

SAFEGUARDING CHILDREN POLICY

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Excerpts of this document have been taken and adapted from the Department for Education's guidance **"Keeping Children Safe in Education 2020** and **Working Together to Safeguard Children 2018** (*updated February 2019*).

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FOREWORD

This Safeguarding and Child Protection Policy (Policy) reflects the safeguarding ethos of the Club. The Board of Directors endorses this document as part of the Club's constitution and expect all staff in the workforce community at Tottenham Hotspur to share the Club's commitment to safeguard and promote 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.



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INTRODUCTION TO SAFEGUARDING CHILDREN AT TOTTENHAM HOTSPUR

This Policy applies to Tottenham Hotspur Football and Athletic Co. Limited (known as 'the Club') and to its Group Companies, Tottenham Hotspur Football Club (trading name), Tottenham Hotspur Foundation (a registered charity – known as 'the Foundation') and Tottenham Hotspur Womens' Football Club Ltd. Any references to 'the Club' are therefore intended to apply to the Club, any of its Group Companies, to the Foundation and to the Tottenham Hotspur Women's Team.

The Club believes that children, young people and adults have the right to take part in sport in an environment which is safe and free from any risk of abuse. Tottenham Hotspur takes all reasonably practicable steps to minimise harm to children, involved in Club activities and discharge it's moral and legal responsibility to protect them. This includes the Club's responsibilities to respond to disclosures of abuse or indicators of potential harm against children.

POLICY AIM

This Policy aims to enable and empower all staff with the necessary information to carry out their moral and legal responsibilities, which contribute to the protection, and well-being of all children in our care.

Tottenham Hotspur will do this through it's continuous commitment to educate staff, safer recruitment processes and engendering a "**vigilant and listening culture**", whereby staff understand and are demonstrably committed to the organisational ethos of safeguarding and protecting children.

SAFEGUARDING BELIEF STATEMENT

The Club recognises its moral and legal responsibility to safeguard and promote the welfare of all children, and will endeavour to provide a safe and welcoming environment where children are respected and valued. The procedures contained in this Policy apply to all staff and are consistent with those of Haringey Safeguarding Children Partnership.

SAFEGUARDING 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 neglect.

All children have the right to participate, enjoy and develop through sport, in a safe and inclusive environment.

All staff have a responsibility to report and to act on any suspicion or disclosure that a child is at risk of harm.

SAFEGUARDING LEGISLATION AND GUIDANCE

This Policy is influenced and supported by the following legislation and guidance documents:

- ✘ **The Children's Act 1989** (updated in 2004 post Lord Lamming inquiry – Victoria Climbié)
- ✘ Safeguarding Vulnerable Groups Act 2006 (Act of Parliament post the Michael Richard inquiry – Soham murders)
- ✘ Human rights Act 1998
- ✘ Domestic Violence Act 2018 (replaces the Domestic Violence Act of 1996 and the amendment Act of 2002)
- ✘ The Counter Terrorism and Border Security Act 2019
- ✘ Sexual Offences Act 2003
- ✘ Working Together to Safeguard Children 2018 (statutory guidance – last revised July 2018)

- ✘ Guidance for Safer Working Practice for those working with children and young people in education settings (last revised - May 2019)
- ✘ Keeping Children Safe in Education 2019 (statutory guidance – last revised September 2019)
- ✘ London Child Protection Procedures and Practice Guidance
- ✘ The Football Association Safeguarding Policy and Procedures (revised 2019)
- ✘ The Premier League Safeguarding Policy and Procedures (revised 2020)

OTHER RELATED POLICIES

- ✘ Disclosure and Barring Service Policy
- ✘ Safer Recruitment Policy
- ✘ Managing Allegations against Staff Policy
- ✘ Safeguarding Adults Policy
- ✘ Modern Slavery Policy

DEFINITIONS:

- ✘ Abuse: Refers to the “Acts of commission or omission” that may lead to a child experiencing or being exposed to harm. The four types of abuse are physical abuse, sexual abuse, emotional abuse and neglect.
- ✘ Allegation: An alleged incident, sufficiently serious as to suggest that harm has or may have caused harm to a child/children, or that the alleged behaviour indicates the individual may pose a risk of harm to children. Issues that do not meet this threshold may constitute conduct or disciplinary issues and should be addressed by employers using the appropriate organisational procedures.
- ✘ Alternative Workers: Any individual working on behalf of the Club, who are not considered an “employee” by law (e.g Agency staff, consultants, volunteers etc.)
- ✘ CHANNEL: Channel is a multi agency safeguarding process and early intervention strategy aimed at identifying and supporting individuals (including children) vulnerable to the recruitment of violent extremism. It must be noted this includes all forms of extremism. It is a mechanism for ensuring that these individuals are assessed and supported by professionals using statutory safeguarding frameworks and multi-agency partnership working.
- ✘ Child: Includes everyone under the age of 18.
- ✘ Child Protection: a set of procedures that are required for specific children who are at risk/or are suffering from significant harm.
- ✘ Club: Tottenham Hotspur Football and Athletic Co. Ltd: including Tottenham Hotspur, Spurs, THFC and includes the charitable arm of the Club, Tottenham Hotspur Foundation, Tottenham Hotspur Womens Team, which has adopted the policies and procedures of the Club.
- ✘ Disability: 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: Description of the responsibility all staff have for the welfare and safety of children under the age of 18, and the reasonable steps taken to ensure their safety and protection.
- ✘ Extremism: The vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty, and respect and tolerance for different faiths and beliefs.
- ✘ Gross Misconduct: An action that destroys the relationship of trust between an employer and an employee.
- ✘ Harm: Referring to 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.

- ✘ Picture of Need: A combination of more than one concern for the same child. Each isolated concern may appear mild, however when viewed as a whole, may warrant a more urgent response.
- ✘ Positions of Trust: Section 16 of the Sexual Offences Act 2003 already provides that any sexual activity involving children under 16 is 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).
- ✘ Prevention & Response Team: The Club/Foundation/Womens safeguarding team with specific specialist responsibilities for the management of safeguarding and child protection.
- ✘ Radicalisation: The process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups.
- ✘ RMP: Risk Management Plan – A plan which highlights areas of safeguarding/safety risk in someone's working day, and identifies processes to minimise potential concerns as part of a working agreement between the employee (including alternative staff) and line/supervising manager.
- ✘ Safeguarding: "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" (*Working Together to Safeguard Children 2018*)
- ✘ Staff: Anyone in paid work who provides services or activities for the Club, and includes the terms: employee and personnel.
- ✘ Young People: A child who is between the age of 16 and up until the day of their 18th birthday.

EVERYONE'S RESPONSIBILITY

Roles and Responsibility

- ✘ Governance – Safeguarding Lead (Board Level)
The Club considers the safety and well-being of vulnerable groups as high priority. This is represented from Board level and permeates all aspects of the organisation. The Board has an appointed Safeguarding Lead, who is responsible for governance, ensuring that safeguarding remains a key priority for leadership and is considered in line with whole Club strategic aims and direction of travel.
- ✘ Strategic Leadership – Head of Safeguarding & Welfare
The Head of Safeguarding & Welfare has overall responsibility for safeguarding provision and arrangements across all areas of the Club and oversees and leads a team of safeguarding specialist staff. The Safeguarding Team work closely with departments to ensure the quality of safeguarding arrangements and respond to safeguarding/child protection concerns in accordance with legal guidance and expectations.
- ✘ Operational Leadership – Foundation Safeguarding Manager
The Foundation Safeguarding Manager has a deputising role to the Head of Safeguarding & Welfare and in their absence is the main point of contact for advice and guidance in response to all safeguarding/child protection matters across the Club. The Foundation Safeguarding Manager is

mainly responsible for the operational developments and safeguarding response procedures at the Foundation and reports directly into the Head of Safeguarding & Welfare.

ix The Prevention & Response Team

The Club has clearly defined procedures in place to enable safer working practices and outlines what action must be taken where there are safeguarding concerns about actual or suspected incidents of abuse/harm. There are also procedures in place for taking action when allegations are made against adults who work with children and adults at risk.

The Safeguarding Prevention & Response Team lead on safeguarding policy and practice development and ensure effective liaison with statutory agencies when the need arises.

The Prevention & Response Team constitutes :

- a. Safeguarding Officers – Assigned to an area/department
- b. Match/Event Day Duty Safeguarding Officers – Assigned per event
- c. Safeguarding Curriculum Coordinator – Assigned to the Academy

x Head of Department and Senior Staff – Staff in Leadership Roles

All staff in leadership roles are responsible for:

1. Contributing to safeguarding procedures and systems.
2. Ensuring all staff comply with safeguarding, safer recruitment and safe working practices
3. Championing safeguarding across all areas of the organisation.

xi All Staff – (This includes “Alternative Workers”)

- All staff have a responsibility to provide a safe environment for children.
- All staff have a responsibility to identify children who may need extra help or who are suffering/likely to suffer, significant harm.
- All staff have a responsibility to take appropriate action and report concerns.
- All staff should respect and abide by the Club’s Code of Ethics and Conduct.

GOOD PRACTICE GUIDANCE FOR STAFF WORKING WITH CHILDREN

All staff working in either a paid or voluntary capacity at the Club are required to adhere to specific codes of conduct where contact with children, young people or vulnerable adults are concerned.

Such codes of behaviour are intended to safeguard the well-being of children and adults and also offer protection to adults whose own vulnerability in some situations is recognised. These codes are captured in the Premier League – Guidance for Safer Working Practice

xii Position of Trust

- Staff are expected to at all times maintain healthy, positive and professional relationships with all children, participants and players. Staff are in a “**Position of Trust**” in relation to all children, participants and players and therefore must not engage in sexual relationships with them. The Club will consider such action “**gross misconduct**” and this will result in dismissal.
- 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.

⌘ Staff Training

It is the responsibility of the Club to ensure that all staff (including Alternative Workers) complete:

- An Organisational Safeguarding Induction, which will include a presentation on the Club's Safeguarding Policy and procedures – New staff
- Role Relevant Safeguarding Training – All staff

Staff in regulated activity roles (e.g teaching, coaching, medical care etc.) will be expected to maintain the necessary safeguarding training competency as is recommended. This will include completion of the FA Safeguarding Course (every 3 years).

Staff who have direct contact and whose role involves the care and supervision of vulnerable groups will have access to support via line management and supervision.

SAFER RECRUITMENT AND SELECTION OF STAFF

⌘ Recruitment Commitment

The growing awareness of the possibility of abuse by people in positions of trust and the increased understanding of the vulnerability of children and some adults, highlights the need for careful recruitment and selection of staff and alternative workers. Tottenham Hotspur take every precaution to ensure sound and thorough vetting procedures for anyone who works with or on behalf of the Club.

The organisation consistently applies a thorough and clearly defined method of recruiting staff and contractors in line with best practice. This ensures that all individuals, whatever their role are both competent and safe to work for our organisation. *(For further reading, please see the Safer Recruitment Policy and Disclosure and Barring Service Policy - <https://tottenhamhotspur.unily.com/documents/preview/9687/Disclosure-Barring-Service-Policy-V2-September-2020>)*

APPROPRIATE SHARING AND DATA PROTECTION PROTOCOLS

⌘ Safeguarding Confidentiality Statement

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

⌘ Storage of Information:

Child protection information will be stored and handled in line with the Data Protection Act 2018 and GDPR. Information will be stored separately from other records and in a secure place with access granted 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).

The Club has a clear policy on the management of records, confidentiality, and sharing of information. There is an expectation of confidentiality in the recording, use and management of personal information. Management and staff are clear about what information can be shared with relevant people within and outside of the organisation.

✘ Files on children

Concerns are recorded securely and confidentially on an individual basis on the safeguarding electronic case management platform (LOCKER) which is overseen by the Head of Safeguarding & Welfare.

REPORTING PROCEDURES – WHAT TO DO IF YOU HAVE CONCERNS FOR THE SAFETY OF A CHILD

If a child's behaviour, actions, or narrative raises worry this must be discussed with your line manager, and in a timely fashion (within a 24 hour period) reported to a member of the Safeguarding Team. It is important to remember that a child's behaviour could be out of character for a variety of reasons that may not necessarily indicate that they are at risk of abuse or significant harm. However, if concern remains after an initial conversation with the child, staff must report the concern to the Safeguarding Team, having made an accurate record of the conversations held with child.

✘ Reporting

Once a concern is reported, The Head of Safeguarding & Welfare will inform the Club Senior Safeguarding Lead of all child protection concerns within 24 hours of receiving the disclosure/concern and will discuss the plan of action to ensure the safety/well-being of the child. This includes "Specific Safeguarding Concerns" as named in the the guidance "**Keeping Children Safe in Education 2020**" and includes the Club's Prevent Duty.

✘ Disclosure of Abuse

Any child could become a victim of abuse. Staff must maintain an attitude of "**it could happen here**". If a child has disclosed that they are currently or have historically been a victim of abuse, remember the following key points:

- Do not start your own investigation. Listen to what you are told without leading the conversation. Use T.E.D questions to gain clarity and information:
 - Tell what happened
 - Explain what happened
 - Describe what happened
- Inform your line manager and immediately report the disclosure to your nominated Safeguarding Officer or the Head of Safeguarding & Welfare – they will give guidance as to the next best step in ensuring the safety of the child.
- If out of hours and you are unable to speak to a Safeguarding Officer or the Head of Safeguarding, take the action necessary to help the child and ensure their safety. If the child is in immediate danger, call 999 for local police.
- If the child is in need of immediate medical attention, contact 999 and request emergency medical services, informing them of your concerns in relation to the alleged abuse. Contact parents and inform them that emergency services/paramedics have been contacted due to the presenting injuries.

(Please note, if parents are allegedly the perpetrators of the abuse, only inform them that you are taking the child to hospital. Do not share any other information.)

- Share information on a need-to-know basis only. Do not discuss with colleagues, friends or family
- Record the disclosure on the safeguarding reporting tool (LOCKER)
- Seek support for yourself if you are distressed.

Staff must never

- Ask leading questions e.g “Was it your uncle Tom who hit you?”.
- Promise that they will keep what children tell them a secret
- Speak to the alleged abuser about the allegation
- Keep disclosures of abuse or concerns for the welfare/safety of children to themselves.

IMPORTANT: If a child starts disclosing, but does not continue when he/she is told that it cannot remain confidential, this must be raised as a concern, and a Safeguarding Officer/Head of Safeguarding & Welfare informed.

MENTAL HEALTH & WELLBEING

Staff must be aware that in some cases, mental health concerns can be an indicator that a child has suffered or is at risk of harm (abuse, exploitation, neglect or bullying). Staff working with children are in an advantaged position to identify concerning narratives, and behaviours that may suggest that the child in question may be experiencing mental health difficulties or be at risk of diminishing mental health. Children who have suffered harm or adverse childhood experiences (ACES), can be affected throughout the course of their lives, even into adulthood. Staff must therefore consider mental health concerns as a safeguarding concern, and take the necessary steps to report this to their Safeguarding Officer immediately (within a 24hour period) on LOCKER.

COVID 19

The COVID 19 pandemic has increased the vulnerability of many children and families requiring support and care. The uncertainty of this time creates unexpected anxieties and pressures for all, therefore staff are expected to be sensitive to the needs of all our service users, promoting an ongoing culture of vigilance so that through our Club and Foundation provision/activity delivery, staff remain best placed to identify, report, refer (where necessary) and support those in our care .

The Club will continue to uphold all principles outlined in this policy throughout the period of national lockdown and whilst we remain affected by the COVID 19 pandemic. Tottenham Hotspur will continue to work collaboratively with external agencies, statutory and voluntary to identify and support those most at risk of harm.

When planning and carrying out risk assessments in preparation for service delivery, staff must consider the impact that the COVID 19 pandemic has and is continuing to have on participants, players and on colleagues and the part it plays in:

- Escalating anxiety/mental health illnesses
- Increasing isolation
- Decreasing the opportunity for contact with services and professionals

FURTHER SUPPORT & INFORMATION

Staff can contact the Head of Safeguarding & Welfare or any member of the Safeguarding Team (see Appendix - Key Contact List) for further information, advice and guidance relating to the safeguarding of children.

REPORTING CHILD PROTECTION CONCERNS FLOW CHART

RECOGNISE possible concerns

- Child/young person informs you that they are at risk of harm
- Through observation or through a third party you become aware that a child/young person is at risk of significant harm

WHERE HAS THE INCIDENT OCCURRED/CONCERN RAISED?

RESPOND appropriately

Remain Calm: stop, listen:
If the child is with you reassure them

Do you need to take action to ensure the immediate safety or medical welfare of the child?

YES

Call for an ambulance. Inform parent/carer you are doing this. Inform the doctor there may be a safeguarding concern. The doctor will take appropriate action.

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

NO

Is your relevant Safeguarding Officer implicated?

YES

NO

Club activity or event. Follow the Club's policy for reporting concerns

Partner Organisation – Partnership activity/event

Inform the partner organisation's Safeguarding Lead as well as your relevant Safeguarding Officer at the Club **within 24 hrs** of the concern being raised. If the concern is about the conduct of staff at the partner organisation, speak with a Senior Lead and Safeguarding Lead only (as long as they are not implicated)

REPORT your concerns

Inform the Head of Safeguarding & Welfare. (If the Head of Safeguarding & Welfare is implicated, inform the Club Senior Safeguarding Lead immediately **within 24 hrs** of the concern being raised)

RECORD the facts

Immediately contact the relevant safeguarding officer

Create an accurate record of your notes; this must be a factual representation of what was said to you and/or what you have observed in LOCKER (safeguarding case management platform) **within 24hrs** of the concern being raised

What's Next?

Seek the support of your Safeguarding officer and line manager (if appropriate)

Await further instruction/guidance from your Safeguarding Officer or Head of Safeguarding & Welfare

Remember

If you are concerned for the safety of a child/young person and believe them to be at significant risk, you must immediately contact your Safeguarding Officer or the Head of Safeguarding & Welfare. In their absence, contact emergency services on 999 who will advise further and immediately make a factual report on LOCKER (safeguarding case management platform) **within 24 hrs** of the concern being raised.

Policy Review

This Policy is subject to regular review to ensure that it is fit for purpose. These reviews take place after all safeguarding concerns and incidents and in line with changes of legislative documents and guidance updates.

Effective Date of Policy: [February 2021]

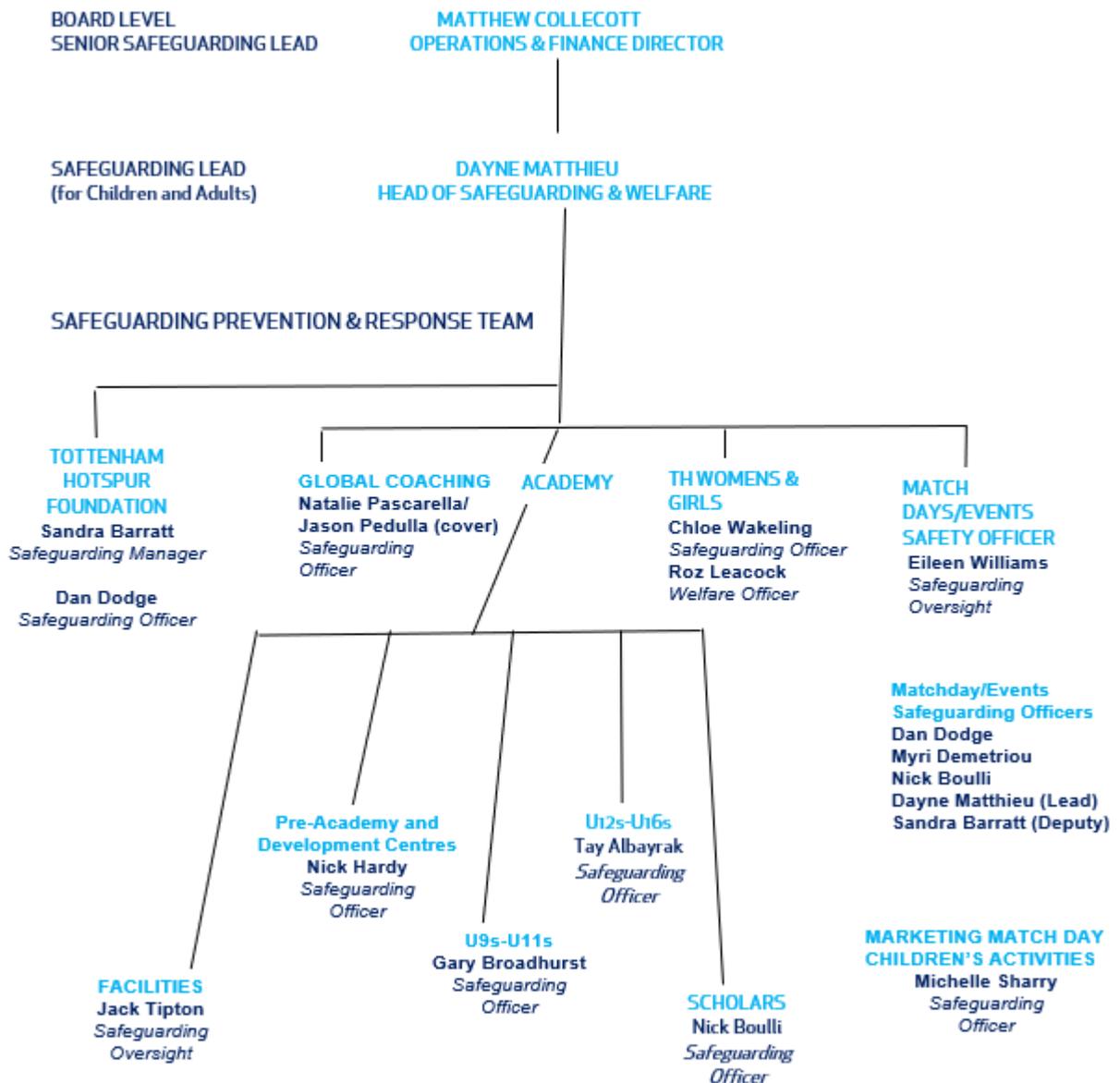
Policy Owner/Lead: [Dayne Matthieu – Head of Safeguarding & Welfare]

APPENDIX - PROCEDURE AND GUIDANCE DOCUMENTS

Safeguarding Organisational Structure

TOTTENHAM HOTSPUR

SAFEGUARDING STRUCTURE



Update: November 2020

Categories of Abuse

Physical

Physical abuse indicators can include an explanation which is inconsistent with an injury, several different explanations provided for an injury, unexplained delay in seeking treatment or reluctance to give information or mention previous injuries, for example:

- Bruising - children can have accidental bruising, but the repeated or multiple bruising on the head or on sites unlikely to be injured accidentally, i.e bruising around the face or variation in colour possibly indicating injuries caused at different times, must be considered as non-accidental unless there is evidence or an adequate explanation provided
- Fractures: the history provided is vague
- Burns and scalds (could include cigarette burns marks)
- Bite marks

Emotional

Emotional abuse may be difficult to recognise. It is the persistent emotional ill-treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve making the child feel or believe that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying causing children to frequently 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. The indicators of emotional abuse are often also associated with other forms of abuse. The following may be indicators of emotional abuse:

- Developmental delay
- Abnormal attachment between a child and parent/carer e.g. anxious, indiscriminate or detachment
- Indiscriminate attachment or failure to attach
- Aggressive behaviour towards others
- Scape-goated within the family
- Frozen watchfulness, particularly in pre-school children
- Low self-esteem and lack of confidence
- Withdrawn or seen as a 'loner' – difficulty relating to others

Sexual

Sexual abuse is when adults, or other children, use children to meet their own sexual needs. It involves forcing or enticing a child to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve contact including penetrative acts or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways. Recognition can be difficult, unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional/behavioural. Some behavioural indicators associated with this form of abuse are:

- Inappropriate sexualised conduct
- Sexually explicit behaviour, play or conversation, inappropriate to the child's age
- Continual and inappropriate or excessive masturbation
- Self-harm (including eating disorder), self-mutilation and suicide attempts

- Involvement in prostitution or indiscriminate choice of sexual partners
- An anxious unwillingness to remove clothes e.g. for sports events (but this may be related to cultural norms or physical difficulties)

Some physical indicators associated with this form of abuse are:

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

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. It can cover different aspects of parenting. Indicators include:

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

Bullying

Bullying is behaviour that hurts someone else. It includes name calling, hitting, pushing, spreading rumours, threatening or undermining someone. It can happen anywhere; at school, at home or online. It's usually repeated over a long period of time and can hurt a child both physically and emotionally.

There are different types of bullying and it can include:

- Physical bullying: hitting, slapping or pushing someone
- Verbal bullying: name calling, gossiping or threatening someone
- Non-verbal abuse: hand signs or text messages
- Emotional abuse: threatening, intimidating or humiliating someone
- Exclusion: ignoring or isolating someone
- Undermining, constant criticism or spreading rumours
- Controlling or manipulating someone
- Making silent, hoax or abusive calls
- Cyberbullying – which is bullying that takes place online

The following types of bullying are also hate crimes:

- Racial, sexual, transphobic or homophobic bullying
- Bullying someone because they have a disability.

Specific Safeguarding Concerns – Further Reading

(Informed by/taken from Annexe A – Keeping Children Safe in Education 2020)

Children Missing From Education

All staff should be aware that children going missing from education, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Activities delivered by Academy, Foundation, Girls Football and Global Coaching should be particularly mindful of children on their activities, who may have poor, unexplained attendance at school and report to Club/Foundation safeguarding staff to ensure that we can work in partnership with services to support risk identification and early intervention plans.

Children with Family Members in Prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. Staff working with children and young people must be aware of the risks and report to Club/Foundation safeguarding staff to ensure children and young people affected have access to the best support and interventions.

Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity:

- (a) in exchange for something the victim needs or wants, and/or
- (b) for the financial or other advantage of the perpetrator or facilitator and/or through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see page 20 for more information), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss school or education or do not take part in education.

Child Sexual Exploitation (CSE)

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child 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. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). The above CCE indicators can also be indicators of CSE, as can:

- Children who have older boyfriends or girlfriends; and
- Children who suffer from sexually transmitted infections or become pregnant.

For further reading on CSE: <https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners>

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes and care homes.

Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanisms should be considered.

If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation. For further information on County Lines :

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/839253/moj-county-lines-practical-guidance-frontline-practitionerspdf.pdf

Domestic Abuse

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members.

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. It is important for staff to be vigilant for signs or indicators that could suggest that a child or young person may be in need of support and immediately contact Club/Foundation safeguarding staff to report your concerns. For further information on Domestic Abuse: <https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/domestic-abuse/signs-symptoms-effects/>

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child’s welfare. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this

does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homeless Reduction Act Factsheets. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

As with schools and colleges, The Club will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require the intervention of social care to act as the lead professional on behalf of the child/children at risk. The Club will make referrals to Social Care and be part of the support system to ensure the wellbeing of the child/children. For further information:

<https://www.gov.uk/government/publications/homelessness-reduction-bill-policy-factsheets>

Honour Based Abuse (HBA)

"Honour-based" abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. The Club will contact relevant agencies as guided by local and national protocols to escalate where there are concerns that a child or young person has been subject to or is at risk of honour based abused.

Honor Based Abuse – 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. Within schools and college settings there is a statutory duty upon teachers to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under the age of 18. For further reading:

<https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

Staff at the Club/Foundation must follow the Club/Foundation safeguarding reporting procedure should they suspect or become aware that an act of FGM has allegedly been carried out on a minor (under 18). The Safeguarding team will provide guidance with reference to reporting to police and other agencies.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf

Honor Based Abuse – Forced Marriage

A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. It is important for staff at the Club/Foundation to know that forcing a person into marriage is a crime in England and Wales.

Should staff become aware that a child is at risk of a forced marriage, they must immediately inform their department Safeguarding Officer who will be best able to make the necessary assessment of the risk and liaise with the appropriate agencies to ensure the safety of the child.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/322307/HMG_MULTI_AGEN_CY_PRACTICE_GUIDELINES_v1_180614_FINAL.pdf

The Forced Marriage Unit – Contact 020 7008 0151 or email fm@fco.gov.uk

Peer on Peer/Child on Child abuse

Children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms. This can include (but is not limited to): abuse within intimate partner relationships; bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiation/hazing type violence and rituals.

Sexual Violence and Sexual Harassment

Sexual Violence

When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003 as described below:

- Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

Definition of consent: Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice. (*Keeping Children Safe in Education 2020*)

Sexual Harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:

- non-consensual sharing of sexual images and videos;
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media;
- sexual exploitation; coercion and threats; and
- upskirting.

Sexting

This can also be referred to as “sending nudes”. Sexting or sending nudes is when someone shares a sexual message, naked or semi-naked image, video or text message with another person. It doesn't have to be a nude image of them and could be an image of someone else. Children/young people can send nudes using phones, tablets and laptops and can share them across any app, site or game, including during a livestream and on social media channels.

Some of the risks of sexting or sending and sharing nudes for children and young people are:

- Losing control of the images, videos or messages and how they're shared. Once something's shared online it's public and can be saved or copied by others.
- Blackmail, bullying and harm. Young people can have their photos, messages or videos shared without their consent or be bullied about them. This can lead to them feeling difficult emotions like distress or embarrassment and shame.

The law says that creating or sharing sexual images or videos of a child under 18 is illegal, even if the person doing it is a child. This includes:

- Sending sexual messages to a child
- A child taking an explicit photo or video of themselves or a friend
- Sharing an explicit image or video of a child, even if it's shared between children of the same age
- having, downloading or storing an explicit image or video of a child, even if the child gave their permission for it to be taken.
- Sharing an explicit image or video of a child is illegal, even if it's shared between children of the same age. Sharenting or adults sharing a photo of a child to raise awareness is also illegal. For further info: <https://www.nspcc.org.uk/keeping-children-safe/online-safety/sexting-sending-nudes/>

Upskirting

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

PREVENT Duty

PREVENT is one of the four elements of “CONTEST”, the government's counter-terrorism strategy.

The four elements are:

- Pursue
- Protect
- Prepare
- Prevent

PREVENT aims to stop people becoming involved in violent extremism. The Prevent Strategy responds to the ideological challenge of terrorism and aspects of extremism, and the threat from

those who promote these views. It provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support.

It works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation.

The PREVENT Duty incorporates the responsibility to promote fundamental British Values through practices and the formal and informal curriculum. British values are defined as;

- Democracy
- The rule of law
- Individual liberty
- Mutual respect and tolerance of those of different faiths and beliefs.

The PREVENT Duty covers all forms of radicalisation, including risk from extremist faith groups, far right extremism and some aspects of non-violent extremism. There are different forms of extremist organisations in the UK and the world, i.e.: ISIL (Islamic State), Al-Qaeda, Boko Haram, British Defence League, Animal Rights extremist groups such as SPEAK, Irish Republican Army (IRA), Anti-Abortion groups, to name a few.

Risk Assessment and Action Plan

The Club will undertake a risk assessment of where and how individuals might be at risk of being drawn into terrorism. The level of risk will vary between activities, geographical location, and profile of participants. The risk assessment will consider information from external sources, such as the regional Prevent Co-ordinator, local authorities and the police. The resulting Prevent Action Plan will mitigate the risks in a proportionate manner. The Club's Prevent Action Plan will be regularly monitored by the Head of Safeguarding & Welfare. Where significant risks are identified, the Head of Safeguarding & Welfare in collaboration with senior managers, will consider what action might mitigate the impact/likelihood of that risk evolving and, where necessary, include it on the Prevent Action Plan.

Training and Awareness

All staff in regulated activity will complete a biannual "Raising Awareness About Prevent" training. Staff must also complete the online PREVENT training (educare) as part of their Club induction.

Reporting Extremist Narratives or Radicalisation Concerns

All staff must remember and take seriously their duty of care to report and escalate concerns using the Club's safeguarding reporting process. Staff must bear in mind that isolated concerns may support building a "picture of need", which can identify the appropriate services to support players/participants who may be at risk of extremist views/radicalisation.

The Head of Safeguarding & Welfare/Safeguarding Officers may seek advice from external contacts, including Local and National Prevent Coordinators, to discuss anonymously cases they may be considering for referral. These agencies will provide the support and guidance regarding decisions to refer a case to CHANNEL. For further reading on Channel

<https://www.gov.uk/government/publications/channel-guidance>

Good Practice Guidance for Staff Working With Children

Standards of Good Practice

All Club/Foundation staff should:

- Treat all children with respect.
- Involve children in decisions that affect them.
- Encourage positive, respectful and safe behaviour among children by setting right examples.
- Listen to the voice (opinions, concerns, etc.) of children.
- Be alert to changes in a child's behaviour and to signs of abuse, exploitation, bullying and neglect.
- Recognise that challenging/disruptive behaviour may be a sign of a **"cry for help"**.
- Read and understand the Club's policies and guidance documents on child protection and safeguarding issues.
- Maintain professional standards of conversation and interaction with and between children and avoid the use of sexualised or derogatory language.
- Be aware that the personal, family circumstances and lifestyles outside of our environment (extra familial harm) of some children can lead to an increased risk of abuse and exploitation.
- Report concerns about a child's safety and welfare.
- Follow the Club's policy with regard to relating and communicating with children, including on social media.
- Consider physical contact as a necessity only in instances where needed to aid or teach a skill or to administer first aid support. (Staff should always ask the child's permission to make physical contact)
- Work in an open environment and within sight or hearing of others (*where the role a staff member has makes this difficult, staff must work with a greater sense of transparency and accountability for their time spent with children, ensuring that accurate records are kept of all 1-2-1 meetings/engagement and approval of line management is sought*)

Position of Trust

Staff are expected to at all times maintain healthy, positive and professional relationships with all children, participants and players. Staff are in a **"Position of Trust"** in relation to all children, participants and players and therefore must not engage in sexual relationships with them. The Club will consider such action **"gross misconduct"**.

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.

Enabling Children to Keep Themselves Safe

Staff will outline and encourage safe behaviours from the children in their care. Children are expected to adhere to the Activity/Department Code of Conduct, and staff must ensure this is communicated at the beginning of and periodically throughout the season.

Working in Partnership – Parents/Carers

Collaboration with parents and carers forms a significant part of our safeguarding approach. Where possible and assessed as safe to do so, staff are expected to:

- Maintain positive communication with parents/carers about the progress of their children
- Share concerns (if safe to do so) with a view to empowering parents/carers to be part of a monitoring or action plan
- Inform parents of any changes in organisation/department procedures that has relevance to child's attendance, performance or achievement
- Periodically remind parents of the expectations of their child, and expectations of parent behaviour.
- Listen to the voice of the parent where they may have concerns for their child's welfare.

Further Reading: Guidance for Safer Working Practice

<https://tottenhamhotspur.unily.com/documents/preview/9691/Guidance-for-Safer-Working-Practice>



Key Contact List

Internal

Title/Role	Name	Contact Details
Operations & Finance Director – Safeguarding Lead Board Representative	Matthew Collecott	020 83655322 matthew.collecott@tottenhamhotspur.com
Head of Safeguarding & Welfare	Dayne Matthieu	07879997839/02083655118 dayne.matthieu@tottenhamhotspur.com
CEO Foundation	Sarah Ebanja	sarah.ebanja@tottenhamhotspur.com
Head of HR – Safer Recruitment	Lisa Beresford – Hines	hr@tottenhamhotspur.com
Safeguarding Manager - Foundation	Sandra Barratt	07384 818062 sandra.barratt@tottenhamhotspur.com
Safeguarding Officer – Foundation	Dan Dodge	07775 861935 daniel.dodge@tottenhamhotspur.com
Safeguarding Officer Global Development	Jason Pedulla	07384 461340 jason.pedulla@tottenhamhotspur.com
Head of Global Coaching	Andy Rogers	andy.rogers@tottenhamhotspur.com
Safeguarding Officer Womens & Girls	Chloe Wakeling	07384 810246 chloe.wakeling@tottenhamhotspur.com
Head of Womens Football	Heather Cowan	heather.cowan@tottenhamhotspur.com
Welfare Officer Girls Football Development	Roz Leacock	07810 861780 rozana.leacock@thwfc.co.uk
Safeguarding Officer – Pre-Development Academy	Nick Hardy	07469 857946 nick.hardy@tottenhamhotspur.com
Safeguarding Officer Academy U7's – U12's	Gary Broadhurst	07825 176866 gary.broadhurst@tottenhamhotspur.com
Safeguarding Officer Academy U12's – U16's	Jack Percival	07469 855000 jack.percival@tottenhamhotspur.com
Safeguarding Officer Academy Scholars	Nick Boulli	07557 652373 nick.boulli@tottenhamhotspur.com
Academy Manager	Dean Rastrick	dean.rastrick@tottenhamhotspur.com
Academy Operations Manager	Luke Godfrey	07825 840732 luke.godfrey@tottenhamhotspur.com
Academy Player Care Manager	Tina Gold	07387 023642 tina.gold@tottenhamhotspur.com
Lead Safety Officer – Match Day/Events	Eileen Williams	eileen.williams@tottenhamhotspur.com

Safeguarding Officer – Match Day/Events	Myrianthos Demetriou	07775 423507 myrianthos.demetriou@tottenhamhotspur.com
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Key Contact List

External

Organisation	Contact details
Haringey Mash (Multi Agency Safeguarding Hub) LADO (local Authority Designated Officer)	The MASH will advise anyone (professionals and members of the public) observing or coming into contact with any concerns about a child. The MASH can be contacted on: Tel: 020 8489 4470. Email: mashreferral@haringey.gov.uk LADO: contact us on 020 8489 2968/1186 or email LADO@haringey.gov.uk
Enfield Mash & LADO	The MASH Team operates Monday to Friday (9am-5pm). If you have an urgent concern after hours you should contact the Enfield Adult Abuse Line: 020 8379 5212. The MASH acts as the first point of contact, receiving all new safeguarding concerns or enquiries. LADO: 0208 379 4392 or email safeguardingservice@enfield.gov.uk .
Waltham Forest Mash & LADO	The MASH team operates Monday to Thursday 9am to 5.15pm and Friday 9am to 5pm Telephone: 020 8496 2310/Out of hours telephone : 020 8496 3000 or email MASHrequests@walthamforwest.gov.uk LADO: Contact: Gill Nash on 020 8496 3646 / 07791 559 789 or email us at lado@walthamforest.gov.uk
Barnet Mash & LADO	The MASH team are available Monday to Thursday 9 am to 5.15 pm and Friday 9 am to 5 pm. For urgent welfare concerns about children or young people that require and immediate response, phone the Multi-Agency Safeguarding Hub (MASH) on 020 8359 4066/out of hours - 020 8359 2000 . PS - Barnet's LADO should be contacted via the Multi Agency Safeguarding Hub (MASH) Team .
Haringey PREVENT	Call 020 8489 3884 or 020 8489 1280 (office hours only). Email: prevent@haringey.gov.uk . Karina Kaur – Strategic Lead of communities - 07976953191
Enfield PREVENT	Email prevent@enfield.gov.uk or email: Sujeevan.Ponnampalam@enfield.gov.uk
Camhs – Haringey (Child & Adolescent Mental Health Service)	For advice and queries on referrals, contact Haringey CAMHS ACCESS 020 8702 3400/3401. Mental Health crisis helpline: 0800 151 0023 - call this number to get support or advice 24/7.
Camhs – Enfield	Enfield CAMHS: 020 8702 4070. Mental Health crisis helpline: 0800 151 0023 - call this number to get support or advice 24/7.
Camhs – Waltham Forest	Contact 0300 5551247 or email walthamforest@camhs@nhs.net
Camhs – Barnet	Contact Barnet CAMHS: 020 8702 4500. Mental Health crisis helpline: 0800 151 0023 - call this number to get support or advice 24/7.
Premier League Safeguarding team	Jess Addicot (Head of Safeguarding): 07917 204890 or email jaddicot@premierleague.com or safeguarding@premierleague.com

FA	David Gregson (Safeguarding Investigations Manager): 0800 1691863 ext 6838. david.gregson@TheFA.com
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