and young people will use these technologies to harm children. The harm might range from sending hurtful or abusive texts and emails, to grooming and enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings.

Children may also be distressed or harmed by accessing inappropriate websites that promote unhealthy lifestyles, extremist behaviour and criminal activity.

The Club's e-safety policy follows this section - it explains the professional boundaries expected between staff, children and their parents.

**Cyberbullying** and **sexting** by children on Club activities will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures. Serious incidents, such as **sexting and peer-on-peer abuse** will be managed in line with our child protection procedures and/or Managing Allegations Against Other Children policy in line with UKCCIS Guidance: Sexting in schools and colleges, responding to incidents, and safeguarding young people (2017).

Many children own or have access to hand held devices and the Club encourages parents and carers to keep their children safe when using the internet and social media at home and in the community by promoting the e-safety campaign Safer Internet Day.

As a general rule, children are not allowed to take images on Club activities, in particular images are prohibited in private areas such as: toilets, changing rooms, showers and bedrooms and when other children are in a state of undress.



## E-Safety

**Staff:** Any communication using ICT (Information Communication Technology) by staff should be carried out using Club IT, e.g. mobile phone and Club email address, this ensures that Club policies, firewall/filters and security apply.

It is important for staff to maintain professional and personal boundaries in and out of work:

- Staff should not have direct personal communication with children from Club activities using ICT, e.g. email, mobiles (unless an approved arrangement is in place).
- On Facebook, or any other social media, any requests from children or their parents should be rejected.
- Concerns arising from contact on Facebook or other social media from children should be directed to a Safeguarding Officer or the Head of Safeguarding & Welfare.

This will help to avoid blurring boundaries between personal and professional life.

- Staff should take care on how they present themselves in the public domain (e.g., internet, media) and their association with Tottenham Hotspur.
- Staff should use a disclaimer with wording such as *'these views are my own views and not those of the Club'*.
- Staff should direct any queries/clarification on this to the Social Media Manager, the Press Department or the Head of Safeguarding & Welfare.

For further information, see the Club's Social Media Policy in the Employee Handbook.

As a general policy, communication with children age under 16 is via the Club through the parent or school/organisation. However, the Club recognises that direct communication with young people may be required on certain activities for professional and welfare purposes and in such circumstances the Safeguarding Officer and Head of Safeguarding & Welfare should be consulted and protocols put in place and appropriate consent obtained from the parent.

**New legislation:** From 3 April 2017 anti-grooming legislation (Section 67 of the Serious Crime Act 2015) came into force and it became illegal for adults to send sexual communication to children under 16 years of age for the purposes of sexual gratification. The law covers both online and offline communication, including social media, email and letters.

**Filtering:** The ICT at Tottenham Hotspur has an appropriate filtering system that manages the following content (and web search): discrimination; drugs/substance; extremism; malware hacking; pornography; piracy and copyright; self harm; violence.

This includes the Academy setting at the Training Centre in Enfield and the wifi settings for Academy visitors (including parents and children), as well as the HE setting at the stadium.

The system meets the expectations laid out in 'The appropriate filtering for education settings' issued by the UK Safer Internet Centre (March 2016).

**Tottenham Hotspur Academy** has an additional 'Academy Communications Policy' which sets out how the Academy will contact players and their parents using email, mobile phones/messaging apps and the boundaries of communication between the Academy, players and parents .



## 5. CHILDREN'S ACTIVITIES

### 5.1 Good Practice

Good practice means developing **safe working practices** based on the Club's safeguarding procedures, systems and structures, including 'Good Practice Principles' that safeguard children from harm and potential abuse as well as protecting staff from potential false allegations which can arise from compromising and vulnerable situations.

#### Examples of Good Practice:

- Securing parental consent in writing for: activities, first aid/emergency treatment and photography.
- Following Codes and Conduct that define appropriate behaviour and relationships (the Club's Code of Ethics and Conduct is included in Appendix 9).
- Record keeping (e.g., accidents/injuries and treatment, consent forms, personal notes, complaints, compromising situations, physical restraint).
- Supervising children to minimise the risk of bullying.
- Risk assessment of an activity and welfare plans for events and tours.
- Promoting and respecting the rights of children.
- Promoting a child centred perspective and promoting equity\*.

\* Equity is incorporated into the Club's Equal Opportunities policy.

#### 5.1.1 Inclusive Good Practice (promoting equality and diversity)

The Club endeavours to be inclusive and provide opportunities for children and young people of all abilities and regardless of medical conditions, disabilities or allergies which they may have. Club will take reasonable steps to accommodate children's needs and will differentiate/adapt activities in order to maximise participation wherever possible. Related document: Safe Working Practice

## 5.2 SPECIAL ARRANGEMENTS

### Children and Young People on Work Experience

The Senior HR Manager and the Head of Safeguarding & Welfare should be informed of work experience placements at the Club for children of compulsory school age and young people.

- The Club's Safeguarding Policy, including its Code of Ethics and Conduct, apply to staff overseeing these placements.
- Any work experience placements must be approved by the Head of Department and be planned and structure in advanced.
- Work experience placements should not have unsupervised access to children.

The Club has procedures to safeguard children undertaking work experience, including arrangements which are in accordance with "Work Experience: a guide for Employers" (DFES, 2002).

### Children and Young People employed as Staff

Children (under 18s) employed as staff are subject to certain employment conditions and hours.

- Under Health & Safety Management Regulations, under 18s should always be under the supervision of a more experienced adult member of staff and should only undertake duties within their age and capability.
- Staff supervising children and young people should have safeguarding awareness.
  - Staff supervising children must undertake, as a minimum, an Enhanced DBS check.
  - Staff supervising young people should undertake an Enhanced DBS check.
- A risk assessment will need to be carried out and Occupational Health & Safety can advise.

For further information on employing children or young people as staff, contact the Senior HR Manager, the Occupational Health & Safety Manager or the Head of Safeguarding & Welfare who can also supply guidance on 'Child and Young Workers (U18s)'.

### Children of Compulsory School Age as Staff

Children of compulsory school age employed as staff are subject to more stringent employment conditions and hours than young people (16-18) and require close supervision. Children of compulsory school age require an **employment licence** from the Education Welfare Service in the Local Authority they intend to work, along with consent from the parent/carer and the school. Seek advice from the Head of Safeguarding & Welfare.

### Young People as Sports Coaches

Many sports have a system to allow under 18's to receive coaching or refereeing awards, but this should be about developing a young person's sense of belonging and responsibility rather than

depending on them to take full responsibility for managing a group of children. Coaches under the age of 18 can only supplement the adult coaches supervising the activity.



### Child Performance Licence

A child under school leaving age may need a licence if they take part in certain events, such as films, plays, concerts or other public performances that the audience pays to see or that takes place on licensed premises. The person in charge of the event or activity must notify their Safeguarding Officer or the Head of Safeguarding & Welfare who will advise and apply to the child's local council for a child performance licence at least 21 days before the event.

### Ball Boys/Girls

The Department for Education do not regard Match Day Ball Boys/Girls under school leaving age as either performing or employed, but rather as volunteering (unpaid) and therefore are not subject to employment or performance licences.

However, good practice for children's activities should apply with emphasis on supervision and hand overs - parental consent must be in place. In addition, the Club will be guided by Haringey Education Welfare Service.

As a general rule Ball boys/girls:

- should be aged 12 and over;
- should undergo an assessment and training to ensure they are suitable for the role;
- should wear the Club clothing provided to keep them warm.

For school-week (midweek) games, where possible, older children will be used and a parent will be on site to collect the child in person or take care of the child should he or she become ill.

Ball boy/girls activity is overseen by designated personnel who can act promptly to protect a child if necessary.

### Tottenham Hotspur Medical

All members of the medical department are in regulated activity have an enhanced DBS check and are required to attend appropriate safeguarding training as identified by the Medical Safeguarding Officer and the Head of Safeguarding & Welfare. Medical staff conform to the 'Medical Code of Conduct' which outlines safe working practice with children. Those staff working with First Team provision are also subject to a Code of Conduct for youth players "Under 18s with First Team".

**Medical appointments:** When parents are not available to accompany an Academy player, then a member of staff needs to chaperone the player to and from the hospital.

### Tottenham Hotspur Foundation

Tottenham Hotspur Foundation is included in the scope of this policy. All Foundation activities are governed by the Foundation's 'Operations Policy' which includes the following:

- |   |                                    |
|---|------------------------------------|
| • DBS detail (level of check and issue date)        | - Coaching qualifications          |
| • First Aid / Administration of Medication          | - Risk Assessment                  |
| • Service Level Agreements & Partnership Agreements | - Accident / Incident Report Forms |
| • Registration & Dispersal Procedures               | - Late Collection Procedures       |
| • Coach Guidelines & Code of Conduct                | - Adult : Child Ratios             |

**Parental Consent:** The Foundation will follow normal Club policy, including parental consent for activities (except when delivering activities on behalf of an organisation who would be responsible for obtaining that consent), and will do everything it can to safeguard children and young people in its care but recognise that in some circumstances, due to the nature of the work carried out, obtaining parental consent for specific activities is not always possible.

### Tottenham Hotspur Academy

Tottenham Hotspur Academy is committed to the safety and welfare of all children.

### Transport

The Academy has a Transport Co-ordinator who oversees safe transport arrangements across the Academy, including registered Academy players and players attending the Club on trial. The Transport Co-ordinator:

- reports to the Academy Operations Manager on the Academy's transport programme.
- ensures safe minibuses and those driving them are suitable to do so.



When children are being transported on behalf of the Club they shall, where possible, be accompanied by their team manager, a coach or a designated tour leader. In some cases, where children need to be transported unaccompanied, this will be with an approved travel company or by

an appropriate member of staff who has been appropriately screened. In either case, a child will only be transported with the prior consent of their parent/carer.

### **Accommodation - Hotels**

If an Academy player is required to stay overnight in hotel accommodation for an Academy activity, the child/children will be accompanied by at least two staff members who have been DBS checked and have undertaken safeguarding training. Parental consent will be sought in advance.

Trialists: No child under the age of 18 should stay in a hotel on their own without adult supervision (e.g., a parent or designated guardian).

### **Accommodation - Academy Host Families**

Hosting elite young players (under 18s) for the Academy is regulated activity:

- Hosts are not employees of the Club, but will be subject to host family recruitment and selection protocols, such as an application form, self-declaration form, home visits, references, plus a Health Declaration from a GP and a Host Family Code of Conduct.
- Hosts will be visited in their homes as part of the recruitment and selection process and an assessment made of the home and accommodation offered.
- A Lead Host will be identified as the key contact with the Academy and responsible for the acts and omissions of the members of the Host Family.
- The Lead Host (and partner/spouse or any other carer for the boys) will be subject to an Enhanced DBS check with Children's Barred List check for overnight accommodation. Any other household members aged 16 and over will be subject to a DBS check at basic level.
- The homestay (house) will be subject to initial and ongoing health and safety risk assessment with an annual check before the start of the new season in July. Landlord certificates (or equivalent) for electric and gas obtained.
- As part of the Academy's ongoing vigilance, Hosts will be regularly monitored and visited by the Welfare Officer.
- Host Families new to hosting will receive more frequent support visits from the Welfare Officer.
- The Welfare Officer will produce a monthly report on host families which will highlight any issues or concerns, as well as any host family monitoring visits.
- Lead Hosts will be given appropriate training and support for their role – this will be organised by the Welfare Officer. The training will include safeguarding, first aid, diet and lifestyle.
- The Club will seek guidance from specialist organisations.

### **Private Fostering**

Any potential placement of a child aged under 16 in a host family for 28 days or more may be deemed **Private Fostering** and the Head of Safeguarding & Welfare needs to be informed in order to make an assessment and inform the Local Authority, as it is a mandatory duty to inform the local authority of children in such arrangements. Also see "Child Protection - Specific Safeguarding Issues".

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

**Parental Consent:** If an Academy Player or young Professional 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.

**The Role of the Academy Welfare Officer:** The Welfare Officer should be notified of all scholar trials and work experience in order that safe arrangements are made or are in place and he can liaise with Academy staff, such as the Head of Education, Safeguarding Team and Medical as necessary.

The player will be monitored on a regular (weekly) basis by the Welfare Officer and updates given to the Academy Manager on the player's general welfare whilst on loan, trial or work experience.

**Accommodation:** If the new club is not located within a reasonable travelling distance from the player's current address the Academy will insist that, where possible, players are placed in host family accommodation during their time away from the Club and not in hotel accommodation, and the Welfare Officer or, in his absence, an Academy senior manager, will visit the accommodation to make an assessment and report back to the Academy Manager.

**Safe environment:** The Academy official making the arrangement should seek reassurance in writing that the player is staying in a safe environment where safe practice protocols have been carried out (e.g., DBS checks, safeguarding, first aid training, gas and electrical certificates, health & safety checks).



**Visiting trialists:** For players under the age of 18 who are joining Tottenham Hotspur Academy 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. Where accommodation is required during the trial period, the player should be accompanied by an appropriate adult (ideally a parent) – this is the first and preferred option for a trialist’s initial visit – and a local hotel may be used. It is the responsibility of the child’s parent to ensure safe travel and accommodation arrangements and if the child is accompanied by an adult who is not a parent then it is good practice for separate rooms to be booked. After the first few initial visits, host family accommodation may be considered if the child is not accompanied by an appropriate adult.

### **U18, 21 & First Team Progression**

As players progress through the Academy system they may have the opportunity to train and play with the adult provision of the Club.

The Club will support the player(s) during this transition and the preparation starts in Youth Development Phase through to the Professional Development Phase with extra activities to develop life skills and independence in the education programme, along with support from Academy staff - this helps to build resilience.

Staff working with Development and First Team provision are DBS checked and receive safeguarding training or awareness and follow a Code of Conduct for youth players in an adult provision “Under 18s with First Team” which identifies vulnerability, risks and promotes vigilance from staff to safeguard the welfare and wellbeing players.

### **Academy Tours and Tournament**

Guidance for tours and tournaments will be carried out in line with Premier League rules, including Appendix 12 of these rules. This is covered in greater depth in the ‘Academy Tours and Tournament Policy’.

Key principles for Match Days, Tours and Tournaments

The Academy endeavours to ensure players’ safety at all times:

- When travelling to and from venues, Academy staff will be responsible for players at all times.
- Vehicles used for carrying players and staff will be roadworthy, checks to be made on vehicles on a weekly basis and vehicles insured for the purpose. Alternatively, a travel company will be used and assurances sought that vehicles are roadworthy and staff are appropriately qualified. Any hired vehicles and drivers will be hired from reputable companies.
- All drivers of any vehicles used to transport players and coaches will have passed relevant driving tests, assessments and hold proper insurance to do so.
- On longer journeys two drivers will travel together in minibuses to enable rest periods to be taken.
- Adequate adult/player ratios will be followed for any residential tours.

If residential tours are undertaken, accommodation booked will be of suitable standard for players’ safety and comfort and a pre-visit will be made by a member of the Academy. All parent permissions will be sought. Staff do not share rooms with players.

### **E-Safety**

Academy scholars receive E-Safety advice and guidance to keep themselves safe online.



## **6. CHILD PROTECTION**

The impact of child abuse, neglect and exploitation should not be underestimated.

Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried.

For some children, full recovery is beyond their reach, and the rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

### **Recognising abuse**

To ensure that children are protected from harm, staff need to understand what types of behaviour constitute abuse and neglect.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone, or leaving knives or matches within reach of an unattended toddler.

Abuse may be committed by adult men or women and by other children and young people.

## 6.1 Child abuse and neglect

Child welfare concerns may arise in many different contexts, and can vary greatly in terms of their nature and seriousness. Children may be abused in a family, in an institutional or community setting, by those known to them or by a stranger, including, via the internet. Abuse and neglect can happen over a period of time, but can also be a one-off event.

Child abuse commonly occurs within **relationships of trust or responsibility** (including parents/carers) and is always an **abuse of power/position/authority or a breach of trust**.

### Facts:

- Children living away from home are vulnerable to abuse.
- Children are also abused by other young people and, on occasion, by young children.
- Abuse can happen to a child regardless of their age, gender, race, ability or class.
- Mal-practice can contribute and sustain an environment where abuse can occur.
- A person may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm.

Children and young people often find it very difficult to talk about the abuse they are experiencing. So adults have a vital role to play in looking out for the possible signs, including a **sudden and noticeable change of behaviour**.

The warning signs and symptoms of child abuse and neglect can vary from child to child.

- **Disabled children** may be especially vulnerable to abuse, because they may have an impaired capacity to resist or avoid abuse. They may have speech, language and communication needs which may make it difficult to tell others what is happening.
- **Child development:** Children also develop and mature at different rates so what appears to be worrying for a younger child might be normal behaviour for an older child.
- **Parental behaviours** may also indicate child abuse or neglect. This could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.

It is important to recognise that a warning sign doesn't automatically mean a child is being abused.

### Warning Indicators

A **noticeable change** in the child's or young person's **behaviour or appearance** is an indicator. Recognising abuse may be a cluster of symptoms or repeating patterns. Here are a few example signs that would raise concern:

- Notable changes in behaviour or character, such as aggression or withdrawal;
- Severe/unexplained bruising or burn marks or scalds.
- Inadequate or inappropriate clothing for child's size, weather or time of year;
- sleeping disorders or bed wetting in children aged 9+ through to teens;
- reluctance to remove clothing for activities: arms and legs covered to hide bruises/marks;
- persistently dirty with body odour / smearing;
- inappropriate sexualised behaviour or words for the age of child (eg, "You're so fit Sir/Miss);
- drawings/doodling of sexually explicit conduct– in particular where it is traced over heavily;
- self harming (in particular around hidden areas such as back of legs, arms) and eating disorders;
- Children who talk about running away;
- Children who drink alcohol regularly from an early age;
- Children who are concerned for younger siblings without explaining why;
- Parents who are dismissive and non-responsive to practitioners' concerns;
- Parents who collect their children from school when drunk, or under the influence of drugs;

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the Head of Safeguarding & Welfare to decide how to proceed.

**It is very important that staff report their concerns – they do not need 'absolute proof' that the child is at risk.**

## 6.2 Types of abuse and neglect

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.

**Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development.

- It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
- It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.
- It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

- The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.
- They may also include non-contact activities, such as involving children in looking at (or in the production of) sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers); or
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**Bullying:** Bullying is "*the repetitive, intentional hurting of one person or group by another person or group, where the relationship involves an imbalance of power.*" The Anti-Bullying Alliance.

This definition includes cyber-bullying. Bullying can be physical, verbal or psychological. It can happen face to face or through cyberspace (cyberbullying).

- Children are vulnerable to abuse by their peers.
- Bullying can and does occur anywhere there is inadequate supervision.
- The Club has an Anti-Bullying policy. All activities with children are covered by the Club's Anti-bullying policy.
- Incidents of cyber-bullying should be brought to the attention of staff or a senior manager and the messages retained as evidence.
- Although most 'low level' incidents will be dealt with at the time by coaches/staff, all will be recorded and reported to the next level of management to determine whether further action



should be taken. However, if the bullying is severe (e.g. a serious assault), or if the bullying behaviour persists despite efforts to deal with it, incidents should be referred to a Safeguarding Officer or the Head of Safeguarding & Welfare. Any assault is likely to be a criminal offence and may be referred to the police.

The subject of bullying is promoted through Anti-Bullying Week in November.

### 6.3 Identifying vulnerable children

Under 5s (especially babies under 18 months), Looked After Children and children with Special Education Needs or Disability (SEND) can face additional safeguarding challenges and are more vulnerable to abuse (including bullying) and exploitation. Risk of abuse or exploitation is increased if a child experiences poverty, mental health issues, substance abuse, homelessness, political instability and social exclusion.

Other **high risk factors** that may make a child more vulnerable is when there is **compromised parenting**: when a parent's capacity to safeguard and appropriately care for their child(ren) is limited: Substance misuse, domestic violence and parental mental ill health pose significant **risks factors** for children and it is the combination of these factors which is particularly toxic.

Other **factors** that raise a concern with children are:

- **related issues**: sexually harmful behaviour, spirit possession/witchcraft.
- **special circumstances**: gangs, honour-based violence, young carers, truants (frequent school absences), missing from care or home, violent extremism.

As concerns, these need to be flagged and reported.

### Children who may be particularly vulnerable

For all children receive equal protection, special consideration must be given to children who are:

- disabled or special educational needs (SEN) situations
- young carers
- affected by parental substance misuse, domestic violence or parental mental health
- asylum seekers
- living away from home (short and long term)
- vulnerable to being bullied, or engaging in bullying
- transient lifestyles
- living in chaotic and unsupportive home
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
- at risk of sexual exploitation
- do not have English as a first language
- at risk of female genital mutilation (FGM)
- at risk of forced marriage
- at risk of being drawn into extremism

This list provides examples of additionally vulnerable groups and risk of abuse or exploitation is increased - it is not exhaustive. Special consideration includes the provision of safeguarding information and resources in accessible formats and language for children with communication needs

### Looked After Children (LAC) / Children in Care

The most common reason for children becoming looked after is as a result of abuse or neglect. Staff should have extra vigilance to keep Looked After Children safe.

- The Safeguarding Officer and the Head of Safeguarding & Welfare should be informed of activities involving Looked After Children.
- The Project Manager should have details of the child's social worker and the name and contact details of the social worker, along with **escalation contacts** when people are not contactable (eg, out of hours, on leave/half term or holiday periods, in meetings).
- It may be necessary for staff to have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child.



### 6.4 Specific safeguarding issues

The Club will refer to experts and professional organisations that are best placed to provide up-to-date guidance and practical support on specific safeguarding issues.

Broad government guidance on the issues listed below can be accessed via the GOV.UK website or from the NSPCC website (nspcc.org.uk):

- child sexual exploitation (CSE)
- domestic violence
- fabricated or induced illness
- female genital mutilation (FGM)
- bullying including cyberbullying
- drugs
- faith abuse
- forced marriage

- gangs and youth violence
- private fostering
- sexting
- gender-based violence/violence against women and girls (VAWG)
- trafficking
- mental health
- radicalisation
- teenage relationship abuse

### Minority ethnic children

*Working Together* identified a range of emerging child protection issues, including:

- Forced marriage
- Child abuse linked to belief in 'spirit possession'
- Sexual exploitation
- honour-based violence (HBV)
- FGM
- Child victims of trafficking

(Source: Child Protection for Minority Ethnic Children, NSPCC)

### Risky Behaviour

Risky or negative behaviour in children and young people includes: **drinking, drug use, smoking, youth crime, violence and conduct disorder** (a pattern of repeated and persistent misbehaviour), **suicide, early sexual behaviour and teenage pregnancy**.

Other risk behaviours include: **social isolation and loneliness, anxiety and depression, self-harm, body appearance issues and eating disorders**. Risk behaviours associated with digital media are: **sexualisation and pornography, cyberbullying and violent computer games**.

Risk behaviours tend to '**cluster**' and participation in multiple risk behaviours is associated with range of negative outcomes such as low educational attainment, being bullied and emotional health problems. The risk of suicide for men increases markedly between the ages of 15-19 and 20-24.

(Source: Risk behaviours and negative outcomes, September 2014, Cabinet Office Horizon Scanning Programme Team)

## 6.5 ISSUES

See Appendix 1 for further information on CSE, FGM and radicalisation.

**Child sexual exploitation (CSE)** *is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.* (new definition of CSE from Department of Education & Home Office, February 2017)

What marks out exploitation is an **imbalance of power in the relationship**.

Sexual exploitation involves varying degrees of **coercion, intimidation or enticement**, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. A common feature of sexual exploitation is that the child often does not recognise the coercive nature of the relationship and does not see themselves as a victim.

All staff should be aware of the indicators of sexual exploitation and all concerns or suspicions must be reported. It may also be linked to **child trafficking**. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

The child may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.



### Female Genital Mutilation (FGM)

There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person.

Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

**High Risk Time:** This procedure often takes place in the summer, as the recovery period after FGM can be 6 to 9 weeks.

**High Risk Groups:** FGM affects girls particularly from north African countries, including Egypt, Sudan, Somali, Kenya, Ethiopia, Sierra Leone, Nigeria, Eritrea, Yemen, Indonesia and Afghanistan.

## Radicalisation

Radicalisation is a term that refers to a **process** by which a person comes to support terrorism and forms of extremism leading to terrorism. During that process, it is possible to intervene to prevent vulnerable people being drawn into terrorist-related activity.

Radicalisation is also described as the process where someone has their vulnerabilities or susceptibilities exploited towards crime or terrorism - most often by a third party with their own agenda. Some people (children or adults) more vulnerable to radicalisation include those who may be isolated/marginalised in society (eg, through mental health or learning disability) and have no one to turn to. Vulnerable people, including children, young people and adults at risk can be exploited by people who seek to involve them in terrorism or activity in support of terrorism.

## County Lines

'County lines' is the police term for urban gangs supplying drugs to suburban areas and market and coastal towns. It involves child criminal exploitation (CCE) as gangs use children and vulnerable people to move and drugs and money. See Appendix 1 - Further information on key issues

## Children with sexually harmful behaviour (SHB)

Children may be harmed by their peers (other children or young people). Staff will be aware of the harm caused by bullying and will use the Club's **anti-bullying procedures** where necessary.

However, there will be occasions when a child's behaviour warrants a response under child protection rather than anti-bullying procedures. In particular, research suggests that up to 30 per cent of child sexual abuse is committed by someone under the age of 18.

Of all adult sex offenders, approximately half had committed their first offence as a juvenile with subsequent escalation in frequency and severity. Many young people do not continue their sexually harmful behaviour into adulthood, but without intervention, may develop alternative antisocial behaviours as they mature.

Children have been found to engage in a wide range of sexually harmful behaviours both contact (touching, masturbation, penetration) and non-contact (exhibitionism, obscene communication, voyeurism). Sexually harmful behaviour by children must be recognised as harmful both to the victim and the child who abuses.

Staff who become concerned about a child or young person's sexual behaviour, including any known online sexual behaviour, should discuss with their line manager and speak to their Safeguarding Officer or Head of Safeguarding & Welfare as soon as possible.

The management of children and young people with sexually harmful behaviour is complex and the Club will work with other relevant agencies. Young people who display such behaviour may be victims of abuse themselves and any sexualised behaviour on the part of a child or young person will be responded to in line with the **Managing Allegations against other Children** policy, which means referral out to social services or police.

## Domestic Abuse

Domestic abuse is any incident of threatening behaviour, violence or abuse (psychological, physical, sexual, financial or emotional) between adults who are or have been intimate partners or family members, regardless of gender or sexuality'. Domestic abuse rarely exists in isolation: many parents also misuse drugs or alcohol, experience poor physical and mental ill health and have a history of childhood experiences themselves. 

Children suffer both directly and indirectly if they live in households where there is domestic abuse. There are different types of domestic abuse: physical, sexual, emotional or mental. Research evidence indicates a strong link between domestic abuse and all types of child abuse and neglect.

Children who are victims of domestic abuse may have feelings of guilt and self-blame. They may be nervous and exhibit behaviour that includes destructiveness, disobedience and withdrawal.

Abuse in the domestic context includes physical violence, emotional or psychological abuse, sexual abuse, financial control, and social isolation or movement restriction.

## Teenage Relationship Abuse

A recent NSPCC survey showed that a quarter of girls and 18 per cent of boys have experienced physical violence in a relationship. Abuse in teen relationships covers more than physical violence. Other examples of this type of abuse include: pressuring a partner into having sex; controlling behaviour; unnecessary jealousy or anger.

### Faith Abuse (Spirit Possession or Witchcraft)

Some faiths believe that spirits and demons can possess people (including children). Any form of physical violence or psychological pressure to get rid of the possessing spirit is abuse, regardless of whether there was a purported “intention” to help the child.

### Forced Marriage

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced (pressured or bullied) into it – going against their will. Coercion may include physical (including threats, actual physical violence and sexual violence), psychological (for example, when someone is made to feel like they’re bringing shame on their family), financial (taking wages or not giving any money), sexual and emotional pressure. Children may be married at a very young age, and well below the age of consent in England.

Staff should be particularly alert to suspicions or concerns raised by a child about being taken abroad and not be allowed to return to England. England and Wales forced marriage is a criminal offence.

A forced marriage is not the same as an arranged marriage: an arranged marriage will have the consent of the prospective spouses.

### Honour Based Violence

An honour crime involves violence committed by those who aim to protect the reputation of their family or community. Honour crimes are usually incidents or crimes which are, or may have been, committed to protect or defend the honour of the family and/or community - these can include physical assaults, abduction and even murder.

### Trafficking and Modern Slavery

Human trafficking is a modern-day form of slavery involving the illegal trade of people for exploitation or commercial gain. Human trafficking is: movement or recruitment *by* deception or coercion *for* the purpose of exploitation. The main forms of slavery are: forced labour; forced criminality; forced marriage; sexual exploitation; domestic servitude; child slavery.

Child trafficking is child abuse. Children are recruited, moved or transported and then exploited, forced to work or sold. Many children are trafficked into the UK from abroad, but children can also be trafficked from one part of the UK to another. Modern slavery involves exploitation; deception and coercion; movement and recruitment, but in child trafficking the elements of *deception and coercion* are not needed. Child trafficking is also linked to **Child Sexual Exploitation (CSE)**.

### Private fostering arrangements

A private fostering arrangement occurs when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child’s parents. It applies to children under the age of 16, or aged under 18 if the child is disabled. Children looked after by the local authority or who are placed in a residential school, children’s home or hospital are not considered to be privately fostered.

Most privately fostered children remain safe and well but safeguarding concerns have been raised in some cases so it is important that schools are alert to possible safeguarding issues, including the possibility that a child has been trafficked into the country.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children’s services as soon as possible.



## 6.6 Reporting

### If you are concerned about a child's welfare

There will be occasions when staff may suspect that a child may be at risk of harm.

The child's behaviour may have changed and be out of character, they may write stories or draw images that reveal confusion or distress, or physical but inconclusive signs may have been noticed.

In these circumstances, staff should give the child the opportunity to talk. The signs they have noticed may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill or an accident has occurred.

Following an initial conversation with the child, if the member of staff remains concerned, they should discuss their concerns with their manager, safeguarding officer or Head of Safeguarding & Welfare.

### It is fine for staff to ask the child if they are OK or if they can help in any way.

Staff should record these early concerns (the Incident Form may be used - it is a useful guide for making an accurate record).

If the child does begin to reveal that they are being harmed, staff should follow the advice below.

Concerns which do not meet the threshold for child protection intervention will be monitored.

### Taking action

**Any child could become a victim of abuse. Staff should always maintain an attitude of "it could happen here".**

Key points for staff to remember for taking action are:

- discuss your concern with your line manager and report it your Safeguarding Officer or the Head of Safeguarding & Welfare – follow the procedure for your activity.
- in an emergency take the action necessary to help the child, if necessary call 999 or 101 for local police.
- do not start your own investigation
- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- make a record and use the Incident Form to guide you.
- seek support for yourself if you are distressed.

### If a child discloses to you

If a child discloses about any risks to their safety or wellbeing, **the staff member will need to tell the child know that they must pass on the information** – staff are not allowed to keep secrets.

### How to respond

In the event that a child makes an allegation or disclosure of abuse against an adult or another child or young person, it is important that you:

- **Listen** and/or closely observe their presentation and behaviour;
- Do **not** attempt to question or interview them yourself;
- Let them know that you will need to tell someone else in order to help them;
- **Do not promise to keep what they tell you secret;**
- Do not speak with the alleged person or parents/carers of the child;
  - **Respond appropriately:** make notes and discuss with your line manager;
  - **Report your concerns:** Contact your Safeguarding Officer or the Head of Safeguarding & Welfare.
  - **Record your observations:** Complete an Incident Form and submit to the Head of Safeguarding & Welfare. Keep your own personal notes.

**IMPORTANT:** If a child starts disclosing something, but does not continue when he/she is told that it cannot remain confidential, this needs to be raised as a concern.

### Reporting procedure for activities in schools (or other organisations)

When delivering activities in a school or other organisation or directly under the supervision/management of school/organisation staff, the school's/organisation's arrangements for child protection will apply:

- You must inform the designated teacher or person for that school/organisation, who will follow the Local Safeguarding Children Board (LSCB) procedures.
- You should then inform your Safeguarding Officer or the Head of Safeguarding & Welfare.



When delivering activities in partnership with a school, but on Club premises or out of school hours and without supervision from the school/organisation, follow the Club's procedures.

### Notifying parents

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

However, if the Club believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care.

### Referral to children's social care

The Head of Safeguarding & Welfare will make a referral to children's social care if it is believed that a child is suffering or is at risk of suffering significant harm.

The child (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

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

### Reporting directly to child protection agencies

Staff should follow the reporting procedures outlined in this policy. However, when there is concern about the child's immediate safety, they may also share information directly with children's social care, police or the NSPCC if:

- the situation is an emergency or out of hours;
- the Head of Safeguarding & Welfare or the deputy are unavailable;
- a direct report is the best way to ensure the child's safety at that time;
- for any other reason they make a judgement that direct referral is in the best interests of the child.

The Safeguarding Officer and the Head of Safeguarding & Welfare should be updated on the course of action taken and the Incident Form completed without delay in order to capture the information.

## 6.7 Confidentiality, Information Sharing and Storage

**Confidentiality:** All matters relating to child protection are confidential and information is disclosed on a need to know basis only.

**Information Sharing:** Data Protection legislation permits data information sharing: "*If a professional has concerns about a child's welfare and believes they are suffering or likely to suffer significant harm they should share the information with children's social care*". This is reflected in the Guidance "Working Together to Safeguard Children 2018".

Information sharing is guided by the following principles: the information is necessary and proportionate; relevant; adequate; accurate; timely and secure.

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

**Storage of Information:** Child protection information will be stored and handled in line with the Data Protection Act 1998. Information will be stored separately from other records and in a secure place with limited access to designated people, in line with the NSPCC Guidance on Child Protection Records Retention and Storage and data protection laws (e.g., that information is accurate, regularly updated, relevant and secure).

Written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals.

The Head of Safeguarding & Welfare will normally obtain consent from the child and/or parents to share sensitive information within the Club or with outside agencies. Where there is good reason to do so, the Head of Safeguarding & Welfare may share information *without* consent, and will record the reason for not obtaining consent.

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

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



## REPORTING PROCEDURES

### Action when a child has suffered or is likely to suffer harm

#### RECOGNISE possible abuse

- Child or young person informs you of a possible abuse situation (*allegation of suspected abuse*).
- Through observation or through a third party you become aware of a possible abuse situation.

You have any concerns or information about inappropriate behaviour or other such related information about a child or staff member.

#### RESPOND appropriately

- **Remain calm: stop, listen:**
- If child or young person is present, reassure him/her they are not to be blamed.
- Keep questions to a minimum.
- **Don't** make promises of confidentiality or outcome.
- **Don't** ask leading questions / **Don't** investigate.

Is a child in need of immediate medical attention?

YES

NO

#### MEDICAL ATTENTION:

- Call for an ambulance.
- Inform parents\* you are doing this.
- Inform doctor of your concerns in relation to child protection issues.
- The doctor will take appropriate action.
- Inform your manager and report (see below).

\* If parents are allegedly involved in the abuse, only inform them that you are taking the child to hospital. **Do not** share any other information.

#### WHERE HAS THE INCIDENT OCCURRED?

- **Club activity,**
  - **on Club premises,**
  - **out of school hours or**
  - **elsewhere.**
- Follow the Club's reporting procedures.**

- **Activity delivered in a school/ organisation or**
- **directly under the supervision/management of school/organisation staff**

**Inform the designated teacher or person for the school/ organisation. Or speak with your Safeguarding Officer or Head of Safeguarding & Welfare.**  
**NOTE: If the concern is about school staff – speak with the Headteacher only.**

#### REPORT your concerns

Does the abuse involve your Safeguarding Officer

YES

NO

Contact the Head of Safeguarding & Welfare (within 24 hours). If abuse involves the Head of Safeguarding & Welfare, the Club Safeguarding Lead must immediately be contacted.

Contact your Safeguarding Officer. If unavailable, contact the Head of Safeguarding & Welfare or Deputy. (within 24 hours)

#### RECORD your observations

- **Record:** Make a factual record and keep your own personal notes.
- Seek support from your manager or safeguarding officer.

- Head of Safeguarding & Welfare will maintain the oversight.
- Make a factual report on the electronic safeguarding platform (LOCKER)
- Await further instructions/guidance from your safeguarding officer or Head of Safeguarding & Welfare

If you are concerned for the immediate safety of a child or young person and believe them to be at risk of "significant" harm as outlined in the Club/Foundation/Womens "Safeguarding Children" policy, you must immediately contact your Safeguarding Officer. If you are unable to make contact with your Safeguarding Officer or the Head of Safeguarding & Welfare, contact emergency services on 999 who will advise you further and immediately make a factual report on the electronic safeguarding platform

If for any reason, the person reporting the incident believes that the concerns are not taken seriously, follow the **Whistleblowing** procedure in the Employee Handbook.



## 6.9 Reporting Procedure for Safeguarding Officers

The Club is not an expert in child protection and refers issues to appropriate agencies.

Upon being notified of an allegation of abuse against a member staff:

1. Safeguarding Officers under the supervision of the Club's Head of safeguarding & Welfare will ask for a factual statement to be recorded on LOCKER (safeguarding case-management platform) from the person making the report – this must be reported within 24 hours of the member of staff receiving the disclosure or being alerted to the concern.  
If any statement has been made by the child, this should be reported in the child's own words. These reports should be confined to facts and should not include any opinion, interpretation or judgement.
2. If the report involves an allegation about a member of staff, this will be referred out to Haringey's LADO (Local Authority Designated Officer) within one working day (See Managing Allegations Policy for allegations against staff).  
Otherwise, if abuse is suspected, the department relevant Safeguarding officer will make contact with children's social care where the incident occurred or where the child lives\*. Children's social care may involve the police.  
The Head of Department (or, if the Foundation, the Chief Executive Officer) will be informed of the referral and the Club Senior Safeguarding Lead will be informed.  
The parents/carers of the child will be contacted as soon as possible following advice from children's social care or the police.
3. The Safeguarding Officer will ensure that any child concerned is immediately removed from any possible risk of harm.
4. If the allegation relates to a member of staff, the Head of Safeguarding & Welfare will refer to the Club's Managing Allegation Policy and follow the process as it is outlined within that policy.
5. On confirmation that a referral has been accepted:
  - The Head of Safeguarding & Welfare will notify the FA Safeguarding Team (and other relevant Sport Governing Body), using the FA's Affiliated Football Referral Form (E: [safeguarding@thefa.com](mailto:safeguarding@thefa.com)). The FA will deal with any media enquiries.
  - The Head of Safeguarding & Welfare will also notify the Safeguarding Lead at the Premier League (E: [safeguarding@premierleague.com](mailto:safeguarding@premierleague.com)).
  - Tottenham Hotspur Foundation: If the referral relates to a member of staff, worker, consultant, third party or volunteer then the Premier League Charity Fund (E: [safeguarding@plcf.co.uk](mailto:safeguarding@plcf.co.uk)) and the Charity Commission (E: [RSI@charitycommission.gsi.gov.uk](mailto:RSI@charitycommission.gsi.gov.uk)) must be informed.  
Note: If the abuse relates to a participant disclosing abuse outside the Foundation, this does not need to be shared with the PLCF or Charity Commission. The Charity Commission are only expecting reports regarding abuse or harm to beneficiaries within the charity's care.
6. All information will be dealt with confidentially and shared only with the people on a need-to-know or who-must-know basis.
7. If the Head of Safeguarding & Welfare is implicated, the Head of HR should be contacted who will inform children's social care in line with the procedure in this section.

Further Information on allegations against staff or volunteers can be found in the Managing Allegations Policy which forms part of the safeguarding portfolio.

\*Tottenham Hotspur has children attending who live in a number of different London boroughs. If there is a need to make a referral to Children's Social Care (CSC), the assigned Safeguarding Officer or Head of Safeguarding & Welfare, will use the LSCB website for the local authority where the child lives to find out their referral process and follow the specific local process and procedures using the relevant referral forms.

**FURTHER INFORMATION ON KEY ISSUES:**

Below is further information on Child Sexual Exploitation (CSE), Female Genital Mutilation (FGM) and Radicalisation.

**Further information on CHILD SEXUAL EXPLOITATION (CSE)**

CSE is illegal activity by people who have power over young people and use it to abuse them sexually. Vulnerable young children are groomed and then abused, leaving them permanently traumatised.

**Children at risk of sexual exploitation are some of the most vulnerable in our society** and many have experienced abandonment or have suffered from physical and mental abuse.

Child sexual exploitation involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases the appearance of affection) as a result of engaging in sexual activities.

Sexual exploitation can take many forms ranging from the seemingly ‘consensual’ relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship.

The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops.

Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

**Trends in CSE:**

- Perpetrators are predominantly male, victims predominantly female.
- Takes place between people who are known to each other.

Most CSE is carried out by organised gangs or groups of adults. However, **peer-on-peer sexual exploitation, victimisation and abuse** are becoming more common, ie: exploitation of children by other children and perpetrators may also be victims.

**Warning signs:**

Below are warning signs that:

- indicate young people’s vulnerability prior to abuse (**List A**),
- are generally seen in young people who are already being sexually abused (**List B**).

If you identify a young person at risk of CSE, using the vulnerability factors and indicators below (any young person displaying several vulnerabilities should be considered at high risk of sexual exploitation) – you need to **report** as a child protection concern.

**A. Vulnerability Factors:** There are a number of risk groups where such abuse is more likely,

- |  |   |
|--|---|
| - Learning difficulties/disabilities, eg Asperger’s.   | - Parental drug/alcohol misuse.                   |
| - Gang association either through relatives, peers, intimate relationships or neighbourhood. | - Living in a chaotic/dysfunctional household.    |
| - Recent bereavement or loss.  | - Not engaging in education/training or work.     |
| - A history of running away or going missing   | - Friends with others who are sexually exploited. |
| - history of abuse.  | - Lacking friends from the same age group.        |
| - those in care or care-leavers (especially residential care, hostel, B&B, being homeless).  | - Unsure about their sexual orientation.          |
|  | - Young carer.                                    |
|  | - Low self-esteem or confidence.                  |

**B. Behavioural and Risk Indicators:** three or more indicators would be enough for a referral to social care.

- |   |   |
|---|---|
| - Evidence of sexual bullying.#                 | - Disclosures of abuse made then withdrawn.         |
| - Family involvement in sexual exploitation.    | - Unexplained money, gifts or mobile phones.        |
| - Older “boyfriend” / Gang-involved male peers. | - Absent from school /Bullying in or out of school. |
| - Missing from home or care.                    | - Change in physical appearance.                    |
| - Physical injuries / Drug or alcohol misuse.   | - Recruiting others in exploitative situations.     |
| - Involvement in offending.                     | - Poor mental health.                               |
| - Repeat STIs, pregnancy and terminations.      | - Self-harm or thoughts/attempts at suicide.        |

# Sexual bullying is a big indicator and maybe enough for a referral on its own. .



## Further information on FEMALE GENITAL MUTILATION (FGM)

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM and any concerns of FGM **must be reported**.

**High Risk Time:** This procedure often takes place in the summer, as the recovery period after FGM can be 6 to 9 weeks.

**High Risk Groups:** FGM affects girls particularly from north African countries, including Egypt, Sudan, Somali, Kenya, Ethiopia, Sierra Leone, Nigeria, Eritrea, Yemen, Indonesia and Afghanistan.

### Indicators

#### Before FGM happens

A girl at immediate risk of FGM may not know what's going to happen. But she might talk about:

- being taken 'home' to visit family
- a special occasion to 'become a woman'
- an older female relative visiting the UK.

She may ask a teacher or another adult for help if she suspects FGM is going to happen or she may run away from home or miss school.

#### Signs and Symptoms

A girl or woman who has had FGM may:

- have difficulty walking, sitting or standing
- spend longer than normal in the bathroom or toilet
- have unusual behaviour after an absence from school or college
- be particularly reluctant to undergo normal medical examinations
- ask for help, but may not be explicit about the problem due to embarrassment or fear.

## Further Information on RADICALISATION

Protecting vulnerable groups from the risk of radicalisation is part of the wider safeguarding duties and similar in nature to protecting children from other forms of harm (eg: gangs, sexual exploitation). During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised.

### What is 'Radicalisation'?

Radicalisation is a term that refers to a **process** by which a person comes to support terrorism and forms of extremism leading to terrorism. During that process, it is possible to intervene to **prevent** vulnerable people being drawn into terrorist-related activity.

Radicalisation is also described as the process where someone has their vulnerabilities or susceptibilities exploited towards crime or terrorism - often by a third party who have their own agenda.

### Who is vulnerable?

**Factors** associated with a person who becomes vulnerable to being drawn into terrorism include:

- |                                   |                                    |                   |
|-----------------------------------|------------------------------------|-------------------|
| - Peer pressure                   | - Influence from other people      | - Bullying        |
| - Crime and anti-social behaviour | - Lack of self-esteem or identity  | - The internet    |
| - Race or hate crime              | - Personal or political grievances | - Family tensions |

Some people (children or adults) more vulnerable to radicalisation include those who may be isolated/marginalised in society (eg, through mental health or learning disability) and have no one to turn to.

### Signs of someone 'at risk'

In the early stages, someone may talk a lot about a new friend. You may notice the person is 'out of character' or notable changes in behaviour or mood - a **cluster of signs**, such as:

- |   |  |
|---|--|
| - changes dress/appearance, behaviour,        | - language and peer relationships;           |
| - secretive behaviour;                        | - losing interest in friends and activities; |
| - showing sympathy for extremist causes;      | - glorifying violence;                       |
| - possessing illegal or extremist literature. |  |

The person may have a misguided view and in need good advice and support (intervention);



## Further Information on COUNTY LINES

County lines is the organised criminal distribution of drugs from the big cities into smaller towns and rural areas using children and vulnerable people. Although cannabis is occasionally linked to the county lines organisations, it is harder drugs that provide the focus: heroin, cocaine, and amphetamines.

The main county line gangs operate from London and Liverpool, but other groups work out of Reading, Birmingham, and Manchester. Faces from the cities are not known by police in the quieter areas and can operate more easily. At least for a time.

The influence of county lines is nationwide.

- Metropolitan Police have found gang members from Islington in 14 different police areas.
- Boys, typically 15 and 16, but sometimes younger, travel by coach, train, and taxi into rural or coastal area, with only a 'burner', or disposable phone, often stolen, and a stash of drugs.
- For the gang's security each runner only knows one other phone number along the delivery chain.

The drug runner needs a place to stay and to do this the gang will take over the home of a vulnerable person, often after following them home. This is known as "**cuckooing**". Once in the property, drugs and weapons can be stored there along with a possible venue for dealing drugs and the sexual exploitation of girls and young women.

### Recorded cases

- Children as young as 12 years old being exploited by gangs to courier drugs out of their local area; 15-16 years is the most common age range.
- Both males and females being exploited.
- White British children being targeted because gangs perceive they are more likely to evade police detection.
- The use of social media to make initial contact with children and young people.
- Class A drug users being targeted so that gangs can takeover their homes.

County lines exploitation is widespread, with gangs from big cities including: London, Manchester and Liverpool operating throughout England, Wales and Scotland.

**For example:** Tottenham in the London Borough of Haringey has a local gang that runs county lines to Aberdeen to supply oil rigs workers when they are off shift.

### Factors that heighten a person's vulnerability

Gangs are known to target vulnerable children and adults. Some of the factors that heighten a person's vulnerability include:

- Having prior experience of neglect, physical and/or sexual abuse;
- Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example);
- Social isolation or social difficulties;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other people involved in gangs;
- Having a physical or learning disability;
- Having mental health or substance misuse issues;
- Being in care (particularly those in residential care and those with interrupted care histories).

### Signs of someone 'at risk'

A young person's involvement in county lines activity often leaves signs. A young person might exhibit some of these signs, either as a member or as an associate of a gang dealing drugs. Any sudden changes in a young person's lifestyle should be discussed with them.

Some indicators of county lines involvement and exploitation are listed below, with those of heightened vulnerability being of particular concern:

- Persistently going missing from school or home and / or being found out-of-area;
- Unexplained acquisition of money, clothes, or mobile phones
- Excessive receipt of texts / phone calls
- Relationships with controlling / older individuals or groups
- Leaving home/care without explanation
- Suspicion of physical assault / unexplained injuries
- Parental concerns
- Carrying weapons
- Significant decline in school results / performance
- Gang association or isolation from peers or social networks
- Self-harm or significant changes in emotional well-being



**Bullying:** “Behaviour, usually repeated over time, that intentionally hurts another individual or group physically or emotionally” (Safe from bullying in youth activities, DCSF 2009).

**Child:** ‘Child’ may be defined as anyone younger than the minimum school leaving age. ‘Young person’ is defined as anyone over school leaving age but under 18. In terms of this policy, safeguarding and child protection, the term child or children refers to both children and young persons – anyone who has not yet reached their 18<sup>th</sup> birthday.

**Concern:** A concern is anything that compromises the safety and welfare of a child – in particular those children with vulnerabilities or vulnerability factors who may require additional vigilance. Also, a concern is anything that breaches the Club’s Code of Ethics and Conduct or safe working practice.

**Child Abuse:** involves acts of commission and omission which results in harm to the child. The four types of abuse are physical abuse, sexual abuse, emotional abuse and neglect.

**Club:** Tottenham Hotspur Football and Athletic Co. Ltd and includes other terms: Tottenham Hotspur, Spurs, THFC and includes the charitable arm of the Club, Tottenham Hotspur Foundation, which has adopted the policies and procedures of the Club.

**CPSU:** Child Protection in Sport Unit, funded by the NSPCC (National Society for the Prevention of Cruelty to Children) and Sport England.

**Disabled Person:** Anyone with a physical or sensory impairment or learning disability which has a substantial or long term effect on the ability to carry out normal day-to-day activities.

**Duty of Care:** Responsibility for the welfare and safety of children under the age of 18, and take all reasonable steps to ensure their safety and protect them from harm.

**Harm:** Harm may result from sexual abuse, physical abuse or emotional abuse or neglect, harm from poor practice or undue pressure that effects the child’s health and development. 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 the children.

**Parent:** In this document, a generic term to mean the person with parental responsibility.

**Parental Responsibility (PR):** The person with “*all the rights, duties, powers, responsibilities and authority which by law a parent of a child has in relation to the child and his property*”, Section 3 (1) Children Act 1989. This person can give permission and has decision making powers over the child – all birth mothers have PR.

**Positions of Trust:** Section 16 of the Sexual Offences Act 2003 already provides that any sexual activity involving children under 16 unlawful. The Vulnerable Groups Act 2006 defines specific roles (e.g., teachers, foster carers) and settings (e.g., educational institutions, residential care homes) where sexual activity between 16-17 year-olds and those in a position of trust, responsibility and authority constitutes a **criminal offence**: these roles will normally have power and authority - and may have key influence in a young person’s life – and will have regular contact with the young person.

Tottenham Hotspur is aware of changes to law which are set to make it illegal for sports coaches to have sexual relationships with 16/17 year old children that they are in a position of trust over. This will bring roles, such as sports coaches, in line with teachers, care workers and other statutory bodies that engage in relationships of trust over children (under 18s). This has been noted by the Club and policies will be further updated when made law (ref: NSPCC legislation changes).

**Safeguarding:** Safeguarding and promoting the welfare of children is defined in Working Together to Safeguard Children (2015) as “*The process of protecting children from abuse or neglect, preventing impairment of their health and development, and ensuring they are growing up in circumstances consistent with the provision of safe and effective care that enables children to have optimum life chances and enter adulthood successfully*”.

**Child protection** is part of safeguarding and promoting welfare and refers to “the process of protecting individual children identified as either suffering, or likely to suffer, significant harm as a result of abuse or neglect”.

**Staff:** Anyone in paid work who provides services or activities for the Club, and includes the terms: employee and personnel.

**TOTTENHAM HOTSPUR**

Official website: [tottenhamhotspur.com](http://tottenhamhotspur.com) T: 0344 499 5000  
 Email: [safeguarding@tottenhamhotspur.com](mailto:safeguarding@tottenhamhotspur.com)  
 Address: Tottenham Hotspur Football Club, Lilywhite House, 782 High Road, London, N17 0BX

**SAFEGUARDING CONTACTS****Safeguarding Lead**

Dayne Matthieu, Head of Safeguarding & Welfare W: 020 8365 5118  
[dayne.matthieu@tottenhamhotspur.com](mailto:dayne.matthieu@tottenhamhotspur.com) M: 07879 997 839

**Deputy**

Sandra Barratt, Foundation Safeguarding Mgr  
[sandra.barratt@tottenhamhotspur.com](mailto:sandra.barratt@tottenhamhotspur.com) M: 07384 818062

**Safeguarding Officers (Adults and Children)****Foundation**

Sandra Barratt, Foundation Safeguarding Mgr  
[sandra.barratt@tottenhamhotspur.com](mailto:sandra.barratt@tottenhamhotspur.com) Office: 020 8365 5138  
 M: 07384 81806

Dan Dodge – QA Manager/Safeguarding Officer  
[dan.dodge@tottenhamhotspur.com](mailto:dan.dodge@tottenhamhotspur.com) M: 07775861935

**Global Coaching****(Children)**

Natalie Pascarella, Programme Co-ordinator Office: 020 8365 5179  
[natalie.pascarella@tottenhamhotspur.com](mailto:natalie.pascarella@tottenhamhotspur.com) M: 07384 461 340

**Academy****(Children)**

Scholars

U11s-U16s

U6-U10s

Development Centres

E: [academy@tottenhamhotspur.com](mailto:academy@tottenhamhotspur.com) T: 020 3544 8500

Nick Boulli, Transport Co-ordinator &amp; Welfare Officer M: 07779 223 350

Tay Albayrak, Physiotherapist M: 07557 371 545

Gary Broadhurst, Head of Academy Football Dev M: 07825 176 866

Nick Hardy, Pre-Academy and DC Coordinator M: 07469 857946

**THE FA SAFEGUARDING TEAM**

T: 0844 980 8200 Ext 6401 or 6876 Referrals – email: [safeguarding@thefa.com](mailto:safeguarding@thefa.com)

**CHILDREN'S SOCIAL CARE****HARINGEY: Child Protection (Multi-Agency Safeguarding Hub – MASH)**

**Single Point of Access (SPA)** (Mon-Thurs 8.45am-5pm, Fri 8.45am-4.45pm) [haringey.gov.uk](http://haringey.gov.uk)  
 - Emergency Duty Team out of office, incl weekends T: 020 8489 4470  
**Designated Officer** E: [lado@haringey.gov.uk](mailto:lado@haringey.gov.uk) T: 020 8489 0000  
**Haringey LSCB** (Local Safeguarding Children Board) [haringeylscb.org](http://haringeylscb.org) T: 020 8489 2968 / 1186  
 - E: [LSCB@haringey.gov.uk](mailto:LSCB@haringey.gov.uk) River Park House, London, N22 8HQ T: 020 8489 1470 / 3145

**BARNET: Safeguarding Children**

- Multi-Agency Safeguarding Hub (Mon-Thurs 9am-5.15pm, Fri 9am-5pm) [barnet.gov.uk](http://barnet.gov.uk)  
 - Out of Office Hours Emergency Duty Team T: 020 8359 4066  
 Consultation Line (9.30am - 11.30am Tues and Wed) T: 020 8359 2000  
 T: 020 8359 4336

**BRENT: Child Protection**

- Brent Family Front Door (Mon-Fri, 9am-5pm) [brent.gov.uk](http://brent.gov.uk)  
 - Out of Office Hours Emergency Duty Team T: 020 8937 4300  
 T: 020 8863 5250

**ENFIELD: Safeguarding**

- Children's Single Point of Entry (Mon-Thurs 9am-5pm, Fri 9am-4.45pm). [enfield.gov.uk](http://enfield.gov.uk)  
 - Out of office 5pm-9am / weekends / bank hols) Select option 2 T: 020 8379 2507 / 2230  
 T: 020 8379 1000

**HERTFORDSHIRE: Children's Services**

- Children's Services (including out of hours) [hertssafeguarding.org.uk](http://hertssafeguarding.org.uk)  
 - Child Abuse Investigation Unit via 101 T: 0300 123 4043  
 T: 101

**WALTHAM FOREST: Child Protection**

- Multi-Agency Safeguarding Hub (Mon-Thurs 9am-5.15pm, Fri 9am-5pm) [walthamforest.gov.uk](http://walthamforest.gov.uk)  
 - Out of Office Hours T: 020 8496 2310  
 T: 020 8496 3000

**EMERGENCY SERVICES (Police, Ambulance, Fire)**

T: 999 or 112

**Police (non-emergency):** to contact local police or to report crime and other concerns that do not require an emergency response.  
[police.uk/101](http://police.uk/101) T: 24 hrs/7 days a week 101

**NHS 111 service:** when you need medical help fast, but it isn't a 999 emergency.

[nhs.uk](http://nhs.uk)

T: 111

**HELPLINES (24 hours: free and confidential)**

**NSPCC Helpline:** For anyone concerned about a child at risk of harm or ill-treatment.

[nspcc.org.uk](http://nspcc.org.uk)

Textphone: 0800 056 0566

T: 0808 800 5000

**ChildLine:** for children and young people. Any problem, big or small:

[childline.org.uk](http://childline.org.uk)

Textphone: 18001 0808 800 5000

T: 0800 1111 (free)

**ACT (Ann Craft Trust):** safeguarding advice for families/organisations with disabled children or adults at risk.

[anncrafttrust.org](http://anncrafttrust.org)

Safeguarding adults advice helpline

T: 0115 951 5400 (free)



## Tottenham Hotspur Safeguarding and Child Protection Policy

		Yes/ No	Comments
1. **	Does the policy/guidance affect one group less or more favourably than another on the basis of:		
1.1	<ul style="list-style-type: none"> <li>Age</li> </ul>	Yes	<p>This policy relates to anyone under the age of 18 years (children) – people aged 18 years and over have separate safeguarding adults policy – but both policies are linked to protect vulnerable groups.</p> <p>The younger the child, the greater the vulnerability and risk of abuse, in particular children and five and babies 12 months and under.</p>
1.2	<ul style="list-style-type: none"> <li>Disability</li> </ul>	Yes	<p>Children with disabilities are three times more likely to be abuse due to their circumstances and dependency on others. Either their mental or physical health have increased vulnerabilities and increased risk of all types of abuse. This policy raises awareness for staff to report and alert people to any specific issues.</p>
1.3	<ul style="list-style-type: none"> <li>Gender Reassignment</li> </ul>	Yes	<p>The transition from one sex to the other has both a physical and mental impact on individuals which adds to the vulnerability and the level of risk.</p> <p>In addition societal attitude can make this group isolated and also abused.</p>
1.4	<ul style="list-style-type: none"> <li>Marriage/ Civil Partnership</li> </ul>	Yes	<p>High levels of abuse in both forced and arranged marriages and exploitation of vulnerable women often in isolated communities.</p>
1.5	<ul style="list-style-type: none"> <li>Race, Nationality, Culture, Ethnic origins</li> </ul>	Yes	<p>A key tenet of safeguarding is that all children have the right to protection and this policy aims to ensure that all vulnerable groups, regardless of race are safeguarded. Some particular ethnic groups have cultures that can make some people in their culture more vulnerable so this policy helps to raise the awareness for staff about these groups and what action to take.</p> <p>Some cultures advocate practices such as genital mutilation for women which is illegal in Britain – this policy raises awareness for staff to raise concerns and issues</p>
1.6	<ul style="list-style-type: none"> <li>Religion or belief</li> </ul>	Yes	<p>A key tenet of safeguarding is that all children have the right to protection and this policy should ensure that all vulnerable groups regardless of religion or belief are</p>

		Yes/ No	Comments
			safeguarded. Some particular religious groups have beliefs that can make some people in their culture more vulnerable so this strategy helps to raise the awareness for staff about these groups and what action to take.
1.7	• Sex (Gender)	Yes	Evidence shows that there is a higher incidence of domestic abuse for girls and that can make them particularly vulnerable. Some cultures advocate practices such as genital mutilation on girls which is illegal in Britain – this policy raises awareness for staff to raise concerns and issues.
1.8	• Sexual Orientation including lesbian, gay and bisexual people	Yes	High incidence of domestic abuse in same sex relationships both within the relationship but also other forms of abuse from a wider society.
2.	Is there any evidence that some groups are affected differently?	No	
3.	If you have identified potential discrimination, are any exceptions valid, legal and/or justifiable?	Yes	See all the above comments.
4.	Is the impact of the policy/guidance likely to be negative?	No	
5.	If so can the impact be avoided?	N/A	
6.	What alternatives are there to achieving the policy/guidance without the impact?	N/A	
7.	Can we reduce the impact by taking different action?	N/A	

\*\* Nil impact: process stops here; complete the screening section and which is part of policy template.  
 Low impact: 1 – 3 yes's, full EIA required, but not an immediate priority, but must be completed within 6 months of policy ratification  
 High impact: 4 – 9 yes's, full EIA required using the Full EIA template. Best practice is to do so with the groups affected.

Assessment completed by: Dayne Matthieu, Head of Safeguarding & Welfare

Reviewed: May 2020