

CLUB SAFEGUARDING POLICY  
CREATING A SAFE ENVIRONMENT FOR EVERYONE



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Senior Safeguarding Manager, Bob Symns

Club Welfare Officer, Liz Elsom

Peterborough United Board of Directors

**Written By:**

Academy Safeguarding & Player Care Manager, K Stent.

A handwritten signature in black ink that reads 'Bob Symns'.

Bob Symns

A handwritten signature in black ink that reads 'Liz Elsom'.

Liz Elsom

A handwritten signature in black ink that reads 'Kayleigh Stent'.

Kayleigh Stent

Darragh MacAnthony (on behalf of the board)

**CLUB SAFEGUARDING POLICY**  
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**Appendices;**

1. Abuse Policy
2. Accommodation Policy
3. Allegations against Policy
4. Anti-Bullying Policy
5. Complaints Policy
6. Data Protection Policy
7. Equality Policy
8. Fury Mascot Policy
9. Information Communication Technology (ICT) Policy
10. Missing Persons / Late Collection Policy (including Match days)
11. Prevent Policy
12. Safer Recruitment Policy
13. Social Media Guidance for young people and vulnerable adults Policy
14. Social Media Guidance for staff Policy
15. Transport Policy
16. Whistle Blowing Policy
17. Risk Management Policy
18. Mental Health Policy

# CLUB SAFEGUARDING POLICY

## CREATING A SAFE ENVIRONMENT FOR EVERYONE



### Terminology and Definitions;

#### *Peterborough United Football Club Ltd;*

- (the club, the football club, PUFC) – This is Peterborough United Football Limited, its workforce, and its activities.

#### *Peterborough United Foundation;*

- (PUF) – This the community department which branch off from the Football Club to make up PUFC, its workforce, and its activities.

#### *Activity;*

- Any match, coaching/training session or activity and or event where the club is responsible for the welfare of all individuals taking part.

#### *Workforce;*

- Refers to any person, employed or deployed, by club to work on a paid or voluntary capacity in a club activity. Such individuals may be full, or part-time, permanent or fixed term staff employed directly by the football club. They may be deployed by the club on a temporary or casual basis, they may be volunteers deployed by club management, they may be deployed via a third-party contractor.

#### *Child;*

- The term 'Child' is defined in the Children Act of 1989 as any person under the age of 18. (Legislation, Online)

#### *Vulnerable Adult;*

- Is a person aged 18 years or over who is, or may be in need of community care services by reason of mental or other disability, age or illness; and who is or maybe unable to take care of themselves, or unable to protect themselves against significant harm or exploitation.

#### *Harm;*

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

#### *Parent;*

- This is when a Parent has responsibility of the child/ children and consent is required in respect of a child taking part in Club related activities or reporting a concern. We will take all reasonable steps to identify the person(s) with legal PR (parental responsibility) for the child/ children. Where identifying PR is complex or disputed (not all parents have PR and not all people with PR are parents) we will seek consent from the biological parent or adoptive parent unless we are otherwise instructed.

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*Weston Homes Stadium;*

- This is the primary venue for the Football Club:  
Weston Homes Stadium, London Road, Peterborough, Cambridgeshire, PE2 8AL

*Training Ground;*

- This is the main venue for all Academy training, games and education and first team training. (iTG)  
idverde Training Ground, Oundle Road, Peterborough, Cambridgeshire, PE2 7EA

*SSM;*

- Senior Safeguarding Manager

*CWO;*

- Club Welfare Officer

*APCM;*

- Academy Safeguarding and Player Care Manager

*DSO;*

- Designated Safeguarding Officer

*LADO;*

- Local Authority Designated Officer

*LFE;*

- League Football Education

*EFL;*

- English Football Club

*The FA;*

- The Football Association

*LFE;*

- League Football Education

*PL;*

- The Premier League

*NSPCC;*

- National Society for the Prevention of Cruelty to Children

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### Our Club Safeguarding Aims;

Peterborough United Football Club Limited, and Peterborough United Foundation, together acknowledges the duty of care to safeguard and promote the welfare of children, young people and vulnerable adults and its staff.

The club has both a moral and legal obligation to ensure a duty of care for children, young people and vulnerable adults and its staff throughout the football club.

As a club we are committed to ensuring that all children and vulnerable adults are protected and kept safe from harm whilst engaged in any services organised and provided by the club.

The football club is committed to ensuring safeguarding practice reflects statutory responsibilities, government guidance and complies with best practice and local authority requirements.

This policy recognises that the welfare and interests of children and vulnerable adults are paramount in all circumstances. It aims to ensure that regardless of age, gender, religion or beliefs, ethnicity, disability, sexual orientation or socio-economic background, all children, young people and vulnerable adults have a positive and enjoyable experience with all their activities given by the football club. We are committed to ensuring that these activities will be in a safe environment, where children, young people and vulnerable adults are protected from abuse whilst under our care.

Peterborough United Football Club acknowledges that some children (and adults), including those with a disability or those from ethnic minority communities, can be particularly vulnerable to abuse and we accept the responsibility to take reasonable and appropriate steps to ensure their welfare.

We aim to create a safe and welcoming environment for all children, young people and vulnerable adults and its staff involved in any of our club activities, free from abuse and fear of abuse in all its forms.

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

A clear system which promotes and supports;

- Constant vigilance
- Prevention and early intervention in all safeguarding matters
- Where necessary, prompt and thorough action in response to any concerns or incidents.
- To implement legislation, Government policy and Premier League and FA regulations, policy and guidance where necessary to comply with the law at all times, and
- To work closely together with parents, local statutory agencies and other partners to promote and safeguard the welfare of children and vulnerable adults.

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In order to realise these aims we will;

- Work with relevant governing bodies and statutory agencies to ensure we meet all necessary regulations in respect of our safeguarding practice. We will adopt the standards presented in the government's statutory guidance documents 'Working Together to Safeguard Children', (Government, Online) 'No Secrets' (Government, Online) and 'Keeping Children Safe in Education' (Government, Online)
- Listen to children, young people and vulnerable adults, take them seriously, and react swiftly and appropriately to ideas, feelings and concerns and address them in a fair, effective and timely manner.
- Develop and communicate a series of clear policies, protocols and guidance designed to help deliver good practice across the club.
- Maintain a visible presence across all areas of the club including club internet platforms
- Created an effective support network of designated safeguarding officers across the club.
- Provide an advisory and support mechanism across all areas of the business where children and vulnerable adults are involved in any club-led activity.
- Follow the club's 'Safer Recruitment' policy.
- Develop a consistent and appropriate safeguarding training programme for staff, volunteers, partners and participants.
- Maintain confidentiality of all information and documentation relating to DBS disclosures, concerns, allegations and incidents in accordance with the Data Protection Act. (Government, Online) Ensure that child protection records are reviewed regularly to check whether any action or updating is needed. This includes monitoring patterns of complaints or concerns about any individuals and ensuring that these are acted upon.
- Ensure that the players are unable to access terrorist and extremist materials through the internet within the organisation. Ensuring that suitable internet filtering is in place and that the players are taught about online safety from a general perspective.
- Ensure that all staff are aware that they have an individual responsibility to pass on safeguarding concerns.

This policy and club procedures will be widely promoted amongst staff and are mandatory for anyone whose role involves working with children, young people and vulnerable adults at Peterborough United Football Club. Failure to comply with club policies and procedures will be addressed without delay and may ultimately result in dismissal/exclusion from the club.

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### Principles;

This policy and other supporting policy and procedures are based on the following principles;

- The welfare of children, young people and vulnerable adults is the primary concern
- All children, young people and vulnerable adults irrespective of their age, culture, disability, gender, language, racial origin, socio-economic status, religious belief and/ or sexual orientation have the right to protection from abuse and harm
- It is everyone's responsibility to report any concerns or nagging doubts about abuse in order that prompt action is to be taken if required
- All incidents of alleged poor practice, misconduct and abuse will be taken seriously and responded to swiftly and appropriately through the process of 'My Concern'
- All personal data will be processed in accordance with the requirements of the Data Protection Act May 2018. (GDPR) General Data Protection Regulation and any relevant privacy policy issued by the Club. All data will be kept in line with the Clubs Retention policy.

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**Monitoring;**

The policy will be reviewed a year after development and then every year after, or in the following circumstances;

- Changes in legislation and/or government guidance
- As required by the Local Safeguarding Children Boards
- As a result of any other significant change or event



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### Who will we work tirelessly to keep safe;

To illustrate the scope of this, work the list below provides several examples or situations across the club where we need to consider the welfare of people in our care;

- Players involved in the academy and associated development programmes
- Under 18 players who are part of the senior squad
- Children, young people and vulnerable adults taking part in community activities
- Disabled supporters and other vulnerable adults contacting the club, visiting the stadium on match days, or visiting for other pre-arranged activities (e.g. stadium tours)
- Children and young players on tour or living for significant time away from home in club-arranged accommodation
- Children (including very young children) visiting the stadium for matches, events or tours
- Ball boys, match-day mascots and flag-bearers
- Match day staff
- Work experience staff
- Support to those who may be vulnerable to bullying or cyberbullying through their relationship with the club
- Disabled children and disabled adults taking part in any Peterborough United organised activity

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#### **Age Sensitivity;**

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

#### **Additional Vulnerability;**

'Children' are usually easy to identify.

Additional vulnerability is not as easy.

Adults with additional vulnerability are often even more difficult to identify and plan for. It is a priority of the clubs to safeguard the welfare of both children, young people and adults with additional vulnerability when in our care.

#### **Language & Communication;**

Football is a multi-cultural, global sport.

Some people taking part in our activities may not use English as their first language or may experience difficulty communicating with club staff in the usual ways. As a principle we will always be patient and try to communicate in an individual's chosen way and where necessary we will use an interpreter (i.e. foreign language) or communicator (e.g. British Sign Language).

#### **Children from Overseas;**

Occasionally the club will encounter children who do not live in this country.

This policy applies equally to them. We will also ensure that where this situation does arise that international law and football regulations are applied as well as the needs of the child being put first. Where we have a concern that a child may be being exploited or 'trafficked' the appropriate authorities will be informed.

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### **Recruitment, Induction, training and qualifications;**

All staff recruitment is conducted in an open and transparent manner to ensure that Peterborough United Football Club has the best staff. Refer to our club safer recruitment policy.

Successful candidates are also subject to reference checks, which ask previous employers of their opinion as to whether the candidate is suitable to work with children and vulnerable adults, if the role requires it.

The employment of all Peterborough United Football Club staff, (where the role requires it) are subject to individuals having a relevant and up to date safeguarding qualification and enhanced DBS checks. The standard recognised welfare qualification for Peterborough United Football Club is the FA Safeguarding Children and FA Welfare Officer for those who are employed as DSOs.

The FA safeguarding qualification is valid for a period of three years from the date it is attained, and all staff are required to maintain their safeguarding qualification throughout their employment to ensure that it remains up to date and valid. The FA Welfare Officers course is done once by DSOs but extra training either through the FA, EFL, LFE or externally and the continuous FA Safeguarding training will be needed.

As part of the induction process for every member of staff (and volunteers), will be issued with a copy of this safeguarding policy and a member of the safeguarding team will be around should staff (and volunteers) wish to discuss anything. This allows all staff (and volunteers) to understand theirs, and the club's responsibilities in running of our activities in a controlled and safe environment for all participants involved.

Staff (and volunteers) will also undertake mandatory in-house training and development on all aspects of safeguarding and welfare, to ensure that it remains continuously at the top of the agenda for all staff (and volunteers)

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#### **Disclosure and Barring Service Checks;**

All staff and volunteers who are working with young people and vulnerable adults, are subject to an enhanced DBS check, which will be undertaken through the criminal record bureau service, with the process further outlined in the club's self-declaration form and criminal records policy. This will be led by the Club Welfare Officer or Academy Safeguarding and Player Care Manager.

The club undertakes not to discriminate unfairly against any subject of a criminal records check or self- disclosure based on a conviction or other information revealed.

Having a criminal record will not necessarily bar individuals from working or volunteering with the club and any record will be considered as part of a risk assessment process as outlined in the Safer Recruitment policy and Volunteering policy. that ensures suitability for the post in question.

The decision on suitability will depend on the nature of the position and the circumstances and background of the offences, cautions and other criminal intelligence.

The Criminal Record Bureau confirms that all criminal record data will be processed on behalf of Peterborough United Football Club in accordance with the provisions of the Data Protection Act 2018 and the Disclosure and Barring Service code of practice.

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**Trustees;**

Ultimately, responsibilities for safeguarding and welfare within Peterborough United Foundation, lies solely with the trustees of the Foundation.

The role of the trustee in the foundation is not to oversee the day to day management of the safeguarding and welfare controls, but to take leadership responsibility for the foundation's safeguarding policies and procedures.

The day to day management of safeguarding controls is designated to the managers and safeguarding team within the foundation.

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**Safeguarding and the Club's workforce**

Safeguarding is also about ensuring that all Peterborough United staff (and volunteers) understand the wider role that they play in protecting vulnerable people.

This means all members of the workforce involved in training, managing, supervising or caring for children or vulnerable adults, in particular:

- Managers and assistants
- Office staff
- Football scouts
- Medical staff
- Stewards
- Drivers
- Accommodation providers
- Hospitality
- Private tutors
- Players
- Partners, licence holders and their staff

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

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### **Safeguarding**

Safeguarding is the action that is taken to promote the welfare and human rights of individuals especially children, young people and vulnerable adults to live free from abuse, harm and neglect.

### **Positions of Trust**

As a result of the roles and authority that many members of the club hold, they are in positions of trust in relation to those in their care. This means that they are in a position of power and influence over children, young people or vulnerable adults who take part in any club activities and as such have the potential to abuse that position of trust. Staff must not abuse their position for personal advantage or gratification or that of others.

### **Standards of Behaviour**

The club will adopt the highest standards of behaviour at all times in order to maintain the confidence and respect of children, young people, vulnerable adults, parents, customers, supporters and colleagues. Within the capacity of their duties their actions should always be reasonable, appropriate, warranted, proportionate, safe and applied equitably.

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### Training

The clubs safeguarding team will receive training across most areas of the safeguarding landscape, such as:

- Good practice
- E-safety
- Disability
- Neglect
- Domestic violence
- Gang culture
- Substance misuse
- Prevent
- Exploitation
- Radicalisation

Peterborough United staff also receive several training sessions from outside organisations such as NSPCC, Cambridgeshire and Peterborough Police and Peterborough City Council.

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



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### Types of Abuse

Abuse can happen on any occasion or in any place where children, young people or vulnerable adults are present. Abuse is any form of physical, emotional or sexual mistreatment or lack of care leads to injury or harm of the child, young person or vulnerable adult. It commonly occurs within a relationship of trust or responsibility and represents an abuse of power or breach of trust. Abuse can happen to an individual regardless of their age, gender, race or ability.

Someone may abuse or neglect an individual by inflicting harm, or by failing to act to prevent harm. People may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by a stranger. People can be abused by adults either male or female, or children.

Any allegations or suspicions of abuse, poor practice or bullying need to be responded to and reported in line with the clubs reporting procedures.

There are four main types of abuse:

- Neglect
- Physical abuse
- Sexual abuse
- Sexual abuse and emotional abuse

Children, young people and vulnerable adults can also be harmed through poor practices and bullying within activity settings.

### Neglect

This is when adults consistently or repeatedly fail to meet an individual's basic physical and/or psychological needs which could result in the serious impairment of the individual's health or development e.g. failure to provide adequate food, shelter and clothing; failing to protect someone from physical harm or danger; or the failure to ensure access to appropriate medical care or treatment. It may also include refusal to give love, affection and attention.

Neglect in sport or physical activity could include a coach or other member of staff repeatedly failing to ensure people are safe, exposing them to undue cold, heat or extreme weather conditions without ensuring adequate clothing or hydration; exposing them to unnecessary risk of injury e.g. by ignoring safe practice guidelines, failing to ensure the use of safety equipment, or by requiring young people to participate when injured or unwell.

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Examples	Signs Include
<ul style="list-style-type: none"><li>• Withholding help or support necessary to carry out daily living tasks</li><li>• Ignoring medical and physical care needs</li><li>• Failing to provide access to health, social or educational support</li><li>• The withholding of medication, nutrition and heating</li><li>• Keeping someone in isolation</li><li>• Failure to intervene in situations that are dangerous to the vulnerable person. Inadequate supervision and guidance, leaving the child to cope alone. Abandoning them or leaving them with inappropriate carers. And failing to provide appropriate boundaries about behaviours such as underage sex or alcohol.</li></ul>	<ul style="list-style-type: none"><li>• Constant hunger, sometimes stealing food from others</li><li>• Dirty or 'smelly'</li><li>• Loss of weight, or being constantly</li><li>• Underweight</li><li>• Inappropriate dress for the weather</li><li>• Complaining of being tired all the time</li><li>• Having few friends</li><li>• Worsening of health conditions</li><li>• Mentioning their being left alone or unsupervised</li><li>• Sore or extreme nappy rash</li><li>• Skin infections</li><li>• Lack of response to stimuli or contact</li><li>• Poor skin condition(s)</li><li>• Anxiety</li><li>• Distressed</li><li>• Child moves away from parent under stress</li><li>• Little or no distress when separated from primary carer</li><li>• Inappropriate emotional responses</li><li>• Language delay</li></ul>

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**Physical Abuse**

When someone physically hurts or injures another person by hitting, shaking, throwing, poisoning, burning, biting, scalding, suffocating, drowning or otherwise causing harm. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to someone they are looking after.

Physical abuse in sport or physical activity may be when the nature and intensity of training or competition exceeds the capacity of the child's immature and growing body; where coaches encourage the use of drugs or harmful substances to enhance performance or delay puberty; if athletes are required to participate when injured; or when sanctions used by coaches imposed involve inflicting pain.

Example	Signs include
<ul style="list-style-type: none"> <li>• Shaking</li> <li>• Pinching</li> <li>• Slapping</li> <li>• Force-feeding</li> <li>• Biting</li> <li>• Burning or Scalding</li> <li>• Causing needless physical</li> <li>• Discomfort Inappropriate restraint</li> <li>• Locking someone in a room</li> </ul>	<ul style="list-style-type: none"> <li>• Unexplained bruising, marks or injuries on any part of the body</li> <li>• Frequent visits to the GP or A&amp;E</li> <li>• An injury inconsistent with the explanation offered</li> <li>• Fear of parents or carers being approached for an explanation</li> <li>• Aggressive behaviour or severe temper outbursts</li> <li>• Flinching when approached</li> <li>• Reluctance to get changed or wearing long sleeves in hot weather</li> <li>• Depression</li> <li>• Withdrawn behaviour or other behavioural change</li> <li>• Running away from home/residential care</li> <li>• Distrust of adults, particularly those with whom a close relationship would normally be expected.</li> </ul>

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### Sexual Abuse

This is where children, young people or vulnerable adults are abused by adults (both male and female) or other children who use them to meet their own sexual needs. This could include full sexual intercourse, masturbation, oral sex, anal intercourse, kissing and sexual fondling. Showing individuals pornographic material (books, videos, pictures) or taking pornographic images of them are also forms of sexual abuse.

In sport or physical activity, coaching techniques which involve physical contact with others can create situations where sexual abuse can be disguised and may therefore go unnoticed. The power and authority of, or dependence on, the coach if misused, may also lead to abusive situations developing. Contacts made within sport and pursued e.g. through texts, Facebook or Twitter have been used to groom children for abuse.

Example	Signs include
<ul style="list-style-type: none"><li>• Rape and other sexual offences</li><li>• For vulnerable adults, sexual activity including sexual contact and non-sexual contact that the person does not want, to which they have not consented, could not consent, or were pressured into consenting to.</li><li>• Being encouraged or enticed to touch the abuser</li><li>• Coercing the victim into watching or participating in pornographic videos, photographs, or internet images</li><li>• Any sexual relationship that develops where one is in a position of trust, power or authority</li></ul>	<ul style="list-style-type: none"><li>• Pain or itching in the genital/anal areas</li><li>• Bruising or bleeding near genital/anal areas</li><li>• Sexually transmitted disease</li><li>• Vaginal discharge or infection</li><li>• Stomach pains</li><li>• Discomfort when walking or sitting down</li><li>• Pregnancy</li><li>• Sudden or unexplained changes in behaviour, e.g. becoming aggressive or withdrawn</li><li>• Fear of being left with a specific person or group of people</li><li>• Nightmares</li><li>• Leaving home</li><li>• Sexual knowledge which is beyond their age or development age</li><li>• Sexual drawings or language</li><li>• Bedwetting</li><li>• Saying they have secrets they cannot tell anyone about</li><li>• Self-harm or mutilation, sometimes leading to suicide attempts</li><li>• Eating problems such as overeating or anorexia</li></ul>

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### Emotional Abuse

Emotional abuse is the persistent emotional ill-treatment of an individual so as to cause severe and persistent adverse effects on the person's emotional development. It may involve conveying to people 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 someone or even the over protection of an individual. It may involve causing people to feel frightened or in danger by being constantly shouted at, threatened or taunted which may make the person very nervous and withdrawn. Some level of emotional abuse is involved in all types of ill-treatment of a child, young person or vulnerable adult.

Emotional abuse in sport or physical activity may occur if people are subjected to constant criticism, name-calling, sarcasm, bullying, racism or pressure to perform to unrealistically high expectations; or when their value or worth is dependent on sporting success or achievement.

<b>Examples</b>	<b>Signs include</b>
<ul style="list-style-type: none"><li>• Intimidation and/or threats</li><li>• Bullying</li><li>• Rejection</li><li>• Shouting</li><li>• Indifference and the withdrawal of approval</li><li>• Denial of choice</li><li>• Deprivation of dignity or privacy</li><li>• The denial of human and civil rights</li><li>• Harassment</li><li>• Being made to fear for one's well being</li></ul>	<ul style="list-style-type: none"><li>• A failure to thrive or grow</li><li>• Sudden speech disorders</li><li>• Developmental delay, either in terms of physical or emotional progress</li><li>• Behaviour change</li><li>• Being unable to play or socialise with others</li><li>• Fear of making mistakes</li><li>• Self-harm</li><li>• Fear of parent or carer being approached regarding their behaviour</li><li>• Confusion</li></ul>

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### **Additional Welfare Considerations**

Poor practice is the type of behaviour of an individual in a position of responsibility which falls below the Clubs required standard. Poor practice may not be immediately dangerous or intentionally harmful to an individual, however is likely to set a poor example.

Poor practice is potentially damaging to the individual, the club and to those who experience it. For example, leading a group with alcohol on the breath, smoking, swearing in front of others, or not paying due care and attention to participants all constitute poor practice.

Poor practice can sometimes lead to, or create, an environment conducive to more serious abuse. It may also lead to suspicions about the individual's motivation, even where no harm is intended. For example, if a member of staff is giving one child too much attention, regularly transports children in their car, or encourages physical contact with children without obvious justification.

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**Anti -Bullying**

Bullying by peers can occur whenever children and young people come together. Bullying can take many forms and is harmful to its victim. It may be physical e.g. hitting; online or cyber e.g. abusive messages, comments or images on social media; involve damage or theft of property; based on someone's gender, ethnicity, sexuality or disability; or about their physical ability.

More detail on recognising and managing instances of bullying can be found in the Peterborough United Anti-Bullying policy.

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**Increased Risk to Vulnerable Children**

There are many issues that may contribute to child abuse, but some factors increase the risk to children and make them more vulnerable to abuse. They can be found in the background of parents, in the environmental situation and in attributes of the child themselves.

**Parental factors:**

- Parent has a mental illness
- Parent is abusing drugs or alcohol
- Parent has already abused a child
- Pregnancy was not wanted
- Parent has a background of abuse when growing up
- Young, unsupported mother often with low education
- Parents have unrealistic expectations of the child and lack parenting knowledge
- Parent is isolated and has little support
- Parent has a learning difficulty

**Environmental factors:**

- Overcrowding in the house
- Poverty or lack of opportunity to improve the family's resources
- Domestic violence is present
- A non-biological adult (i.e. unrelated) living in the house
- Family is experiencing multiple stress

**Additional Risks to children.**

- Child Sexual Exploitation
- Child criminal exploitation
- Peer on peer
- Grooming
- Radicalisation
- Female genital mutilation (FGM)
- Cyberbullying
- Hazing
- Infatuations
- Domestic violence



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#### Additional Risks to Vulnerable Adults

With vulnerable adults being classed as 18+, there are additional risks relating to financial, legal and discriminatory matter

FINANCIAL ABUSE (Vulnerable Adults)	
Examples include	Signs include
<ul style="list-style-type: none"> <li>• Being over charged for services</li> <li>• Being tricked into receiving goods or services that they do not want or need</li> <li>• Inappropriate use, exploitation, or misappropriation of property and/or utilities</li> <li>• Theft</li> <li>• Deception</li> <li>• Fraud</li> <li>• Exploitation or pressure in connection with wills</li> </ul>	<ul style="list-style-type: none"> <li>• Lack of basic requirements e.g. food, clothes, shelter</li> <li>• Inability to pay bills.</li> <li>• Unexplained withdrawals from accounts.</li> <li>• Inconsistency between standard of living and income</li> <li>• Reluctance to take up assistance which is needed</li> <li>• Unusual interest by family and other people in the person's assets</li> <li>• Recent changes in deeds</li> <li>• Power of Attorney obtained when person lacks capacity to make the decision</li> </ul>
DISCRIMINATORY	
Examples	Signs
<ul style="list-style-type: none"> <li>• Use of inappropriate "nick names"</li> <li>• Use derogatory language or terminology</li> <li>• Enforcing rules or procedures which undermine the individual's well being</li> <li>• Denial to follow one's religion</li> <li>• Lack of appropriate food</li> <li>• Denial of opportunity to develop relationships</li> <li>• Denial of health care</li> <li>• Coercive control</li> <li>• Modern slavery</li> <li>• Organisational</li> <li>• Neglects/acts of omission</li> </ul>	<ul style="list-style-type: none"> <li>• Being treated unequally from other users in terms of the provision of care, treatment or services</li> <li>• Being isolated</li> <li>• Derogatory language and attitude by carers</li> <li>• Dismissive language by staff</li> <li>• Hate campaigns by neighbours or others</li> <li>• Deteriorating health</li> <li>• Indicators of other forms of abuse</li> </ul>

**CLUB SAFEGUARDING POLICY**  
**CREATING A SAFE ENVIRONMENT FOR EVERYONE**



**Consent**

The club recognises the need to approach the individual needs of children and vulnerable adults in the appropriate way and according to the law and statutory guidance. Where a child is at risk of harm, consent to act on concerns is not required, although consent from, and consultation with, those with Parental Responsibility is considered good practice by the club unless this would put the child at greater risk of harm.

**'Consent' – Vulnerable Adults**

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

**'Best Interests' – Vulnerable Adults**

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

# CLUB SAFEGUARDING POLICY

## CREATING A SAFE ENVIRONMENT FOR EVERYONE



Reporting concerns;

### Alerters

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

### Whistleblowing

Peterborough United Football Club views the reporting of concerns by members of the workforce as a vital element of maintaining its core values. Individuals are strongly encouraged to report incidents to the DSO/CWO where malpractice of the law, club policy or protocol has been breached by another member, or members, of the workforce. Failure to do so may result in disciplinary or criminal action. Please see whistleblowing policy for more information.

**CLUB SAFEGUARDING POLICY**  
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**Record Keeping & Confidentiality**

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

# CLUB SAFEGUARDING POLICY

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### **Criminal Investigations & Social Care Services**

Where serious concerns are raised and/or a criminal offence may have been committed then it is not the responsibility of club staff to determine if abuse has taken place. This is the responsibility of the police and/or local authority who may involve club staff in any investigation procedures. Where the police decide that they will not take any further action then the local authority may still proceed with an investigation in conjunction with the club. Where both the police and social care services have decided to take no further action then the club management may undertake an internal investigation in accordance with club disciplinary procedures.

### **Local Authority Designated Officer (LADO)**

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

### **ISA Referrals**

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

### **Safeguarding Code of Conduct for Staff and Volunteers**

Peterborough United Football Club staff and volunteers involved have a great opportunity to be a positive role model and help build an individual's confidence, whether a child, young person or vulnerable adult.

## CLUB SAFEGUARDING POLICY

### CREATING A SAFE ENVIRONMENT FOR EVERYONE



#### Staff and volunteers are expected to:

- Ensure the safety of all children, young people and vulnerable adults by providing effective supervision, proper pre-planning of sessions, using safe methods at all times
- Consider the wellbeing and safety of participants before the development of performance
- Encourage and guide participants to accept responsibility for their own performance and behaviour
- Treat all people fairly and ensure they feel valued. Have no favourites
- Encourage all children, young people and vulnerable adults not to discriminate on the grounds of religious beliefs, race, gender, social classes or lack of ability
- Not allow any rough or dangerous play, bullying, or the use of bad language or inappropriate behaviour
- Be positive, approachable and always offer praise to promote the objectives of the club
- Not let any allegations of abuse of any kind or poor practice to go unchallenged or unrecorded
- Incidents and accidents to be recorded in the line with the club's procedures
- Never use sanctions that humiliate or harm participants
- Report accidents or incidents of alleged abuse or poor practice to the designated person
- Administer minor first aid in the presence of others and where required
- Have access to telephone for immediate contact to emergency services if required
- Foster team work to ensure the safety of children, young people and vulnerable adults in their care
- Ensure the rights and responsibilities of children, young people and vulnerable adults are enforced
- Establish and address the additional needs of disabled participants or other vulnerable groups
- Not abuse members physically, emotionally or sexually
- Not engage in a sexual relationship with a child, young person or vulnerable adult for whom they are responsible
- Maintain confidentiality about sensitive information
- Respect and listen to the opinions of children, young people and vulnerable adults
- Develop an appropriate working relationship with participants, based on mutual trust and respect

## CLUB SAFEGUARDING POLICY

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- Be a role model, displaying consistently high standard of behaviour and appearance (disciplined/committed/time keeping), remember people learn by example
- Refrain from smoking and consumption of alcohol during activities or sessions
- Never condone rule violations, rough play or the use of prohibited substances
- Not spending excessive amounts of time alone with children, young people or vulnerable adults unless there are exceptional circumstances
- Never taking a child, young person or vulnerable adult to their home or travel alone with them
- Not administering First Aid involving the removing of an individual's clothing unless in the presence of others
- Hold appropriate valid qualifications and insurance cover
- Make activity fun
- Always adhere to the Clubs Player Announcement and Confidentiality Social Media policy.

#### **Staff and volunteers have the right to:**

- Access on-going training and information on all aspects of leading/managing activities for young people and vulnerable adults, particularly on safeguarding
- Support in the reporting of suspected abuse or poor practice
- Access to professional support services
- Fair and equitable treatment by the club
- Be protected from abuse by children, young people, other adults and parents
- Not to be left vulnerable when working with children or vulnerable adults
- 

Any minor misdemeanours and general misbehaviour will be dealt with immediately and reported verbally to the CWO or APCM and Welfare. Serious or persistent breach of the code will result in disciplinary action and could lead to dismissal from the Club. Refer to the Clubs Whistleblowing policy and Grievance and Disciplinary policies

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### Management of safeguarding cases

The NSPCC Child Protection in Sport Unit (CPSU) assist sports to the clubs to achieve an agreed set of standards which provide frameworks for safeguarding the welfare of children and young people involved in sport. The same principles and standards will also be adopted by Peterborough United Football Club for safeguarding vulnerable adults.

A key requirement of the standards is for sports the clubs to have procedures and systems in place to effectively manage complaints and concerns about the welfare of children, young people and vulnerable adults. These are collectively referred to as the case management process.

### General principles of case management

1. Where, in a sport context, any issue arises in relation to child protection and safeguarding, the welfare of children, young people and or vulnerable adults shall be the paramount consideration
2. Any investigation or inquiry is to proceed upon the basis that the primary consideration will be a determination of the risk posed to children, young people or vulnerable adults
3. Unless the determination finds no, or an insignificant, risk, effective steps must be taken to manage or reduce the risk
4. Individuals about whom there are concerns should be treated fairly and honestly and should be provided with support throughout the process

### Investigation

5. Every investigation or inquiry must be sensitive to the welfare of the children, young people or vulnerable adult during its processes and, at all times, hold central the need to keep the interests of those directly involved as paramount
6. Where issues other than risk to children, young people or vulnerable adults are under consideration in any investigation or inquiry, such issues must remain subordinate to the requirement to determine the risk posed to children, young people or vulnerable adults

### MyConcern

All safeguarding and well-being concern are logged on the players file to MyConcern. This case will remain open, if the case has not had a file note added or any amendments for a period of 7 months the case will be closed and file on the system. This case can be reopened at any point. All cases remain on the system for 7 years after the players contract end date.



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### Risk assessment

7. The assessment of risk involves consideration of the actual or potential harm that an individual pose to a child, young person or vulnerable adult
8. The assessment of risk does not involve making a finding based upon either the criminal or civil standards of proof (i.e. certainty or “the balance of probabilities”). The assessment requires a defensible decision that a risk does or does not exist and, where it does, a determination of the extent of such risk
9. Save in exceptional cases, the assessment will not require the production of a formal risk assessment report

### Risk management

10. The steps taken to address any perceived risk to children, young people or vulnerable adult must have regard to the nature and extent of the risk as well as to any particular and relevant aspects of the activity in question and, in the light of this, must seek to ensure that such steps will be effective
11. In cases where the perceived risk is low, and no criminal or disciplinary charge could be made out, it may be nonetheless necessary to impose stringent restrictions on an individual or remove his/her ability to participate in the activity in question

### Responding to a Disclosure

If a child, young person or vulnerable adult informs a member of staff directly or a member of staff identifies that they are concerned about someone’s behaviour towards them, this is known as disclosure. This disclosure may be relating to an incident or incidents either during the Peterborough United Football Club activity, or outside of the activity environment. The person receiving the disclosure should:

- React calmly so that you do not alarm or frighten the individual
- Tell the individual that he or she is not to blame and that they were right to share their concerns
- Take what the individual says seriously – make key notes
- If the individual needs immediate medical treatment, take them to hospital (if two members of staff are present) or telephone for an ambulance, inform doctors of concern and ensure they are aware that is a child protection issue (as outlined in the referral procedure diagram)
- Ensure the immediate safety of the individual in question
- Avoid leading the individual in questioning and keep any questions to the absolute minimum. Ask only what is necessary to ensure a clear understanding of what has been said

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- Re-assure the individual
- Do not make any promises to the individual (never inform them you will not tell anyone)
- In the event of suspicion of sexual abuse do not let the child bath or shower until given permission to do so. Washing can destroy evidence
- Inform parents/carers immediately unless there is a specific reason not to e.g. the individual has named the parent/carer as the abuser. If this is the case, then contact a member of the Club's safeguarding team. If they are unavailable, staff should contact local Social Services or the Police for guidance
- The judgment about whether an incident is one of abuse or poor practice may not be able to be made at the point of referral, but only after the collection of relevant information by someone appropriately trained and skilled
- Make a full written record of what was said, seen and heard as soon as you can. (using the My Concern website, this links through to the SSM, CWO and APCM to take over and deal with)

### In the event of a disclosure, staff should not:

- Dismiss the concern
- Panic
- Allow your shock or distaste to show
- Probe for more information than is offered
- Speculate or make assumptions
- Make negative comments about the alleged abuser
- Make promises or agree to keep secrets
- Ask the child, young person, vulnerable adult or any witnesses to sign your written information as this may be significantly detrimental to any subsequent police investigation

Do not take photographs of any alleged injuries. Any such recording must only be done by an approved medical or other practitioner, following referral.

### Other Disclosures

There may be instances where a fellow member of staff, friend or carer of a child, young person or vulnerable adult may disclose a concern about the welfare of a young person.

In this instance the same protocol should be followed regarding reporting procedures, and it should be made clear on the referral form by whom the disclosure was made.

# CLUB SAFEGUARDING POLICY

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This safeguarding policy should be made available for all key stakeholders upon request, to ensure individuals and the Clubs are aware of the Peterborough United Football Club reporting procedure for safeguarding concerns.

### Reporting Procedures

All allegations or suspicions and concerns are to be treated seriously. No abuse is acceptable. Some safeguarding concerns may indicate the commission of a criminal offence and must be reported to the Police as soon as possible.

It is the responsibility of the individual employee or volunteer to take a lead on reporting all concerns via the clubs MyConcern tool.

Information should be shared with the CWO or APCM, who must approve any actions to be taken and any documentation or correspondence being sent out.

Employees with concerns should discuss them with the CWO or APCM immediately. If CWO or APCM is not available, then any concerns should be discussed with the SSM or Academy Manager, who will then seek advice if necessary, from other nominated welfare professionals (English Football League and the Football Association).

Volunteers with concerns should discuss these discreetly with their line manager or the CWO or APCM as soon as possible after the abuse or suspicions of abuse are observed. If unavailable, then any concerns should be discussed with the SSM or Academy Manager.

Concerns about colleagues should be addressed initially with CWO or APCM, but if this is not possible or the concern is about the either the CWO or APCM or other Senior member of staff, then any concerns should be discussed directly with Peterborough City Council, English Football League or The Football Association.

**Where there is evidence of immediate harm then the employee should phone 999 and report the incident to the Police.**

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**CREATING A SAFE ENVIRONMENT FOR EVERYONE**



### **Information Sharing**

If there is a reasonable concern that a child may be at risk of significant harm this will always override a professional agency requirement to keep information confidential.

If the club are approached about sharing information, the following will be considered:

- What information do they need?
- Why they need it?
- What they will do with the information?
- Who else needs to be informed if concerns about the individual persist?

If we are asked to provide information, we will never refuse solely on the grounds that all information is confidential.

#### **Peterborough United Football Club will consider:**

- What information the individual in question has given permission to use
- Any perceived risk to the individual which would warrant breaching confidentiality
- Any relevant information on risk to the individual, which would allow another agency to offer appropriate help and services or take action to reduce risk to the child
- Whether to ask advice from Northants County FA or the English Football League Welfare Officers

The football club will record when, what, why, and with who information has been shared; or why sharing was refused. This is recorded as the club may be required to justify reasons at a later date.

Staff should always seek advice if unsure and never refuse to provide information without considering the risks of not sharing. All decisions on information sharing will ultimately fall with the SSM, CWO and APCM.

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Useful contacts;

**Cambridge and Peterborough Referrals**

**Local Authority Safeguarding**

Cambridge and Peterborough Safeguarding Board

T: 01733 863744

E: [pscb@peterborough.gov.uk](mailto:pscb@peterborough.gov.uk)

W: <https://www.peterboroughlscb.org.uk>

**NSPCC**

Help for children & young people – ChildLine: 0800 1111

Help for adults concerned about a child: 0808 800 5000

NSPCC Peterborough: 01733 207620

W: <https://www.nspcc.org.uk/>

***Other Key Contacts***

**EFL CWO or APCM**

Alex Richards

E: [arichards@efl.com](mailto:arichards@efl.com)

T: 01772 325940

Northants FA

Candice Hart

E: [safeguarding@northantsfa.com](mailto:safeguarding@northantsfa.com)

T: 07535640452

W: <http://www.northamptonshirefa.com/about/rules-and-regulations/safeguarding-and-welfare>

**Local Police**

In an emergency, where there is a threat to life, serious injury, or a crime in progress call: 999

For non-emergency calls or to report a crime call: 101

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**Football Club Contacts**

Bob Symns, Senior Safeguarding Manager (SSM)  
Chief Executive  
E: [Bob.symns@theposh.com](mailto:Bob.symns@theposh.com)  
T: 07711924165

Liz Elsom, Club Welfare Officer (CWO)  
Club Secretary  
E: [Liz.elsom@theposh.com](mailto:Liz.elsom@theposh.com)  
T: 07932772616

Kayleigh Stent, Academy Head of Safeguarding Player Care Manager (APCM)  
Training Ground Manager  
E: [Kayleigh.stent@theposh.com](mailto:Kayleigh.stent@theposh.com)  
T: 07772570113

Matthew Dye, Designated Safeguarding Officer (DSO)  
Head of Coaching  
E: [Matt.dyw@theposh.com](mailto:Matt.dyw@theposh.com)  
T: 07551007928

James Baum, Designated Safeguarding Officer (DSO)  
Academy Head Sport Scientist  
E: [James.baum@theposh.com](mailto:James.baum@theposh.com)  
T: 07877603826

Ryan Semple, Designated Safeguarding Officer (DSO)  
Youth Development Lead Phase Coach  
E: [ryan.semple@theposh.com](mailto:ryan.semple@theposh.com)  
T: 07843083868

Paolo Di Fabrizio, Designated Safeguarding Officer (DSO)  
Foundation Phase Lead Coach  
E: [Paolo.difabrizio@theposh.com](mailto:Paolo.difabrizio@theposh.com)  
T: 07463332226

CLUB SAFEGUARDING POLICY  
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Peterborough United Football Club Limited Safeguarding Flow Chart

After any Club activity/meeting, write down as much information about the incident as possible. This can be anything from a 'nagging doubt', cause for concern' to a 'disclosure'

Report the information through the correct protocol 'My Concern'  
If you are unable to access a computer straight away contact a member of the Safeguarding team to notify them then follow up on 'My Concern' when possible.

The SSM, CWO or APCM will receive the information and delegate out to a member of the team or deal with the information themselves.

DSO will be updated on all information along the way but the initial person/ player or staff member will not necessarily be notified with updates or an outcome.

If you feel the person is in immediate danger call – NSPCC Helpline 0808 800 5000

- Police 999

Then immediately after report to

- Liz Elsom, CWO 07932772616
- Kayleigh Stent, APCM 07772570113

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### Staff Personal Media Guidance and Procedures

#### Guidance for staff

**DO:**

- Gain written parent / carer permission before giving access to U18
- Explain to the parent/carer/player the method of communication to be used and the reasons
- Always use group texts or emails and always copy parents/carers and the designated member of safeguarding team into all communications with young people
- Make sure texts, emails are only in relation to specific club related activities
- Report to the SSM, CWO or APCM any inappropriate communication from a young person.

**DO NOT:**

- Use your personal phone to text a young person connected with the club
- Become friends with, follow (unless of work social media pages), or add to your personal social media network any potential
- Current or former young person (under 19) This includes use of "like"
- Use internet or web-based communications to send personal messages of a non-football nature to a child or young person. This includes, "banter" or comments
- Use language that is directly or could be misinterpreted as being racist, sexist, derogatory, threatening, abusive or sexualised in tone
- Use the PUFC username for personal use

Any of the above could lead to abuse of a position of trust and breach the standards of professional behaviour and conduct expected by the club and could be the subject of disciplinary procedures.

**The Club will:**

- Ensure all privacy settings are locked so that the pages are used explicitly for club matters and not as a place to meet or have private conversations
- Monitor social networking pages regularly and where appropriate, raise any concerns or disciplinary matters.



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### CREATING A SAFE ENVIRONMENT FOR EVERYONE



*Please refer to the club policy on Acceptable use of IT and IT and Internet use policy.*

*Remember your Induction training and the club safeguarding code of conduct.*

#### **Player Personal Media Guidance and Procedures Under 18**

Within the club we want you to use social networks and the internet safely to get or receive information. The guidance below is to keep everyone safe and to ensure we respect each other.

The club will:

- Monitor social networking pages regularly and where appropriate (this can also be shared information with the club), raise any concerns or disciplinary matters
- Gain written parent / carer permission before giving access to Under 18
- Explain to the parent/carer/player the method of communication is to be used between parents, players and staff and the reasons
- Always use group texts or emails and always copy parents/carers and the designated member of safeguarding team into all communications with young people
- Make sure texts, emails are only in relation to specific club related activities

#### **Guidance for players**

- Know who from the club should be contacting you and which site they will use to do so
- Do not post, text or email things that are hurtful, insulting, offensive, abusive, threatening or discriminatory (e.g. racist, sexist or homophobic). This could be against the rules of football or even criminal and may lead to disciplinary action
- Do not give out personal details including mobile phone numbers, email addresses or social media account access (such as accepting friend or follow requests) to people you do not know well online.

#### **Use all guidance from social networking sites to keep yourself safe**

- No matter how well you get on with coaches, manager, staff do not invite them to become your friends online. *They have been told not to accept such invitations*
- Tell an adult you trust or a member of the safeguarding team if you are asked to become the friend of an adult involved in the club or within football

# CLUB SAFEGUARDING POLICY

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### Procedures for Youth Produced Sexual Imagery

#### Guidance for staff

##### Definitions:

“Youth produced” means young people sharing images that they, or another young person have created of themselves. “Imagery” means both still and moving videos.

##### Description:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18
- A person under the age of 18 shares sexual imagery created by another person with a peer under the age of 18 or an adult

A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

##### Legislation:

The Protection of Children Act 1978 as amended in the Sexual Offences Act 2003 states that it is illegal to make, possess, distribute any imagery of someone under 18 which is “indecent”. This includes imagery of yourself if you are under 18.

**Note that the sharing of sexual imagery of people under 18 by adults constitutes sexual abuse and will lead to an immediate police referral.**

##### What should you do?

- You should NOT view the imagery
- Refer the incident to a member of the safeguarding team as soon as possible via the ‘My Concern’ procedure this must be within 24 hrs.

##### What will happen next

- A member of the safeguarding team will hold an initial review meeting with appropriate staff
- Subsequently there will be interviews with young people involved (if appropriate)
- Parents will be involved as soon as possible (unless there is a definite reason not to)
- If at any stage, it becomes apparent that a young person has been harmed or at risk of harm or that a criminal offence may have been committed a member of the safeguarding team will make a referral to the police or social care. This would include

# CLUB SAFEGUARDING POLICY

## CREATING A SAFE ENVIRONMENT FOR EVERYONE



- 
- where an adult is involved, violent acts, or the young person is being black mailed or groomed

At all times the victim's well- being will be of paramount importance.

### Procedures for Youth Produced Sexual Imagery

#### Guidance for players Legislation:

The Protection of Children Act 1978 as amended in the Sexual Offences Act 2003 states that it is illegal to make, possess, distribute any imagery of someone under 18 which is "indecent". This includes imagery of yourself if you are under 18.

#### You must not:

- Create and share with anyone any sexual images-photos or videos- of yourself
- Share sexual images-photos or videos-with any other whether they are under the age of 18 or not
- Be in possession of sexual images-photos or videos- created by another person under the age of 18
- Be in possession of any sexual image-photos or videos- sent to you by an adult

If any of the above should happen, please speak immediately to a person you trust or CWO or APCM and Welfare. You should not show the imagery to anyone else.

#### What will happen next

- The person you have spoken to will tell the CWO or APCM and Welfare
- If appropriate The CWO or APCM and Welfare will speak with you
- Parents will be involved as soon as possible (unless there is a definite reason not to).

If at any stage, it becomes apparent that a you or another young person has been harmed or is at risk of harm the CWO or APCM and Welfare will make a referral to the police or social care. This would include where an adult is involved, violent acts, or the young person is being black mailed or groomed.

*Remember we are here to help and support you.*

# CLUB SAFEGUARDING POLICY

## CREATING A SAFE ENVIRONMENT FOR EVERYONE



### Appendix 1 - Abuse Policy

Date Written: 01.07.2018  
Updated: 01.07.2019  
Updated: 04.07.2020  
Updated: 10.10.2020  
Updated: 01.01.2021  
Updates: 29.04.2021  
Updated 13.08.2021

In respect of children, the Football Association of England defines abuse into five categories. This is to help explain what abuse and harm is.

#### **Low-level concern.**

A low-level concern is any concern about an adult's behaviour towards a child that does not meet the allegation threshold set out above or is not otherwise serious enough to consider a referral to the LADO.

#### **Neglect**

Neglect is the ongoing failure to meet a child, young person or vulnerable adult's basic physical and psychological needs, e.g. for food, warmth and clothing, or emotional needs such as attention and affection. It occurs if children or young people are left alone or inadequately supervised or where they are exposed to danger, injury or extreme weather conditions.

In activities, neglect could occur if children do not have proper supervision, clothing or are allowed or encouraged to play whilst injured. It could occur if a child or young person's needs are disregarded before, during, or after a game or training.

#### **Physical abuse**

Physical abuse occurs if someone were to physically hit, burn, poison, shake or in some way hurt or injure children and/or young people, or fail to prevent these injuries from happening.

Within football, physical abuse could happen where training methods are inappropriate for the developmental age of the child or young person, where they are allowed to play with an injury or where inappropriate drugs or alcohol are offered or accepted, where a child or young person is hit or physically restrained or manhandled by those supervising the game and or training session.

It should be noted that only clinical medical officers/consultant paediatrician should diagnose when an injury is non-accidental. It is not the responsibility of staff to determine the cause of injury (except where these are football related injuries).

# CLUB SAFEGUARDING POLICY

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### **Sexual abuse**

Sexual abuse occurs if children or YP are used to meet another person's sexual needs. This includes any form of sexual behaviour with a child or YP (by an adult (male or female) or another child or YP), the use of sexually-explicit language and jokes, inappropriate touching, exposure to pornographic material, being made to watch sexual activities or encouraging children or vulnerable adults to behave in sexually inappropriate ways.

Sexual abuse can occur in sporting settings. For example, where there is inappropriate touching, or where sexually explicit jokes occur between adults and children or young people or if indecent images are taken or adapted, shared and/or placed on child pornography sites.

### **Child Sexual Exploitation**

This is a form of sexual abuse. It involves exploitative situations, contexts and relationships where YP receive something e.g. drugs, alcohol, gifts, money. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity.

Sexual exploitation can take many forms ranging from seemingly consensual relationships where sex is exchanged for affections or gifts or seriously organised crime from groups or gangs.

Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. (Staff working in community trusts are most likely to identify and work with or support young people at risk of CSE.)

### **Grooming**

Grooming is defined as developing the trust of a child or YP for the purpose of sexual abuse, sexual exploitation or trafficking. Grooming can happen both on-line and in person.

### **Emotional abuse**

This is the persistent emotional maltreatment of a child or YP that causes severe and persistent adverse effect on their emotional development.

Examples of emotional abuse include frequent threatening, taunting or sarcastic behaviour, along with with-holding affection by a parent or legal guardian or being extremely over-protective. It includes racist or sexist behaviour and demeaning initiation ceremonies. It can be inflicted by other children and young people as well as by adults. Children and young people who are being abused or bullied in any way will also experience emotional abuse.

In football, coaches or parents emotionally abuse children and young people if they constantly criticise, abuse their power, or impose unrealistic pressure to perform to a high standard. It may also occur if a Club allows members to deride people with disabilities or from minority cultures and use derogatory language about them or to them.

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**Appendix 2 – Accommodation Policy**

Date Written: 01.07.2018  
Updated: 01.07.2019  
Updated: 04.07.2020  
Updated: 10.10.2020  
Updated: 01.01.2021  
Updated 13.08.2021

Where players require Club provided accommodation, the following steps are made to recruit accommodation providers to look after the player for the duration stipulate on an individual basis:

1. Adverts on the club website and on social media.
2. Telephone calls and email exchange between interested parties.
3. Meeting/House visit of potential accommodation provider and the Safeguarding Officer and Youth Team Manager.
4. An FA CRC, personal details form, provider application form is required before an agreement is signed.
5. A copy of Gas safety certificate is given to PUFC
6. An individual property risk assessment is done on the accommodation
7. An individual property fire risk assessment is done on the accommodation
8. Accommodation providers are issued with a copy of the player handbook outlining club guidance on rules plus nutrition guidance.

Successful accommodation providers will have monthly phone calls or site visits from the Safeguarding Officer and the Youth Team Manager and random sport checks throughout the season.

Players in Club provide accommodation must:

Players must not allow anyone else onto the premises without the permission of the accommodation provider, including other scholars.

Players are not permitted to spend the night at any other premises without the permission of the Academy Manager, Youth Team Manager or the Player Care Manager.

Keep bedrooms' tidy, please keep clothes hung up or in drawers.

Always be mindful of security at your accommodation, close windows and doors at the appropriate times.

Players are responsible for washing their own training kit, in line with accommodation provider's guidelines.

Players are expected to clean any facility that they have used, to a reasonable standard, if necessary.

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If provisions run low, (e.g milk) please let accommodation providers know in a polite and courteous manner.

The house phone is out of bounds unless for emergencies.

Players are to tidy up all food areas after eating at all times OR as requested by the accommodation provider.

Accommodation providers will be asked to notify the club if players are eating or storing inappropriate foods.

All players in club provided accommodation will have regular spot checks throughout the season.

Accommodation providers will be expected to notify the club of any problems or concerns.

PUFC do not place players in accommodation under the age of 16 years old.

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**Appendix 3 – Allegations against staff Policy**

Date written: 13.01.2021

Updated: 13.08.2021

Peterborough United Football Club is committed to providing a safe and secure environment and the upmost level of care for all its players and staff.

Any allegations of abuse made against any member of staff or volunteer will be dealt with immediately while ensuring that we maintain the highest level of care and protection for the child or adult at risk. The Football Club will also be ensuring that the correct and professional support is issued to the alleged staff member or volunteer.

**Purpose**

The purpose of this policy is to outline the procedure for dealing with allegations against any staff dependent on the current situation and all the circumstances surrounding the allegation.

The policy is to be followed at all times when dealing with an allegation, but in each case must be adapted to suit. This policy will be used alongside the Football Club's complaints and safeguarding policy.

This policy will come into play in any case where it is alleged or suspected that a member of the Peterborough United staffing team or volunteer has:

- behaved in a way that has harmed a child or adult at risk, or may have harmed a child or adult at risk
- possibly committed a criminal offence against or related to a child or adult at risk
- behave towards a child or adult at risk in a way that indicated he or she may pose a risk to children/adults at risk

**Timescale**

It is important that any allegation is dealt with effectively, professionally and as quickly as possible to ensure:

- any risk to the child/adult at risk is minimised
- the impact on the child's academic progress is minimised
- stress to employee concerned is minimised
- a fair and thorough investigation for all parties.

To ensure this is effective the policy will also link in with the Football Club's complaints policy.



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### Procedure

All allegations made against staff should be reported immediately to any member of the Peterborough United safeguarding team. (the team and their contact details can be found at [www.theposh.com](http://www.theposh.com) , PMA library or MyConcern)

Complaints about a member of the safeguarding team should be reported to the SSM (the contact details can be found at [www.theposh.com](http://www.theposh.com) , PMA library or MyConcern)

Complaints about the SSM should be reported to a member of the Peterborough United board (the details of the board can be found at [www.theposh.com](http://www.theposh.com)) a board member will then contact the designated officer at the local authority and appoint a member of the Peterborough United safeguarding team)

Staff who are concerned about the conduct of a colleague towards a child/adult at risk are undoubtedly placed in a very uncomfortable and difficult situation. This staff member may worry that they have misunderstood the situation and they may wonder whether a report could jeopardise their colleague's career. Peterborough United remind all staff that they must remember that the welfare of the child/adult at risk is paramount and they must report any of their concerns immediately, following the correct channels stated in this policy.

A member of the safeguarding team will contact The FA safeguarding team and EFL safeguarding team and the designated officer at the local authority. These discussions will decide whether:

- more information is required; or
- no further actions are needed; or
- a strategy discussion should take place; or
- there should be immediate involvement of the police or social care.

The Football Club will share all available information with the FA safeguarding team designated officer about the allegation, the child, and the person against whom the allegation has been made and consider whether a police investigation or a strategy discussion is needed. Representatives from other agencies may be invited to the discussion and could include representatives from health, social care and police.

### Investigation

An investigation into the allegation is normally carried out by the Local Authority Designated Officer (LADO) and or the FA safeguarding team or by the Football Club. This will be agreed at the initial evaluation stage.

Any internal investigations must be second to any safeguarding investigation and may need to be delayed until the external investigation is complete.

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An investigating team will be put in place by the Football Club, this will include:

- the investigating officer, this is normally the CWO or Head of Academy safeguarding/ player care manager, they will;
  1. investigate fully, while seeking guidance and support from the Football Club's HR company – Peninsula
  2. put together a full case report
  3. issue the final case report to the investigation lead
- the investigation lead, this will normally be the CEO or Academy Manager, they will;
  1. read the full case report from the investigating officer
  2. provide their information and thoughts with the Peterborough United board
  3. decide on the outcome of the investigation

The investigating officer will not have a role within the decision making to ensure that a non-biased discussion is made.

The following definitions should be used when determining the outcome of the investigation:

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

#### Supporting those involved

*The person(s) who makes the allegation and their parents/carers.*

Parents and carers will be notified if their child makes or is involved in an allegation against staff if they do not already know. However, if the police or social services are to be involved, they will be contacted first and will be advised as to what information may or may not be disclosed to the parents. *(There will be a staff member designated to the role of liaising with the parents and child about the case and ensuring that they are fully informed as far as is possible.)* Parents and carers will be made aware of any progress in the investigation, and where there is no criminal prosecution, the outcome will be explained to them.

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There may be a disciplinary outcome. During a disciplinary hearing the deliberations and information used for deciding are usually confidential, however parents will be told the outcome in confidence.

Social services and the police may be involved and will provide the school with advice on what type of additional support the child may need.

The club's whistleblowing code which can be located on our Club website [www.theposh.com/MyConcern](http://www.theposh.com/MyConcern) or within the PMA library enables staff to raise concerns or allegations against their colleagues in confidence and for a sensitive enquiry to take place.

### **The employee**

Peterborough United has a duty of care to all its employees and therefore the Club will take steps to minimise the stress of any allegation and the investigation process as much as possible.

The person who is the subject of the investigation will be informed as soon as possible and usually after the initial discussion with the designated officer. The employee will then be advised on what the next course of action will be. However, if the police or social services are to be involved, they will be contacted before the employee, and will advise as to what information may be disclosed to the person under investigation.

The designated member of the safeguarding team will keep the employee informed of the progress of the case and any other work-related issues.

The employee may need additional support and the Football Club will consider what might be appropriate to best accommodate this. If it is a criminal investigation and the police are involved, they may provide this additional support.

### **Confidentiality**

Peterborough United will make every effort to guard the privacy of all the parties during and after an investigation into an allegation. It is in everyone's best interest to maintain this confidentiality to ensure a fair investigation with minimum impact for all parties involved.

Any breach of confidentiality will be taken seriously and may warrant its own investigation from the Football Club.

### **Suspensions**

The club will not suspend a member of staff without serious consideration and will not do it automatically once an allegation has been made. Depending on the nature of the case, it may be possible that alternative arrangements are made so that the individual can continue working.

The employer holds the power to suspend an employee but will listen to the views of the police and or FA and or LADO regarding suspension.

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In the case of suspension, the employee will receive written confirmation within one working day and will be informed of the reason for the suspension.

### **Resignations**

If an employee resigns when the allegation is made against them or during an investigation, the investigation will continue until an outcome has been reached, with or without the employee's cooperation. They will be given full opportunity to answer the allegation.

### **Record keeping**

Where an allegation is found to be malicious, all information of the allegation will be removed from the record of the employee concerned.

For all other allegations, records of investigations and outcomes will be kept in the employee's personal file and they will be given a copy. The record will be kept, including for people who leave the organisation, at least until the person reaches normal retirement age or for 10 years if that will be longer, from the date of the allegation.

Details of any allegation made by a young person will be kept in the confidential section of their record.

All information related to safeguarding at Peterborough United Football Club is logged on the main online portal 'MyConcern'.

### **Action on conclusion of the case**

If the allegation is substantiated and the employee is dismissed or resigns, or we cease to use the volunteer's services, the Football Club will consider whether a referral must be made to the DBS as appropriate.

If it is decided that the employee may return to work after a suspension, then sufficient provisions will be put in place by the Football Club to ensure that the transition for the, returning to work is as smooth as possible.

This may involve a phased return for a trial period or the use of another member of staff as a support system in the short term. If the child/adult at risk who made the allegation is still at the club, the club will consider what needs to be done to manage the contact between employee and child/adult at risk.

### **Action in the case of false or malicious allegations**

Where an allegation is proved to be false, the SSM may refer to social services to determine whether the child/adult at risk needs support or has been abused by someone else.

The club's safeguarding policy sets out the disciplinary action that may be taken against anyone found to have made malicious allegations against club staff. The SSM may consult the Club board when considering what action to take.

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If the claim has been made by a person who is not a member of the Football Club, the Club may pass the information to the police who may take further action against that person.

#### **After the case**

No matter what the outcome is of an allegation of abuse against staff, the Club will review the case to see if there are any improvements that can be made in its practice or policy that may help to deal with cases in the future.

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**Appendix 4 – Anti-Bullying Policy**

Date Written: 01.07.2018  
Updated: 01.07.2019  
Updated: 04.07.2020  
Updated: 10.10.2020  
Updated: 01.01.2021  
Updated: 13.08.2021

**Purpose:**

This policy aims to ensure that all those connected to Peterborough United Football Club are protected from any form of bullying behaviour. Whilst we cannot guarantee there will be no bullying of any kind whatsoever, the ongoing and long-term aim of the policy is to reduce the number of people who may experience bullying through increasing awareness of this behaviour, its causes and consequences in the players, staff, parents and carers and visitors. It will also help people find and put into practice a series of solutions to the problem of bullying. This policy will ensure that individual cases of bullying will be dealt with consistently and in a constructive and fair manner when they occur.

Bullying is when one or more people physically, emotionally or psychologically hurt or cause harm to a person who is in a weaker position than him/her, and so is less able to defend himself/herself. Bullying usually happens over a period of time and consists of a series of different incidents. Bullying is a behaviour in which an individual(s) make choices about how to act in order to damage others. Peterborough United Football Club will challenge such choices wherever they are encountered and sanctions, depending on the severity of the offence, will be enforced against those who bully. People are expected to act in principled and reflective ways. The causes of bullying are complex and those who bully often cite their own experiences of bullying when trying to explain their behaviour. Whilst staff will be sympathetic and supportive, it is not a justification for bullying others and will not exempt bullies from taking responsibility for their actions.

**Types of bullying:**

**Physical:**

- Hitting
- Kicking
- Spitting
- Tripping someone up
- Stealing/damaging someone's belongings.

**Verbal:**

- Name-calling
- Insulting a person's family
- Threats of physical violence

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- Spreading rumours
- Constantly putting a person down.

#### Emotional/psychological:

- Exclusion from a group
- Humiliation

#### Racist:

- Insulting language/gestures based on a person's actual or perceived ethnic origin and/or faith
- Name-calling
- Graffiti
- Racially motivated violence.

#### Sexual:

- Sexually insulting language/gestures
- Name-calling
- Graffiti
- Unwanted physical contact.

#### Homophobic:

- Insulting language/gestures based on a person's actual or perceived sexuality
- Name-calling
- Graffiti
- Homophobic violence

#### Electronic:

- Bullying by text message
- Bullying on the internet (in chat rooms, on bulletin boards and through instant messages services)
- Hate websites

Peterborough United Football Club takes any form of bullying very seriously, deems bullying as unacceptable behaviour and will not tolerate it. All members of staff will remain vigilant at all times to recognise any signs of bullying.

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### Principles for handling bullying:

- All reports of bullying are to be taken seriously
- Staff will work with the person to ensure that they feel safe
- Staff will work with the bullies to change the bullying behaviour
- Staff will work with all parties involved to support and encourage a solution to the bullying
- Asking a person to not attend a Peterborough United activity is a last resort. If particularly serious victimisation, abuse, intimidation or physical bullying against any other person belonging to the Football Club is reported and/or witnessed, those people who carried out the bullying will be dealt with in line with the Club's behaviour policy. This may include being asked not to attend any Football Club activity while the allegation is being investigated and solutions are sought. If the solutions have no effect, or if the bullying was so severe that it would be harmful to the rest of the Football Club to allow the person to return, he/she may have their contract terminated, receive a Stadium or Training Ground ban

### Commitment from the Club:

- Use any opportunity to discuss aspects of bullying, and the appropriate way to behave towards each other.
- Deal quickly, firmly and fairly with any complaints, involving parents/carers where necessary.
- Review the Anti-Bullying Policy and its degree of success.

### Procedure:

#### Recording of incidents:

1. Report bullying to any Peterborough United staff who will raise a cause for concern with a member Safeguarding Team.
2. All incidents of bullying will be recorded by a member of the safeguarding team and kept in a secure location. The safeguarding team will be responsible for maintaining these records and analysing any apparent patterns.

#### Example of disciplinary steps:

- Step 1 - the bully(ies) will be warned officially to stop offending
- Step 2 - where necessary and appropriate the bully(ies) parents/carers will be informed and a meeting arranged with a member of the safeguarding team
- Step 3 - if step two is not necessary a meeting will be arranged with a member of the safeguarding team, and were necessary, Academy Manager and or CEO
- Step 4 - the bully(ies) will be asked not to attend a Peterborough United event for a fixed period (usually 1 week).



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- Step 5 – implementation of the Football Disciplinary Process with the Board of Directors which may result in the termination of contract, Stadium or Training ground ban

**NB: serious incidents will result in the police being informed and the Football Club will allow them to carry out an investigation against the bully(ies).**

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**Appendix 5 – Complaint Policy**

Date Written: 01.07.2018  
Updated: 01.07.2019  
Updated: 04.07.2020  
Updated: 10.10.2020  
Updated: 01.01.2021  
Updated: 3.08.2021

Peterborough United Football Club is committed to providing high quality services to members of the public. We value complaints and use information learnt from them to help us improve the services we offer.

**What is a complaint?**

Peterborough United regard a complaint as any expression of dissatisfaction about our action or

lack of action, or about the standard of service provided by us or on our behalf.

**What can I complain about?**

You can complain about things like:

- The quality and standard of any service we provide.
- Failure to provide a service
- The quality of our facilities.
- Unfair treatment or inappropriate behaviour by a member of Peterborough United staff.

Your complaint may involve more than one aspect of the above, more than one department, or be about someone working on our behalf.

**What can't I complain about?**

There are some things we can't deal with through our complaint handling procedure. These include:

- A request under Freedom of Information or Data Protection legislation
- A request for information or an explanation of policy or practice
- An issue which is being, or has been, considered by a court or tribunal
- An attempt to have a complaint reconsidered where we have already given our final decision

following an investigation.

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### Who can complain?

Anyone who receives, requests or is directly affected by the services of Peterborough United can make a complaint to us. We encourage anyone with a complaint to approach us directly

### How do I complain?

You can complain in person, by phone, in writing, or by email. It is easier for us to resolve complaints if you raise them as soon as you become aware of the issue. Please talk to a member of staff within the department you are complaining about so that they can try to resolve any problems on the spot.

When complaining, tell us:

- Your full name and address
- As much as you can about the complaint
- What has gone wrong
- How you would like us to resolve the matter.

### What will happen if I complain?

Our complaint procedure has two stages:

#### Stage 1 – Frontline Resolution

Peterborough United aim to resolve complaints as quickly as possible. This could mean an on-the-spot apology and explanation if something has clearly gone wrong and immediate action to resolve the problem at hand. Where possible you should raise the problem with the relevant staff member. This can be done face to face, by phone, in writing or by an email. Peterborough United will give you our decision at Stage 1 within five working days, unless there are exceptional circumstances. If you are not satisfied with the response we give at this stage, we will tell you what you can do next. If you choose to, you can take your complaint to Stage 2 of the complaint procedure. You may choose to do this immediately or shortly after you get our initial decision.

#### Stage 2 – Complaint Investigation

Stage 2 deals with two types of complaint: those that have not been resolved at Stage 1 and those that are complex and require detailed investigation. Although we will also accept

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complaints that are made in person or on the phone, we encourage you to follow this up in writing or by email in order to best assist the investigation process.

When using Stage 2 we will:

- Acknowledge receipt of your complaint within three working days and tell you who is dealing with your complaint
- Discuss your complaint with you to understand why you remain dissatisfied and what outcome you are looking for
- Give you a full response to the complaint as soon as possible and within 20 working days

If our investigation will take longer than 20 working days, we will tell you. We will agree revised time limits with you and keep you updated on progress.

The outcome and decision of the Club will be final.

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**Appendix 6 – Data Protection Policy**

Date Written: 01.07.2018  
Updated: 01.07.2019  
Updated: 04.07.2020  
Updated: 10.10.2020  
Updated: 01.01.2021  
Updated: 13.08.2021

**A) INTRODUCTION**

We may have to collect and use information about people with whom we work. This personal information must be handled and dealt with properly, however it is collected, recorded and used, and whether it be on paper, in computer records or recorded by any other means.

We regard the lawful and correct treatment of personal information as very important to our successful operation and to maintaining confidence between us and those with whom we carry out business. We will ensure that we treat personal information lawfully and correctly.

To this end we fully endorse and adhere to the principles of the General Data Protection Regulation (GDPR).

This policy applies to the processing of personal data in manual and electronic records kept by us in connection with our human resources function as described below. It also covers our response to any data breach and other rights under the GDPR.

This policy applies to the personal data of job applicants, existing and former employees, apprentices, volunteers, placement students, workers and self-employed contractors. These are referred to in this policy as relevant individuals.

**B) DEFINITIONS**

“Personal data” is information that relates to an identifiable person who can be directly or indirectly identified from that information, for example, a person’s name, identification number, location, online identifier. It can also include pseudonymised data.

“Special categories of personal data” is data which relates to an individual’s health, sex life, sexual orientation, race, ethnic origin, political opinion, religion, and trade union membership. It also includes genetic and biometric data (where used for ID purposes).

“Criminal offence data” is data which relates to an individual’s criminal convictions and offences.

“Data processing” is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval,

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consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

### C) DATA PROTECTION PRINCIPLES

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) processing will be fair, lawful and transparent
- b) data be collected for specific, explicit, and legitimate purposes
- c) data collected will be adequate, relevant and limited to what is necessary for the purposes of processing
- d) data will be kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- e) data is not kept for longer than is necessary for its given purpose
- f) data will be processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- g) we will comply with the relevant GDPR procedures for international transferring of personal data.

### D) TYPES OF DATA HELD

We keep several categories of personal data on our employees in order to carry out effective and efficient processes. We keep this data in a personnel file relating to each employee and we also hold the data within our computer systems, for example, our holiday booking system.

Specifically, we hold the following types of data:

- a) personal details such as name, address, phone numbers
- b) information gathered via the recruitment process such as that entered into a CV or included in a CV cover letter, references from former employers, details on your education and employment history etc
- c) details relating to pay administration such as National Insurance numbers, bank account details and tax codes
- d) medical or health information
- e) information relating to your employment with us, including:
  - i) job title and job descriptions
  - ii) your salary
  - iii) your wider terms and conditions of employment
  - iv) details of formal and informal proceedings involving you such as letters of concern, disciplinary and grievance proceedings, your annual leave records, appraisal and performance information
  - v) internal and external training modules undertaken

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All of the above information is required for our processing activities. More information on those processing activities are included in our privacy notice for employees, which is available from your manager.

#### **E) EMPLOYEE RIGHTS**

You have the following rights in relation to the personal data we hold on you:

- a) the right to be informed about the data we hold on you and what we do with it;
- b) the right of access to the data we hold on you. More information on this can be found in the section headed "Access to Data" below and in our separate policy on Subject Access Requests";
- c) the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as 'rectification';
- d) the right to have data deleted in certain circumstances. This is also known as 'erasure';
- e) the right to restrict the processing of the data;
- f) the right to transfer the data we hold on you to another party. This is also known as 'portability';
- g) the right to object to the inclusion of any information;
- h) the right to regulate any automated decision-making and profiling of personal data.

More information can be found on each of these rights in our separate policy on employee rights under GDPR.

#### **F) RESPONSIBILITIES**

In order to protect the personal data of relevant individuals, those within our business who must process data as part of their role have been made aware of our policies on data protection.

We have also appointed employees with responsibility for reviewing and auditing our data protection systems

#### **G) LAWFUL BASES OF PROCESSING**

We acknowledge that processing may be only be carried out where a lawful basis for that processing exists and we have assigned a lawful basis against each processing activity.

Where no other lawful basis applies, we may seek to rely on the employee's consent in order to process data.

However, we recognise the high standard attached to its use. We understand that consent must be freely given, specific, informed and unambiguous. Where consent is to be sought, we will do so on a specific and individual basis where appropriate. Employees will be given clear instructions on the desired processing activity, informed of the consequences of their consent and of their clear right to withdraw consent at any time.

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#### H) ACCESS TO DATA

As stated above, employees have a right to access the personal data that we hold on them. To exercise this right, employees should make a Subject Access Request. We will comply with the request without delay, and within one month unless, in accordance with legislation, we decide that an extension is required. Those who make a request will be kept fully informed of any decision to extend the time limit.

No change will be made for complying with a request unless the request is manifestly unfounded, excessive or repetitive, or unless a request is made for duplicate copies to be provided to parties other than the employee making the request. In these circumstances, a reasonable charge will be applied.

Further information on making a subject access request is contained in our Subject Access Request policy.

#### I) DATA DISCLOSURES

The Company may be required to disclose certain data/information to any person. The circumstances leading to such disclosures include:

- a) any employee benefits operated by third parties;
- b) disabled individuals - whether any reasonable adjustments are required to assist them at work;
- c) individuals' health data - to comply with health and safety or occupational health obligations towards the employee;
- d) for Statutory Sick Pay purposes;
- e) HR management and administration - to consider how an individual's health affects his or her ability to do their job;
- f) the smooth operation of any employee insurance policies or pension plans;
- g) to assist law enforcement or a relevant authority to prevent or detect crime or prosecute offenders or to assess or collect any tax or duty.

These kinds of disclosures will only be made when strictly necessary for the purpose.

#### J) DATA SECURITY

All our employees are aware that hard copy personal information should be kept in a locked filing cabinet, drawer, or safe.

Employees are aware of their roles and responsibilities when their role involves the processing of data. All employees are instructed to store files or written information of a confidential nature in a secure manner so that are only accessed by people who have a need and a right to access them and to ensure that screen locks are implemented on all PCs, laptops etc when unattended. No files or written information of a confidential nature are to be left where they can be read by unauthorised people.



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Where data is computerised, it should be coded, encrypted or password protected both on a local hard drive and on a network drive that is regularly backed up. If a copy is kept on removable storage media, that media must itself be kept in a locked filing cabinet, drawer, or safe.

Employees must always use the passwords provided to access the computer system and not abuse them by passing them on to people who should not have them.

Personal data relating to employees should not be kept or transported on laptops, USB sticks, or similar devices, unless prior authorisation has been received. Where personal data is recorded on any such device it should be protected by:

- a) ensuring that data is recorded on such devices only where absolutely necessary.
- b) using an encrypted system – a folder should be created to store the files that need extra protection and all files created or moved to this folder should be automatically encrypted.
- c) ensuring that laptops or USB drives are not left where they can be stolen.

Failure to follow the Company's rules on data security may be dealt with via the Company's disciplinary procedure. Appropriate sanctions include dismissal with or without notice dependent on the severity of the failure.

#### **K) THIRD PARTY PROCESSING**

Where we engage third parties to process data on our behalf, we will ensure, via a data processing agreement with the third party, that the third party takes such measures in order to maintain the Company's commitment to protecting data.

#### **L) INTERNATIONAL DATA TRANSFERS**

The Company may be required to transfer personal data to a country/countries outside of the EEA. Where this occurs, the following safeguards are adopted.

#### **M) REQUIREMENT TO NOTIFY BREACHES**

All data breaches will be recorded on our Data Breach Register. Where legally required, we will report a breach to the Information Commissioner within 72 hours of discovery. In addition, where legally required, we will inform the individual whose data was subject to breach.

More information on breach notification is available in our Breach Notification policy.

#### **N) TRAINING**

New employees must read and understand the policies on data protection as part of their induction.

## CLUB SAFEGUARDING POLICY

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All employees receive training covering basic information about confidentiality, data protection and the actions to take upon identifying a potential data breach.

The nominated data controller/auditors/protection officers for the Company are trained appropriately in their roles under the GDPR.

All employees who need to use the computer system are trained to protect individuals' private data, to ensure data security, and to understand the consequences to them as individuals and the Company of any potential lapses and breaches of the Company's policies and procedures.

#### **O) RECORDS**

The Company keeps records of its processing activities including the purpose for the processing and retention periods in its HR Data Record. These records will be kept up to date so that they reflect current processing activities.

#### **P) DATA PROTECTION COMPLIANCE**

The nominated Data Protection Officer and Compliance Officer details are available from your Line Manager.

# CLUB SAFEGUARDING POLICY

## CREATING A SAFE ENVIRONMENT FOR EVERYONE



### Appendix 7 – Equality Policy

Peterborough United Football Club supports The Football Association's 'Football For All' Policy.

The EFL is responsible for setting the standards, values and expectations of all Clubs in relation to equality, inclusion and diversity. Football is for everyone; it belongs to, and should be enjoyed by anyone who wants to participate in it, whether as a player, official, staff member or spectator.

The aim of Peterborough United Football Club's Equality Policy is to promote our own equality objectives and in doing so, help to ensure that everyone is treated fairly and with respect. All Peterborough United representatives should abide and adhere to this Policy and to the requirements of the Equality Act 2010. In doing so, we are working towards being legally compliant in relation to equality legislation.

Peterborough United's commitment is to promote inclusion and to confront and eliminate discrimination whether by reason of age, sex, gender identity, sexual orientation, marital or civil partnership status, race, nationality, ethnicity, religion or belief, ability or disability, pregnancy and maternity and to encourage equal opportunities. These are known as 'protected characteristics' under the Equality Act 2010. Peterborough United also expect all fans, supporters, players, staff, volunteers and representatives to extend this fair treatment to other groups, such as those on low income, homeless community, asylum seekers and refugees and offenders under rehabilitation.

This Policy is fully supported by the Board of Peterborough United and Elizabeth Elsom, Club Secretary is responsible for the implementation of this policy across the football club, academy, Foundation and all other areas of the business.

Peterborough United will ensure that it treats everyone fairly and with respect and that it will provide access and opportunities for all members of the community to take part in, and enjoy, its activities. Every staff member, Board member, official, spectator, fan and visiting teams can be assured of an environment in which their rights, dignity and individual worth are respected, and in particular that they are able to work and watch football in an environment without the threat of intimidation, victimisation, harassment or abuse.

### **Complaints and compliance**

Peterborough United regards all of the forms of discriminatory behaviour, including (but not limited to) behaviour described in the Appendix as unacceptable, and is concerned to ensure that individuals feel able to raise any bona fide grievance or complaint related to such behaviour without fear of being penalised for doing so. Appropriate disciplinary action will be taken against any employee, member or volunteer, spectator or fan who is found, after a full investigation, to have violated the Equality Policy.

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**Positive Action and Training**

Peterborough United is committed to equality inclusion and anti-discrimination as part of the EFL's Equality Code of Practice. Peterborough United will commit to a programme of raising awareness and educating, investigating concerns and applying relevant and proportionate sanctions, campaigning, widening diversity and representation and promoting diverse role models, which we believe are all key actions to promote inclusion and eradicate discrimination within football. This Equality Policy will be reviewed and updated, if required, on an annual basis.

A handwritten signature in black ink, appearing to read 'Liz Elsom'.

Liz Elsom, Club Secretary and Staff Representative for Equality, Diversity and Inclusion

Date: 28th March 2018

A handwritten signature in black ink, appearing to read 'Bob Symns'.

Bob Symns, CEO and Board Representative for Equality, Diversity and Inclusion

Date: 28th March 2018

Date of next review: March 2020

Update: October 2020

Update: January 2021

**APPENDIX – Relevant legislation and forms of unacceptable discrimination**

**Legal rights**

Discrimination has been legally defined through a series of legislative acts, including the Race Relations Act, the Sex Discrimination Act, the Disability Discrimination Act and the Equality Act 2006.

In April 2010, the Equality Act 2010 received Royal Assent. The Equality Act 2010 is a new law which harmonises where possible, and in some cases extends, protection from discrimination. It applies throughout the UK and came into force in October 2010.

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Discrimination refers to unfavourable treatment on the basis of particular characteristics, which are known as the 'protected characteristics'. Under the Equality Act 2010, the protected characteristics are defined as age, disability, gender reassignment, marital or civil partnership status (employment only), pregnancy and maternity, race (which includes ethnic or national origin or nationality), religion or belief, sex (gender) and sexual orientation. These are the current descriptions under the legislation and Peterborough United Football Club may refer to these using different terminology.

Under the Equality Act 2010, individuals are protected from discrimination 'on grounds of' a protected characteristic\*. This means that individuals will be protected if they have a characteristic, are assumed to have it, associate with someone who has it or with someone who is assumed to have it. Forms of discrimination and discriminatory behaviour include the following:

### **Direct discrimination**

Direct discrimination can be described as less favourable treatment on the grounds of one of the protected characteristics.

### **Indirect discrimination**

Indirect discrimination occurs when a provision, criterion or practice is applied to an individual or group that would put persons of a particular characteristic at a particular disadvantage compared with other persons.

### **Discrimination arising from disability**

When a disabled person is treated unfavourably because of something connected with their disability and this unfavourable treatment cannot be justified, this is unlawful. This type of discrimination only relates to disability.

### **Harassment**

Harassment is defined as unwanted conduct relating to a protected characteristic that has the purpose or effect of violating a person's dignity, or which creates an intimidating or hostile, degrading, humiliating or offensive environment for that person.

**CLUB SAFEGUARDING POLICY**  
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**Victimisation**

It is unlawful to treat a person less favourably because he or she has made allegations or brought proceedings under the anti-discrimination legislation, or because they have helped another person to do so. To do so would constitute victimisation.

**Bullying**

Bullying is defined as a form of personal harassment involving the misuse of power, influence or position to persistently criticise, humiliate or undermine an individual.

If you have any concerns or issues about the above, please contact Peterborough United on **01733 563947** or [info@theposh.com](mailto:info@theposh.com).

\*The exception to this is pregnancy and maternity, which does not include protection by association or assumption – a woman is only protected from discrimination on grounds of her own pregnancy.

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**Appendix 8 – Fury Mascot Policy**

Date Written: 01.07.2018  
Updated: 01.07.2019  
Updated: 04.07.2020  
Updated: 10.10.2020  
Updated: 01.01.2021  
Updated: 13.08.2021

Peterborough United Football Club is committed to safeguarding and promoting the welfare of children, young people and all participants including adults who might be more vulnerable and expects all staff and volunteers to share this commitment.

Within our football club we have Peter Burrow our friendly fury mascot who is a responsible ambassador of Peterborough United Football Club. Peter Burrow is designed to engage and enhance fans experience both inside and outside of our club. This is a voluntary role within the club and the role mascot/s should represent fun, fair play and sportsmanship. The Club mascot/s will be responsible to the Match Day Safeguarding Officer.

**Mascot Duties**

1. Enhance the spectator experience and represent the club as a positive role model
2. Each mascot is accountable for his / her own behaviour at all times
3. Ensure the mascot uniform is returned to the club in good condition
4. To only use the mascot uniform when representing club activities
5. If invited to away matches stay in the stadium end appropriate to your team (or follow the guidance provided by club officials)
6. To follow instructions given by the Club's safeguarding team
7. Attend pre and post-match briefings as required
8. Provide crowd entertainment on match days before the match and at half time
9. To attend additional training as required e.g. safeguarding training Person

**Specification The individual must**

Be 18 years of age or older

Have an outgoing personality

Demonstrate excellent communication skills

Be committed to working within the Peterborough United team

Be committed to safe working practice

# CLUB SAFEGUARDING POLICY

## CREATING A SAFE ENVIRONMENT FOR EVERYONE



Be willing to undertake training appropriate to the role

Be willing and available to work outside normal office hours

### Recruitment

Clear information must be provided about the role and person specification. References should be taken up and a full employment history, including clear explanations for any gaps in employment. The role of the character mascot does fit into the category of 'Regulated Activity' therefore; the post is subject to an enhanced DBS criminal records check. This is a voluntary role and as such a volunteer's agreement must be signed and volunteer's policies and procedures must be followed. Appointment to this volunteering role will be subject to two written references indicating suitability for the role and a probationary period. The successful applicants should receive appropriate induction which will include:

1. A Safeguarding induction and Health and Safety briefing
2. Details of the Designated Safeguarding Officer and Match Day Safeguarding Officer
3. An orientation to the club
4. Copies of appropriate safeguarding policies and safeguarding and procedures
5. Issuing them with this policy and code of conduct
6. Identifying any training or support needs

### Code of Conduct

This code of conduct provides clear guidance on acceptable standards of behaviour required by the club. Furry Mascot/s must:

1. Ensure that any direct contact with children or vulnerable adults is appropriate and in an open environment
2. Always be accompanied by a Club nominated companion, steward or member of staff to ensure that the mascot is never be alone with children- the companion will act as the 'eyes and ears' of the mascot and answer any questions
3. Avoid direct contact with children and young people. Handshakes and waves are very appropriate, hugs should not be initiated
4. Ensure that hands are always visible, hand contact should be on shoulders only - the mascot assistant can assist in this by prompting 'give us a wave!' for any photographs
5. Report any concern / allegation or disclosure concerning risk or harm to children to the club DSO or on match day to the Match Day Safeguarding Officer
6. Follow the Club's policies and procedures for Safeguarding and protecting Children and Adults at Risk
7. Abide by the relevant Rules and Regulations of the EFL and the Football Association ("the Rules and Regulations")



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8. Maintain a responsible and co-operative attitude and uphold the ideals of fair play and sportsmanship
10. Show a positive and responsible attitude towards everyone involved in football
11. Be a responsible ambassador of the club
12. Recognise the referee and their assistants are the symbol of authority and always treat them with respect
13. Promptly obey any instructions given by the referee, assistant referee or any fourth official
14. Promptly comply with any instructions given by a steward, security guard or the police
15. Provide consent for images or video footage taken at the match which may be used for media, publication or promotional purposes
16. Attend training and learning opportunities as required by the club
17. Wear the uniform as directed by the club and follow the instructions of the nominated companion, steward or staff member who is accompanying them at all times in order to remain safe
18. Be responsible and accountable for their own behaviour at all times
19. Inform the DSO of any change in health status which may affect their ability to perform your duties
20. Inform the Club's DSO immediately if they become the subject of any external safeguarding concerns or investigation

**Furry Mascot Must Not:**

1. Act in an inappropriate manner with any child, children or vulnerable adult
2. Hold children for health and safety reasons – the parent/guardian should hold the child and then approach the furry mascot
3. Sit down when children and young people are present – this avoids the possibility of children sitting on or being taken onto your lap at any time
4. Approach children – always let them come to you
5. Influence, incite or condone unacceptable behaviour
6. Criticise or disrespect officials, opponents, coaches, other Mascots or fans

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7. Enter the field of play, nor must they interfere with any officials, make a nuisance of themselves or prevent the smooth and orderly progress of the match
8. Attempt to question or influence any decision made by a referee or assistant referee
9. Approach or attempt to communicate with any player, coach or club official either of their own team or opposing team
10. Interfere with any pitch equipment including, but not limited to, the goals, the ball, corner flags etc.
11. Wear, use or lend the mascot uniform at any time without the express consent of the club
12. Engage in any behaviour that is likely to cause offence or distress to any individual or sections of the crowd
13. Operate around the area where the opposing fans are situated
14. Throw anything of substance into the crowd including but not limited to water or other liquids This Code of Conduct is extensive but not exhaustive and mascots should be aware that if their behaviour is found to be unacceptable, they may be released from their role.

Note: It is important to recognise that The Football Authorities; Official Leagues; The Football Association and Peterborough United Football Club will not tolerate conduct that is detrimental to the sport, the participants, the spectators, the officials or the community. Such conduct includes (but is not limited to) vulgarity, lewd acts, harassment, racism, sexism, physical violence or threat of physical violence, verbal abuse, taunting, or any other anti-social behaviour. Safeguarding Contacts Any immediate concern or potential risk should be reported to the match day Safeguarding Officer.

# CLUB SAFEGUARDING POLICY

## CREATING A SAFE ENVIRONMENT FOR EVERYONE



### Appendix 8 – Guidance for parents

The current generation are growing up with the internet as part of their everyday lives. It is a great place for them to learn, have fun and to stay in touch however it is important to make sure that they are safe while they do it.

As access to the internet from various devices increases, it is therefore vital that as parents/guardians and relevant others we increase our knowledge to combat online threats of harm.

There is information available for you to help keep children, young people or adults at risk safe online: visit <https://www.net-aware.org.uk> for an introduction.

You may also want to have a look at the Child Exploitation and Online Protection Centre's guide to the internet for parents and carers: <https://www.thinkuknow.co.uk>

Most social media platforms have a lower age limit of 13 years of age before a person can interact with them. This is to prevent them from being exposed to potentially inappropriate content. In May 2018, WhatsApp raised the minimum user age to 16 years of age.

A full list of the relevant minimum ages can be found at; <https://www.internetmatters.org/resources/what-age-can-my-child-start-social-networking/>

It is important for you to understand who your child is interacting with online and this includes our staff and volunteers.

It will also be best practice for staff to communicate with your child in a group message setting where all messages remain transparent and accountable. The messages should always be football related and staff should always act professionally. You should provide the Club with consent for such communication and all messages should be visible to you.

There may be occasions where staff are required to contact directly with the 16–18-year-old group. These situations are expected to be in exceptional circumstances and you or a relevant other should always be copied in at the time. Any contact outside of these guidelines will be viewed with suspicion and may be subject to a safeguarding investigation.

The Club are committed to ensuring that we adhere to best practice to reduce the risk of attachment and grooming by those in a position of trust.

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If you have any concerns about these matters, you are encouraged to contact the Designated Safeguarding Team

Senior Safeguarding Manager – [bob.symns@theposh.com](mailto:bob.symns@theposh.com)  
Club Welfare officer – [liz.elsom@theposh.com](mailto:liz.elsom@theposh.com)  
Academy Safeguarding/ Player Care – [Kayleigh.stent@theposh.com](mailto:Kayleigh.stent@theposh.com)  
Designated Safeguarding Officer – [james.baum@theposh.com](mailto:james.baum@theposh.com)  
Designated Safeguarding Officer – [matthew.dye@theposh.com](mailto:matthew.dye@theposh.com)  
Designated Safeguarding Officer – [ryan.semple@theposh.com](mailto:ryan.semple@theposh.com)  
Designated Safeguarding Officer – [elio.salerno@theposh.com](mailto:elio.salerno@theposh.com)  
Designated Safeguarding Officer – [paolo.difabrizio@theposh.com](mailto:paolo.difabrizio@theposh.com)

Written by: Kayleigh Stent  
Academy Safeguarding and Player Care Manager

Authorised by:  
Liz Elsom  
Club Welfare Officer

Signed off by:  
Bob Symns  
Senior Safeguarding Manager  
&  
The Peterborough United Board

Date written: 14.04.2021

Updated: 13.08.2021

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**Appendix 9 – Information Communication Technology Policy**

Date Written: 01.07.2018  
Updated: 01.07.2019  
Updated: 04.07.2020  
Updated: 10.10.2020  
Updated: 01.01.2021  
Updated: 13.08.2021

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

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

**E-MAIL AND INTERNET**

**Introduction**

The purpose of the Internet and E-mail policy is to provide a framework to ensure that there is continuity of procedures in the usage of internet and e-mail within the Company. The internet and e-mail system have established themselves as an important communications facility within the Company and have provided us with contact with professional and academic sources throughout the world. Therefore, to ensure that we are able to utilise the system to its optimum we have devised a policy that provides maximum use of the facility whilst ensuring compliance with the legislation throughout.

**Internet**

Where appropriate, duly authorised staff are encouraged to make use of the Internet as part of their official and professional activities. Attention must be paid to ensuring that published information has relevance to normal professional activities before material is released in the Company name. Where personal views are expressed a disclaimer stating that this is the case should be clearly added to all

correspondence. The intellectual property right and copyright must not be compromised when publishing on the Internet. The availability and variety of information on the Internet has meant that it can be used to obtain material reasonably considered to be offensive. The use of the Internet to access and/or distribute any kind of offensive material, or material

## CLUB SAFEGUARDING POLICY

### CREATING A SAFE ENVIRONMENT FOR EVERYONE



that is not work-related, leaves an individual liable to disciplinary action which could lead to dismissal.

#### **Procedures – Acceptable/Unacceptable Use**

- Unauthorised or inappropriate use of the internet system may result in disciplinary action which could result in summary dismissal.
- The internet system is available for legitimate business use and matters concerned directly with the job being done. Employees using the internet system should give particular attention to the following points:

i) comply with all of our internet standards;

ii) access during working hours should be for business use only;

iii) private use of the internet should be used outside of your normal working hours.

c) the Company will not tolerate the use of the Internet system for unofficial or inappropriate

purposes, including:

i) accessing websites which put our internet at risk of (including but not limited to) viruses, compromising our copyright or intellectual property rights;

ii) non-compliance of our social networking policy;

iii) connecting, posting or downloading any information unrelated to their employment and in

particular pornographic or other offensive material;

iv) engaging in computer hacking and other related activities, or attempting to disable or compromise security of information contained on the Company's computers.

You are reminded that such activities (iii. and iv.) may constitute a criminal offence.

#### **E-mail**

The use of the e-mail system is encouraged as its appropriate use facilitates efficiency. Used correctly it is a facility that is of assistance to employees. Inappropriate use however causes many problems including distractions, time wasting and legal claims. The procedure sets out the Company's position on the correct use of the e-mail system.

#### **Procedures – Authorised Use**

- unauthorised or inappropriate use of the e-mail system may result in disciplinary action which could include summary dismissal.
- the e-mail system is available for communication and matters directly concerned with the

**CLUB SAFEGUARDING POLICY**  
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legitimate business of the Company. Employees using the e-mail system should give particular attention to the following points:

- i) all comply with Company communication standards;
- ii) e-mail messages and copies should only be sent to those for whom they are particularly relevant;
- iii) e-mail should not be used as a substitute for face-to-face communication or telephone contact.

Abusive e-mails must not be sent. Hasty messages sent without proper consideration can cause upset, concern or misunderstanding;

- iv) if the e-mail is confidential the user must ensure that the necessary steps are taken to protect

confidentiality. The Company will be liable for infringing copyright or any defamatory information that is circulated either within the Company or to external users of the system; and

- v) offers or contracts transmitted by e-mail are as legally binding on the Company as those sent

on paper.

- c) The Company will not tolerate the use of the e-mail system for unofficial or inappropriate purposes, including:

- i) any messages that could constitute bullying, harassment or other detriment;
- ii) personal use (e.g. social invitations, personal messages, jokes, cartoons, chain letters or other

private matters);

- iii) on-line gambling;

- iv) accessing or transmitting pornography;

- v) transmitting copyright information and/or any software available to the user; or

- vi) posting confidential information about other employees, the Company or its clients or suppliers.

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**Monitoring**

We reserve the right to monitor all e-mail/internet activity by you for the purposes of ensuring

compliance with our policies and procedures and of ensuring compliance with the relevant regulatory requirements. This includes monitoring of any additional accounts you may be requested to set up for the

purposes of performing your work tasks, which are subject to the same rules as your work email account.

Information acquired through such monitoring may be used as evidence in disciplinary proceedings.

**USE OF SOCIAL NETWORKING SITES**

Any work related issue or material that could identify an individual who is a client or work colleague,

which could adversely affect the Company, a client or our relationship with any client must not be placed

on a social networking site. This means that work related matters must not be placed on any such site at

any time either during or outside of working hours and includes access via any computer equipment or mobile device.

Any work content or material, or contacts or connections list, created by you during the course of your employment, on any of your authorised social networking sites (ownership of which vests in the

Company) shall remain, at all times, the property of the Company. Accordingly, upon termination of your employment, you shall hand over to the Company, the access rights to your accounts, together with any work content or material, and any contacts or connections list.

Please also read the and understand the Information Security Policy



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**Appendix 10 – Missing Person / Late Collection Policy**

Date Written: 01.07.2018  
Updated: 01.07.2019  
Updated: 04.07.2020  
Updated: 10.10.2020  
Updated: 01.01.2021  
Updated: 13.08.2021

At Peterborough United Football Club, we follow the outlined missing person's procedure:

- Ensure the safety and supervision of the rest of the group
- Retake the register
- Inform the police
- Contact their parent / guardian if necessary
- Inform a member of the Safeguarding Team
- Ensuring the safety of the rest of the group, do a controlled local search
- Remain calm
- Record the incident in an email and submit to a member of the Safeguarding team

**First Team Match Day's**

At Peterborough United we have a fixed safety team who oversee all first team match days to ensure the safety of all children and vulnerable adults while at our stadium.

When a child or vulnerable person is found not to be at the point that they should be the PUFU protocol is as follows:

- Notify a steward.
- Steward to notify their stand supervisor.
- Supervisor to complete 'missing person's questionnaire'
- Supervisors to pass through all information to Safety 1 who is based within the control room.
- Safety 1 will notify the match day safeguarding officer who will proceed to the control to work alongside Safety 1.
- Based on the information gathered safety 1 will action the match day 'missing persons' contingency plan. (this can be seen upon request)

## CLUB SAFEGUARDING POLICY

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#### **Late collection of a child/ children – Monday to Sunday**

##### **Rationale**

If an authorised person does not collect a child/ child, our aim is to resolve the situation causing as little distress to the child/ children as possible.

##### **Procedures**

We keep all the names and telephone numbers of the adults who are authorised to collect the child from any Peterborough United activity.

If we are informed, you are late then two members of staff will remain with your child/children.

We would also hold any information about any person who has been denied legal access to the child / children, this will be communicated out to staff accordingly in writing.

If there is a change to the proceedings of the collection of a child/ children we ask parents to notify us immediately.

##### **What will happen if the Club are unable to contact someone to collect the child?**

If the procedure fails to locate an authorised adult to collect the child / children and they have not been collected with 1 hour of the Peterborough United activity finishing the senior member of staff onsite will contact one of the safeguarding team, who will attend site and contact social services. Two members of staff will then accompany the child / children there. Social service will then take over from the Football Club. Under no circumstances will staff of looking for the authorised adult or take the child home. A full report of the incident will be written up and issued Safeguarding Team, who will place it on the child's/ children's file.

#### **First Team Match Day**

##### **Missing children and vulnerable adults;**

The purpose of this procedure is to ensure that children or vulnerable adults 'lost' or 'missing' during a fixture are taken to a place of safety, under the supervision of responsible suitably 'vetted' persons who are aware of how to cope with young children or vulnerable adults.

Peterborough United will provide a manned lost person point throughout the fixture. Peterborough United's lost person point is 'Reception' in the main stand. Reception is staffed during the entire event by receptionists, controlled by CCTV, stewarded at all points and this is where a Safeguarding employee is situated (or can be upon notification).

In order to safeguard the welfare of a lost/found child or vulnerable adult and to protect members of Peterborough United staff (employees, contractors or agency staff), the following protocol is provided as guidance which should be in place at all events.

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Peterborough United will make sure that all members and volunteers know where to take a child or vulnerable adult who have lost their parent or the person looking after them.

The agreed Collection Point will be available during all fixtures (Reception) which does have access to a telephone which in turn can be used to contact Control Room where the safety team have access to the venues PA system.

In the event of the above, the match day safeguarding officer must be contacted immediately. They will attend the point as mentioned where they will have a list of contacts (e.g. police, medical, control room, Safety Team etc.).

If lost children, parents separated from their children, vulnerable adults or carers of vulnerable adults arrive at other points or speak to Peterborough United employee's, Stewarding Staff or volunteers, they should be directed or taken to the Collection Point as appropriate.

Once a child or vulnerable adult has been re-united with their collecting adult the event organiser, all members attending, and police will be informed immediately.

#### **Children or Vulnerable adults found without their parents;**

A child or vulnerable adult appearing to be lost should be approached and asked if they know where their parents/guardian/carer are.

If a child or vulnerable adult still appears to be lost, they should be led to the Collection Point and the match day safeguarding officer will be contacted. They will be encouraged to remain at the collection point until they have been re-united with a parent or guardian. The safeguarding officer will remain with them.

The child or vulnerable adult should gently be asked for as much information as possible, including, their name, who they are with, their parents/guardians/carer's/brother etc. names, where they last saw them and a description of them. If the child is brought over by another adult, as much information as possible should be gained from them.

The information will be given to the Control Room who might decide an announcement over the PA system.

If the parent/guardian/carer's name is known an announcement will be made via the PA system "This is a public announcement, could ..... (Name of person) please come to the Reception located at the Main Stand".

If the name of the parent /guardian /carer is not known the following announcement will be made via stage PA systems "This is a public announcement, please remember this is a busy event, if you have been separated from a family member, then please go to Reception located in the Main Stand".

The PA announcement should not mention the name of the lost child or vulnerable adult.

The child or vulnerable adult should be kept in an area out of public view, where they will await collection.

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Never use the word 'Missing Child' etc within the hearing of the public as this could cause panic; always use the code words: **"MR PHOENIX - CODE MOSCOW"**.

If a parent/guardian/carer is not located within a set time based on the size of the venue, the vulnerable adult, or the age of the child, the Safeguarding officer will inform the police.

Depending where the child/vulnerable adult came from within the stadium, response teams will be deployed to the stand in question. An initial search will be conducted of the area where the visibility of staff needs to be maximised to promote an opportunity for a parent/guardian to engage with staff.

### **Parent/ Guardian reporting lost children;**

Staff should reassure parents/guardians and/or carers who are making a notification of a lost child that a search will be organised via the Safety Team.

Staff encourage the parent to come to the Reception in the Main Stand if not already there, so they can give details to the match day safeguarding officer.

Ask them for the following details of the child or vulnerable adult – name, age, sex, ethnic origin, hair colour, build, clothing, location last seen and who they were with.

Parents/guardians and/or carers should be Encourage the parent to regularly return to the Reception Desk if they continue to search for the child in case the child is found.

To prevent any communication issues, a telephone number needs to be obtained. In return, a telephone number should be also provided. This needs to be conducted so both parties can share information if one party finds the child.

Using the code word "CODE MOSCOW" to communicate a message to the Safety Team giving the information gathered.

Staff and volunteers will conduct an initial search of the area. Response Teams will be deployed starting from the last known location and then branching out to the entire stand.

All staff at ALL exit points need to be informed of the situation with a description. Any child matching the description must be approached.

A LOCK-DOWN procedure must be considered for part of or all of the stadium. This will mean that the exits will be closed, preventing the possibility of that lost individual leaving the site.

CCTV will be used, and operators must be proactive.

The 4<sup>th</sup> official must be notified. Although this isn't a fixture related problem, the 4<sup>th</sup> official should be informed as they have knowledge that the Safety Team are dealing with an incident of importance and therefore may not have available to them what was discussed during initial briefings.

A photo would be useful from the person who is informing staff of the lost person. That picture should be shared by private message to ALL supervisors.

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In the future, Peterborough United is hoping to obtain a 'Event Management' system which will allow Supervisors to share images.

When the child or vulnerable person is found, they will be led to the Reception in Main Stand to be reunited with their parent or carer. The match day safeguarding officer must be informed.

If a child or vulnerable person is not found within a set time based on the size of the venue, the vulnerable adult, or the age of the child, the match day safeguarding officer will inform the police.

A time limit not in the procedure. Reason being is that a 15-year child who has been separated from a parent will be street wise and familiar with being unaccompanied would not necessarily obtain the same level of response as a 15-year-old with medical, learning, or mental health issues.

The Safety team will need to assess the situation and record why (or why not) the Police need notification, this decision needs to involve the match day safeguarding officer.

In cases where an individual under the age of 10 has been reported, the Police will be notified regardless. The Police would much rather be called, and then cancelled should they be found than not at all.

If the Police are on site, they should be informed immediately regardless of the circumstances.

#### **Re-Uniting parent/guardian with children/vulnerable adults;**

When an adult (or older child) arrives to collect the 'lost' child, they should not be able to 'view' the child(ren) held for safety.

They should be required to provide details – name, age, address, who they are in relation to the child (including name), and a description of the child's appearance and clothing. Many adults nowadays will have photos of those involved on mobile phone devices.

Should there be any reservations about releasing the child they should request The Safety Team and or match day safeguarding officer is to contact a Police Officer for assistance.

If the individual is an older child, and staff are not convinced they will ensure the child's safety, then you should hold the child until an adult can be contacted. For example, an older Brother under the responsible age attends Reception.

If a child or vulnerable adult is reluctant to go with a collecting adult, then the adult should be asked for proof of ID and their signature. If necessary, the police should be advised on any problems.

Peterborough United hold separate Safeguarding policies/procedures.

Every situation is different and although Peterborough United have a contingency plan, everyone has to be open to other situations which may present themselves. Children's ages, background, race, financial background, exposure to harmful substances etc etc.

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Everyone has a different background and staff will be open to other considerations in terms of safeguarding. If it doesn't seem right – staff should raise their concerns.

### **Lost Person log;**

Details of all children or vulnerable adults delivered to the Reception should be recorded to provide as much information as possible (dependent upon the age of the child) - details should include their name, age, address, who they are with (preferably a name, but if not their relationship).

A register of all reporting to the post is essential with the full documentation on how the cases were resolved (eg. Child handed back to parents etc. and signed off).

The Event Log needs to be updated.

### **Lost Person Report;**

A lost reports report is available for Staff at reception and Control Room and staff should be encouraged to complete all the relevant questions.

### **Unaccompanied children on match days;**

Peterborough United have the following ticket strategy in place in relation to allowing unaccompanied children at the stadium on match days.

Clubs across the country have different views on the age in which is acceptable for unaccompanied children. Peterborough United's is as follows:

Any child between the age of 12-15, must be accompanied by a paying 16yr old or older at all times.

Anyone under the age of 12 must be accompanied by a paying adult.

As above, although this is a plan – different children will present different concerns and staff need to be open minded when challenging situations and must raise the alarm if they have any concerns. Safeguarding is key and Peterborough United must do the right thing for protecting the vulnerable.

### **Lock-down procedures;**

On occasions where a Missing Child or Vulnerable adult is missing, Peterborough United via the Safety Team will and must consider closing areas of the stadium. This will be dependent on where, when and what time the missing individual is reported.

All the exit gates are closed during the fixture. However, on occasions, the gates are opened earlier than expected.

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An example would be:

Peterborough United are 3-0 up and during the third goal at 72 minutes, many away fans decide to leave due to the prospects of a win being slim. If at that moment, a 6-year-old missing individual is

reported, it may be decided that the exit gates of A/B in the Main Stand are closed. In particular, the fan zone gates.

Response Teams and Supervisors for that area will be updated via the normal methods.

If a lock-down was to be performed, the key to a successful operation is 'communication'. People do not mind being disrupted if the reasons why are communicated. This can be done verbally to those attempting to leave.

The fact that a lock-down has been performed in certain area's does not naturally need to be announced over the PA system. This could create unnecessary panic. That decision will be based on individual circumstances.

CCTV will be key in these circumstances and the area's affected will need to be staffed accordingly.

It may be that although a lock-down is performed, people could still leave. If two individuals were leaving who were not in the presence of a young child, that could be deemed safe. However, if a mass crowd were leaving, a lock-down would be beneficial and will assist with the protection of that missing individual and will increase the chances of that individual not leaving the stadium and becoming lost off the footprint.

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### Appendix 11 – Prevent Policy

Date Written: 04.05.2020  
Updated: 13.08.2021

Peterborough United Football Club recognises and promote the importance of British values. It is key to build resilience to radicalisation on every level throughout the Football Club allowing every child, young person and/or venerable adult from diverse and ethnic backgrounds to reach their full potential, to be safe and protected and to stop people being drawn into supporting terrorism. The Football Club also seeks to stop the development of a rigid and narrow ideology that is intolerant of diversity, British values and which, ultimately, leaves them vulnerable to future radicalisation.

In 2015, all schools and childcare providers were required under section 26 of the Counter Terrorism and Security Act 2015, to have due regard to the prevention of people from being drawn into terrorism. All agencies that have direct contact with children, young people and venerable adults must adhere to the prospect of preventing radicalisation.

Peterborough United is responsible for the welfare of all children, young people and venerable adults that are involved in any Club activity.

Extremism is defined as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect, as well as the tolerance of deferent faiths and beliefs.

There is no such thing as a 'typical extremist'. Those who become involved in extremism do so from a wide-ranging mix of backgrounds and experiences. It should be accepted that many who hold extremist views do not go on to become involved in violent extremist activity.

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideology. Radicalisation can take place in several ways, though recent emphasis has been placed on the role of the internet in the process as well as the influence of powerful direct relationships on an individual.

The general risks affecting children, young people and venerable adults may vary from area to area, and according to their age. There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology and as with managing other safeguarding risks, Club personnel should be alerting to changes in children's, young people and venerable adults' behaviour that could indicate that they may be in need of help or protection. That said there are acknowledged signs that may be of use as an indicator such as underachievement, possession of extremist literature, social exclusion, individual traumatic events, religious conversion or zealotry, intolerance, referencing extremist ideology or



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views as well as influences, family conflict, confused identity issues or being the victim or witness to race or hate crimes.

Peterborough United Football Club will provide training to its staff and volunteers in recognising, grooming in radicalisation behaviour. Training will be delivered in partnership with key organisations such as the Counter Terrorism Police on an annual basis.

**Procedure**

If there is any concern that a person is or may be exposed to or at risk in respect of radicalisation, you must refer this to the Safeguarding Lead as a priority. The Safeguarding Lead will report this to the appropriate authorities.

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**Appendix 12 – Safer Recruitment Policy**

Date Written: 01.07.2018  
Updated: 01.07.2019  
Updated: 04.07.2020  
Updated: 10.10.2020  
Updated: 01.01.2021  
Updated: 13.08.2021

**Aim**

To set out the minimum requirements of a recruitment process that aims to:

- Attract and select the best possible applicants to vacancies
- Deter Identify and reject prospective applicants who are unsuitable for work with children or young people
- Meet statutory requirements of the Equality Act 2010
- Treat all applicants fairly and clearly.

**Procedures**

At Peterborough United Football Club, we are vigilant in our recruitment procedures.

We follow this procedure every time we recruit a new member to our team.

**Identification of recruiting panel**

- We have a minimum of two people on our recruiting panel. The same two people are involved at each step of the recruitment process.
- At least one member of the panel will have attended training in safe recruitment procedures.

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### Advertising

- We use the Peterborough United website to advertise any new vacancies
- Recruiting Managers will also consider the below outlets for advertising vacancies (free of charge), to address under representation in our workforce:
  1. Kick It Out ([info@kickitout.org](mailto:info@kickitout.org))
  2. Level Playing Field ([info@levelplayingfield.org.uk](mailto:info@levelplayingfield.org.uk))
  3. Women in Football ([jobs@womeninfootball.co.uk](mailto:jobs@womeninfootball.co.uk))
  4. Pink Jobs ([Click Here](#))
  5. Sporting Equals ([Click Here](#))
- All our adverts include a 'recruitment and selection policy statement' which gives details of our equal opportunities policy and safe recruitment procedures

Peterborough United is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. All applicants are subject to a satisfactory enhanced Criminal Records Bureau disclosure and at least two independent references.

### Job application pack / recruitment materials

- Any person enquiring about the post will be supplied with a job application pack which as a minimum, will include:
  - o Job description/person specification and advert
  - o A copy of our recruitment and selection policy (this document)
- All applicants must complete a minimum of a CV and cover letter, specific to the job for which they are applying.
- Alternative formats can be provided upon request and any access requests for interview should also be raised at the application stage.

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### Short-listing

- We shortlist all candidates against the person specification for the post.
- We ensure all applicants receive correspondence regardless of whether they are successful in reaching the interview stage or not.
- We welcome applications from all sections of the community. Applicants will be considered on the basis of their suitability for the post, regardless of their marital status, age, gender identity, ethnicity, religious belief, disability or sexual orientation.

### Interview stage

- Interviews will always be face to face.
- A minimum of two people, usually the manager and the deputy, will sit on the interview panel. Both will be involved in the overall decision making.
- At the interview, each candidate will be required to prove their identity against photo ID (for example a passport, birth certificate or driving licence) and also produce documents to prove they are eligible to work in the UK.
- At the interview, candidates will be questioned using the same set criteria and same questions. The questions will be formulated from the essential criteria listed in the person specification.
- Candidates will always be required

∅ to explain satisfactorily any gaps in employment

∅ to explain satisfactorily any anomalies or discrepancies in the information available

∅ to declare any information that is likely to appear on a CRB disclosure

∅ to demonstrate their capacity to safeguard and protect the welfare of children and young people

- Each shortlisted candidate may be asked to take part in a practical exercise, where relevant to the role (e.g. coaching).
- The manager and deputy will then select the most suitable person for this position based on these scores and their knowledge and understanding.
- Each candidate will receive communication stating whether they have been successful or not.
- Any adjustments for interview will be accommodated, where possible.

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### Employment checks

- The successful candidate will be offered the position subject to at least two references from previous employment or in the case of a newly qualified student, their tutor and a personal or professional reference. These references will be taken up BEFORE employment commences.
- Referees will be sought directly from the referee. References or testimonials provided by the candidate will never be accepted.
- Referees will always be asked specific questions about

∅ the candidates suitability for working with children and young people

∅ any disciplinary warnings, including time expired warnings that relate to the safeguarding of children

∅ the candidates suitability for the new post

- The successful candidate will be subject to an enhanced Disclosure and Barring Service (DBS) check whether they currently hold an enhanced CRB or DBS check or not, if they are to be undertaking regulated activity. This will be initiated before the member of staff commences work and they will not have **unsupervised** access to any child or their records before this check comes back clear.
- All qualifications will be checked against actual certificates and copies taken for their personnel files.

### Induction

- For all new staff, a clearly written and structured induction programme is in place. The programme includes training, shadowing and opportunities to read and discuss the club's policies and procedures.
- As a minimum, new staff member will be provided with a copy of the following:
  1. Equality Policy
  2. Safeguarding Policy
  3. Health and Safety Policy
  4. Staff Handbook
- An induction plan sets out what new staff members will cover before beginning work and during the induction period.
- Throughout the induction period, all new staff members will receive regular meetings with the manager and their mentor to discuss how it's going and identify any further training and development needs.

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- Any reasonable adjustments to the working environment or working pattern should be discussed with the manager during the induction period.

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**Appendix 13 – Social Media Guidance for Young People and Vulnerable Adults Policy**

The internet is a great place to learn and to have fun and stay connected to your friends. The best way to have fun is to make sure that you stay safe.

When you use the internet, social media and apps you should think about the below to keep yourself safe:

- If someone is not your friend in real life, they are not your friend on the internet.  
**Be careful when accepting friend requests.**
- Sometimes people on the internet are not who they say they are  
**If you are not 100% sure, do not risk it. Talk to an adult if you are worried**
- Remember to change your privacy settings so that only your friends can see information about you, your social media posts, and especially your photos.
- If someone is sending you messages or texts that you are uneasy about make sure you tell your parents, or an adult you trust.
- Remember that Peterborough United Football Club staff are professionals, just like your teachers. They should not be your friend on social media and should not be texting or messaging you directly.
- You can expect Club staff to plan activities via your parents or within group messages.
- You should not contact staff on their personal telephone numbers.
- Bullying can happen online too, and it is known as cyber-bullying. If you, or someone you know, has had this happen to them you should tell an adult that you can trust.
- Do not send or forward any indecent image of yourself, someone you know or any other. Even though it may seem like fun at the time this could have future consequences for yourself and cause unhappiness.
- Report any indecent image or video footage to the Internet Watch Foundation - they can have these removed <https://www.iwf.org.uk>

**Above everything do not be frightened to tell someone if you are worried or concerned by any online issue or messages.**

Remember to use [www.kooth.com](http://www.kooth.com) as a supportive resource – there are people there who can help and advise you.

Have a look at the Think You Know page on the internet for more information about staying safe online: <http://www.thinkuknow.co.uk>

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You can email Designated Safeguarding staff in confidence:

- Senior Safeguarding Manager – [bob.symns@theposh.com](mailto:bob.symns@theposh.com)
- Club welfare officer – [liz.elsom@theposh.com](mailto:liz.elsom@theposh.com)
- Academy safeguarding and player care manager – [Kayleigh.stent@theposh.com](mailto:Kayleigh.stent@theposh.com)
- Designated Safeguarding officer – [james.baum@theposh.com](mailto:james.baum@theposh.com)
- Designated Safeguarding officer – [matthew.dye@theposh.com](mailto:matthew.dye@theposh.com)
- Designated Safeguarding officer – [ryan.semple@theposh.com](mailto:ryan.semple@theposh.com)
- Designated Safeguarding officer – [elio.salerno@theposh.com](mailto:elio.salerno@theposh.com)
- Designated Safeguarding officer – [paolo.difabrizio@theposh.com](mailto:paolo.difabrizio@theposh.com)

Written by: Kayleigh Stent  
Academy Safeguarding and Player Care Manager

Authorised by:  
Liz Elsom  
Club Welfare Officer

Signed off by:  
Bob Symns  
Senior Safeguarding Manager  
&  
The Peterborough United Board

Date written: 14.04.2021  
Updated 13.8.2021



# CLUB SAFEGUARDING POLICY

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### Appendix 14 – Social Media Guidance for Staff

All Peterborough United staff including part time staff and volunteers are reminded that the relevant Codes of Conduct apply online and in text and email communications. Breaches of these codes may result in disciplinary action being taken.

#### **Social Media**

Social Media, when used properly, is enjoyable and opens a lot of opportunities for the Football Club. Through following the Club's simple guidelines and procedures potential downsides and risks can be avoided. Social Media can be safely used as an effective means of communication and engagement. As well as being a fun way to relax and stay in touch with friends. It is also of the utmost importance to keep personal and business matters separate.

Peterborough United advise that staff adjust their privacy settings for your personal accounts so that their personal content is only visible to accepted 'friends'. All social media posts should follow with Club values and every effort should be made to reduce occasions when they may be misinterpreted by the public. This will reduce the risk of you attracting complaints which may result in unnecessary investigation. All employees and volunteers at the Football Club are viewed as role models and they should behave so accordingly.

All staff are to ensure that any social media post you make could not cause personal distress or be viewed as inappropriate for children.

All staff should always have specific consent before posting any personal information online – this includes photographs where an individual can be identified. Parental/ Guardian consent is provided for official Club use and not for the use of individuals. Whilst we wish to celebrate success as a Club please ensure that your posts, pictures and information is compliant with this policy.

Children, young people and adults at risk may consider you as a friend and on occasions you may receive 'friend requests' through social media platforms. It is imperative that you do not accept such requests nor message through social media tools or apps with an explanation why you are unable to. This breaches the Club Safeguarding Code of Conduct and may put your position within the Club in risk.

What may be well intentioned friendly contact this may not be considered the case by parents, staff at the Club or the Local Authority who determine whether people are safe to work with children.

# CLUB SAFEGUARDING POLICY

## CREATING A SAFE ENVIRONMENT FOR EVERYONE



### Messaging children, young people, or adults at risk via texts, apps and emails:

It is inappropriate and often unnecessary for staff, and those in a position of trust, to communicate with children on a one-to-one basis via:

- text message
- e-mail
- instant messaging or through social networking sites

All communications with Under 16's should have the consent of parents and be sent in group messages rather than single messages to individuals.

The Club understands that there may be occasions where direct contact may be needed between Club staff and the 16–18-year-old Academy group. In these situations, staff should ensure that consent from parents is in place.

This will help aid the protection of staff from allegations of inappropriate contact and grooming activity.

Any messages sent directly to children outside of these guidelines will be viewed by the Club with suspicion and may result in a disciplinary investigation.

This guidance also applies to e-mails which should always be sent from work rather than individual accounts.

All contact must relate to Club activity and your own personal details should never be discussed. Discussions with children, young people, or adults at risk about your own personal relationships or any personal difficulty will never be accepted by the Club as acceptable.

Every contact with children, young people, or adults at risk should be transparent and accountable.

### If you have concerns regarding social media, texts, and emails.

If you suspect that someone is using social media or messages in an unsafe or inappropriate manner, you should report this to your Line Manager or a member of the Designated Safeguarding team in line with the Club policies. This will be considered as a confidential concern and treated by staff as a neutral act.

Senior Safeguarding Manager – [bob.symns@theposh.com](mailto:bob.symns@theposh.com)

Club Welfare officer – [liz.elsom@theposh.com](mailto:liz.elsom@theposh.com)

Academy Safeguarding/ Player Care – [Kayleigh.stent@theposh.com](mailto:Kayleigh.stent@theposh.com)

Designated Safeguarding Officer – [james.baum@theposh.com](mailto:james.baum@theposh.com)

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Designated Safeguarding Officer – [matthew.dye@theposh.com](mailto:matthew.dye@theposh.com)  
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Authorised by:  
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Signed off by:  
Bob Symns  
Senior Safeguarding Manager  
&  
The Peterborough United Board

Date written: 14.04.2021

Updated: 13.08.2021

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**Appendix 15 – Transport Policy**

Date Written: 01.07.2018  
Updated: 01.07.2019  
Updated: 04.07.2020  
Updated: 10.10.2020  
Updated: 01.01.2021  
Updated: 13.08.2021  
Updated: 28.09.2021

As a primary source of transport Peterborough United use Club minibuses for the transport of Players and Staff, these vehicles are serviced regularly to ensure that they meet the road safety standards as the safety of our players is of paramount to the Club.

When it is not possible to use Club minibuses or extra room is required cars may be used to transport players. Where a member of staff is present in the car, they will hold a full FA DBS and UK driving licence with business insurance.

At Peterborough United we ensure that on these occasions there will be more than one member of staff present to ensure the welfare of the young person is not compromised.

Players in the Full Time Training Model (FTTM) in the Youth Development Phase (Under 12 – Under 16) will be met, if required, by the club minibus at Peterborough Train Station every morning and will be transported to the Training Ground. At the end of the day, the club minibus will collect the players from the Training Ground and return them to the Train Station. The duty of care for Peterborough United starts and ends at Peterborough Train Station.

Should the club provided minibus be unavailable, taxis will be organised through a Club preferred company. This information will be circulated out to parents via the transport parent app. A member of staff will always be present at the station for collections to deal with any issues should they arise. Should a player be running late, parents are to let the Youth Development Phase Lead Coach and the school know as soon as possible.

All Foundation Phase and Youth Development Phase players are required to make their own way to training and games. In unusual event that Foundation Phase players would need club transport, the above will apply.

All members of staff that drive company vehicles are required to present the appropriate Club personnel with the relevant driving documents and complete the driver registration pack. These documents will be held electronically in a secure file and only members of staff who have completed the relevant steps will be permitted to drive company vehicles.

## CLUB SAFEGUARDING POLICY

### CREATING A SAFE ENVIRONMENT FOR EVERYONE



All parents/guardians of players in the Peterborough United transport policy and the relevant steps that are taken to ensure the safety of the players when travelling in Club vehicles. Academy are made aware of the

Parents/guardians are also made aware that it is their responsibility to ensure that if players are using other modes of transport i.e public transport that it is their responsibility to ensure the safety of the player.

All parents/guardians are required to complete and sign the transport agreement that is in place with Peterborough United to show that they have read, understand and agree the transport procedures put in place by Peterborough United Football Club.

Within the Peterborough United Club transport policy, drivers are made aware that in the event of road traffic incident that causes damage or injury to another person, vehicle, animal or property they must give both their own and the vehicle owners name and address, along with registration number of the vehicle, to any having reasonable grounds for requiring them. Also in the event of an accident, insurance details are to be provided if required by others involved in the incident, in the event that damage is caused by another motorist to a Peterborough United Club vehicle or injury is sustain by Club staff/players travelling in these vehicles insurance details must be gathered from the other party involved in the incident.

In the event that details are not provided at the scene of the incident it is required that the accident is reported to the Police as soon as possible or at least within 24 hours.

All individuals driving on Peterborough United Football Club business in club vehicles or independent transport must not under any circumstance use hand held mobile phones or any other electronic equipment whilst driving or under the influence of drug or alcohol substance

In the event that an individual is prosecuted for such offence Peterborough United will implement the relevant disciplinary actions.

In the event that an individual is prosecuted for such offence Peterborough United will implement the relevant disciplinary actions.

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**Appendix 16 – Whistle Blowing Policy**

Date Written: 01.07.2018  
Updated: 01.07.2019  
Updated: 04.07.2020  
Updated: 10.10.2020  
Updated: 01.01.2021  
Updated: 13.08.2021

**A) INTRODUCTION**

Under certain circumstances, employees are protected from suffering any detriment or termination of employment if they make disclosures about organisations for whom they work.

**B) QUALIFYING DISCLOSURES**

1) Certain disclosures are prescribed by law as “qualifying disclosures”. A “qualifying disclosure” means a disclosure of information that the employee genuinely and reasonably believes is in the public interest and shows that the Company has committed a “relevant failure” by:

- a) committing a criminal offence;
- b) failing to comply with a legal obligation;
- c) a miscarriage of justice;
- d) endangering the health and safety of an individual;
- e) environmental damage; or

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f) concealing any information  relating to the above.

- 2) These acts can be in the past, present or future, so that, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen. The Company will take any concerns that you may raise relating to the above matters very seriously.
  
- 3) The Employment Rights Act 1996 provides protection for workers who 'blow the whistle' where they reasonably believe that some form of illegality, injustice or breach of health and safety has occurred or is likely to occur. The disclosure has to be "in the public interest". We encourage you to use the procedure to raise any such concerns.

#### C) THE PROCEDURE

- 1) In the first instance you should report any concerns you may have to the Chief Executive Officer who will treat the matter with complete confidence. If you are not satisfied with the explanation or reason given to you, you should raise the matter with the appropriate official organisation or regulatory body.
- 2) If you do not report your concerns to the Chief Executive Officer you should take them direct to the appropriate organisation or body.

#### D) TREATMENT BY OTHERS

Bullying, harassment or any other detrimental treatment afforded to a colleague who has made a qualifying disclosure is unacceptable. Anyone found to have acted in such a manner will be subject to disciplinary action.

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**Appendix 17- Risk Management Policy**

Written by Kayleigh Stent

Signed off by Bob Symns

Date written 30.04.2021

Updated: 13.08.2021

1. The purpose of the risk management policy is to provide guidance regarding the management of risk to support the achievement of company objectives, protect staff and Club assets, and ensure financial sustainability.
2. The policy to all Peterborough United activities, if forms part of Peterborough United's governance framework and it applies to all employees, contractors and volunteers.
3. Risk governance;
  - **Board;**
    - Provides policy, oversight and review of risk management
  - **Heads of departments;**
    - Overseas regular reviews of risk management activities
  - **CEO & SSM;**
    - Drives culture of risk management and signs off annual policies, procedures and updated documentation in relation to safeguarding.
  - **Safeguarding Leads;**
    - Continuously improving risk management policy, strategies and supporting frameworks
  - **DSO;**
    - Ensure staff within the Club comply with the risk management policy and create a culture were risks can be identified and escalated.
  - **Employees, contractors & volunteers;**
    - Comply with risk management policies and procedures
4. When completing the risk management process the Football Club ensure the following steps are taken;
  - A. Establish the context
  - B. Identify the risk
  - C. Analyse the risk
  - D. Evaluate the risk
  - E. Treat the risk



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- F. Monitor and
5. The risk management is performance management, continuity management, and project management.
6. Risk categories may include, strategic, financial, environmental, safety, people and reputation
7. The risk register will be review annually by the CEO & SSM can be seen upon request.
8. The risk registers are prepared by the Safeguarding leads and reviewed by the CEO & SSM on an annual basis or when lessons learned.
9. Risk management performance indicators may include the number of internal audits, the number of internal audit findings accepted by management, the timeliness of remediating internal audit findings, and the reductions of the number of extreme risks in the risk register.



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**Appendix 18 – Mental Health Policy**

Date Written -14.05.2021

At Peterborough United we aim to promote and maintain the mental health and wellbeing of our staff.

We believe this is key to organisational success and sustainability.

**Our goals**

- Build and maintain a workplace environment and culture that supports mental health, overall health and wellbeing, and prevents discrimination (including bullying and harassment)
- Increase employee knowledge and awareness of mental health and wellbeing issues and behaviours
- Reduce stigma around depression and anxiety in the workplace
- Develop a programme of initiatives for identified at-risk areas
- Facilitate employees' participation in initiatives that support wellbeing and mental health
- Provide training and resources to deliver these initiatives
- Provide support for those affected by wellbeing issues
- Signpost people to sources of help when appropriate.
- To encourage the use of our professional Partnership in the event that a crisis occurs and the contact details are available to all.

**Employees' responsibility:**

- Understand this policy and seek clarification from management if needed.
- Support and contribute to providing a mentally healthy and supportive environment for all workers
- Take reasonable care of their own mental health and wellbeing, including physical health
- Take reasonable care that their actions do not affect the health and safety of other people in the workplace
- Share issues with their line manager in confidence if these may affect their wellbeing or ability to undertake duties, or which could put others at risk
- You can get support from Samaritans (call [free on 116 123](tel:116123) or email [jo@samaritans.org](mailto:jo@samaritans.org)).
- In an emergency, or if someone is vulnerable, please call 999.

**Managers have a responsibility to:**

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- Ensure that all who are United are made aware of this
- Signpost colleagues to
- Ensure their training and team training is up to date
- Actively support and contribute to the implementation of this policy, including its goals
- Manage the implementation and review of this policy.



working for/on behalf of Peterborough policy relevant support or resources

#### Resources

Cambridgeshire and Peterborough Adult Mental Health

[Cambridgeshire & Peterborough Adults Mental Health Support - October 2017 \(keep-your-head.com\)](#)

Headspace

[Meditation and Sleep Made Simple - Headspace](#)

Mental Health Awareness Week

[Mental Health Foundation](#)

MIND

[Guides to support and services | Mind, the mental health charity - help for mental health problems](#)

NHS Cambridgeshire Community Services

[Emotional Health and Wellbeing Service \(cambscommunityservices.nhs.uk\)](#)

Samaritans

[If you're having a difficult time | Samaritans](#)

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**Websites used within the document and reference list:**

<https://www.legislation.gov.uk/ukpga/1989/41/contents> Children's Act 1989

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>  
Keeping Children Safe

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>  
- working together to safeguarding children

<https://www.gov.uk/government/publications/no-secrets-guidance-on-protecting-vulnerable-adults-in-care> - no secrets act

<https://www.gov.uk/data-protection> - Data protection act

<http://www.legislation.gov.uk/ukpga/2015/6/contents/enacted> - Counter Terrorism and security Act 2015

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/591512/HO\\_DfE\\_consultation\\_response\\_on\\_CSE\\_definition\\_FINAL\\_13\\_Feb\\_2017\\_2\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/591512/HO_DfE_consultation_response_on_CSE_definition_FINAL_13_Feb_2017_2_.pdf) - Child Sexual Exploitation

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/398815/SEND\\_Code\\_of\\_Practice\\_January\\_2015.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/398815/SEND_Code_of_Practice_January_2015.pdf) - Special Educational Needs and Disability

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<https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis> - UK Council for Child Internet Safety

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779401/Working\\_Together\\_to\\_Safeguard\\_Children.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779401/Working_Together_to_Safeguard_Children.pdf) - Working Together to Safeguard Children

<http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted> - Modern Slavery Act 2015

<http://www.legislation.gov.uk/ukpga/2003/31/contents> - Female Genital Mutilation 2003

<https://www.gov.uk/government/publications/guide-to-the-general-data-protection-regulation> - General Data Protection Regulations 2018