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PETERBOROUGH UNITED FC

CLUB POLICY·

Safeguarding 2026-2027

POLICY OWNER

Name Rachel Green

APPROVED BY

Name Liz Elsom

Job Role

Head of Football Operations/Senior Safeguarding Manager

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Key safeguarding terminology and definitions

Child
This is defined in the Children's Act 1989 (amendment, 2004) as anyone under the age of 18.

Working Together to Safeguard Children 2023 (updated 23/02/2024), Safeguarding children is defined in Working together to safeguard children as: **protecting children from maltreatment.** preventing

impairment of children's health or development. ensuring that children are growing up in circumstances consistent with the provision of safe and effective care.

Adult
Is anyone aged 18 or over

Adult at risk
Is a person aged 18 or over who;

- Has needs for care and support (whether the local authority is meeting any of those needs)
- Is experiencing, or is at risk of, abuse or neglect
- As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of, abuse or neglect

Adult in need of care and support

This is determined by a range of factors including personal characteristics, factors associated with their situation or environment and social factors.
Naturally, a person's disability or frailty does not mean that they will inevitably experience harm or abuse.
In context of safeguarding adults, the likelihood of an adult in need of care and support experiencing harm or abuse should be determined by considering a range of one or more of the above descriptors.
In recent years there has been a marked shift away from using the term 'vulnerable' to describe adults potentially at risk from harm or abuse.

Parent

The Education Act 2011 defines a "parent" as: The natural (biological) parents of the child, whether they are married or not; Any person who although not a natural parent has parental responsibility for the child; Any person who although not a natural parent, has care of the child.

Abuse
Is a violation of an individual's human and civil rights by another person or persons.

Adult safeguarding
Is when we are protecting a person's right to live in safety, free from abuse and neglect.

Capacity
This refers to an individual's ability to decide at a particular time, for example when they are under considerable stress. The starting assumptions must always be that a person has the capacity to make decision unless it can be established that they lack capacity (Mental Health Capacity (amendment) Act 2019).

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.

Safety in Education; Keeping Children Safe in Education (KICSE) 2023. This document sets out statutory Safeguarding requirements for schools, Colleges and Academies.

The Club

This is when the policy is referring to Peterborough United Football Club (PUFC), its staff and all activities it undertakes. In certain circumstance, it may also refer to third parties with an entrusted responsibility for delivering Club supported activities.

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) Bespoke Build Training Ground, Oundle Road, Peterborough, Cambridgeshire, PE2 7EA

Staff

The word staff is referring to any persons employed and receiving payment for services from the Club. This is irrespective of the length or nature of their contract.

Senior Safeguarding Manager – **SSM**
Head of Club Safeguarding – **HSO**
Designated Safeguarding Officers – **DSO**

Volunteers

The word volunteer is referring to a person who freely offers their time to take part in a task, event or enterprise with the Club and their own expense, in terms of time and or resources.

Accommodation Provider: This means distant relative, unrelated, independent families or individuals contracted or employed (paid or volunteer) by the Football Club for the purpose of providing accommodation and care for Academy players/trialists who need to live away from home.

Positions of Trust

As a result of the roles and authority that any members of the Football Club's staffing team hold, they are in a position of trust in relation to those in their care. Thus, carrying authority, status, power, and responsibility.

If the staff involved are positive role models, displaying high moral and ethical standards the impact on adult at risks development can be significant. Thus, meaning that staff in a position of trust must not abuse their power for personal advantage or gratification or that of others. Any such abuse will be regarded as gross misconduct. All reports of abusing a position of trust must be reported through to any member of the safeguarding team or Match Day Key Staff.

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Safeguarding

Preventative and reactional measures taken by the Football Club to ensure the risk of harm or mistreatment to the welfare of vulnerable groups is minimised. The health or wellbeing of children is not impaired when engaging in Club activities and creating and maintaining an environment that allows children to be cared for safely, allowing for the best possible outcomes for them and provides them with the best life chances possible.

Welfare

The health, happiness, and fortunes of an individual and the welfare aspects of their life, including personal need and physical and mental development.

Rules, Regulations and Guidance

The Football Club is governed by the legislation and rules/regulations set out by several key governing agencies including the Government, Football Association (The FA) and the English Football League (EFL).

The Club recognises its responsibility to maintain regular communication with the Local Authorities of Peterborough and Cambridgeshire. The communication of the Club with the Local Authorities is centred upon supporting the Club with; reporting and monitoring safeguarding incidents, sharing of best practice, sharing of information, changes in legislation, sharing of important local area information and workforce best practice, training and development and any other relevant appropriate Safeguarding support.

Police

The Football Club is situated within the county of Cambridgeshire, therefore falling under the banner of Peterborough and Cambridgeshire Police Force. The force is responsible for the prevention and detection of crime and the maintenance of public order.

Match Day Key Staff

This is a team of staff who are employed by Peterborough United to organise and oversee the operations of a Match Day or event within the Weston Homes Stadium. These includes Football personnel such as

- The CEO
- The Safety Officer and their team
- The Football Club's Operations Manager
- Club Safeguarding Team
- Police Force
- Medical personnel

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Parent/ Parental Holder/Parental Responsibility

This is when a Parent/ Guardian 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

Introduction and Scope

The aims of this policy

This policy is in conjunction with Safeguarding children and adult at risks Club official policies and not in replace of them, it is to best enable the Club (including Women's and girl's teams) to be able to safeguard all children and adults at risk who interact within the Football Club. All Club policies and procedures can be found on the Club website - https://www.theposh.com/

These policies demonstrate best practice in safeguarding children and adults at risk, so we can provide protection for adults at risk who receive services from Peterborough United Football Club.
Providing staff and volunteers with guidance and clear instruction on procedures they should follow if they should suspect, and child or adult at risk may be experiencing or be at risk of harm.
Ensuring that staff, parents, and any other adult that encounters a child or adult at risk understand their safeguarding responsibilities and provide and promote role model behaviour.

The safety and welfare of children and adults at risk under the care of PUFC is paramount. All participants and visitors to the Club within all Club activities have a right to feel safe and be safe. All members of staff and volunteers have a duty to keep adults at risk safe and help protect them from abuse, exploitation, and poor practice, and have their welfare promoted. Staff have a 'duty of care' to keep children safe and help protect them from abuse or harm. All managers must ensure that their staff always understand and apply that duty.

All uncertainties, reports and or allegations of abuse will be taken seriously and immediately investigated thoroughly, which may involve the appropriate local authority teams, the English Football League and the County FA or The Football Association where necessary.

Peterborough United Football Club acknowledge' s its duty of care to safeguard and promote the welfare of children and adults at risk and is committed to ensuring safeguarding practice reflects statuary requirements and responsibilities, government guidance, recognised best practice and complies with The FA and English Football League ruling. All members of staff at the Football Club have a 'duty of care' towards the children and adults at risk that they encounter while in Club employment, to keep them safe. This can be done through respectful, caring and professional relationships between adults and children or adults at risk.

The Football Club expects all staff, players, volunteers, parents, contractors, and guests to share this commitment. The Club commits to employing a Senior Safeguarding Manager and Head of Club Safeguarding who implement, maintain, and monitors best practice throughout the whole Football Club.

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These safeguarding policies are applicable to the season of 2024/25 and will be monitored and reviewed a minimum of once a year, or whenever there is a change in legislation, organisational change or following any learning learnt outcomes or serious case reviews. Any review and changes in the policy will be conducted in consultation with the Local safeguarding adults board, The Board of the Club, Senior Safeguarding Manager and Head of Club Safeguarding. When talking about Club safeguarding this included all teams (9-16's under 18's under 21's, First team, women and girl's), visitors, fans (both home and away) and staff (stadium and training ground).

Contact Information and Roles and Responsibilities

The Club Safeguarding Team:-

- Liz Elsom – Senior Safeguarding Manager
  (e) liz.elsom@theposh.com (l) 01733 865947
- Rachel Green – Head of Club Safeguarding (Matchday safeguarding Officer/ Mental Health First Aider)
  (e) rachel.green@theposh.com –(m) 07840768108 – (dl) 01733 979131

Designated Safeguarding Team (Monday to Friday 09:00 to 17:00, agreed weekends);

- Ben Seymour-Shove – Designated Safeguarding Officer
  (e) ben.seymour-shove@theposh.com (l) 01733 865947

- Angus Meichan - Designated Safeguarding Officer
  (e) angus.meichan@theposh.com (l) 01733 865947

- Lewis Elsom – Designated Safeguarding Officer
  (e) lewis.elsom@thposh.com (l) 01733 865947

- Ryan Semple - Designated Safeguarding Officer
  (e) ryan.semple@theposh.com (m) 078430 838686 (l) 01733 865947

- Paolo Di Fabrizio Designated Safeguarding Officer
  (e) paolo.difabrizio@theposh.com (m) 074633 3226 (l) 01733 865947

- Christopher Abbott – Match Day Designated Safeguarding Officer/ Mental Health First Aider
  (e) fans@theposh.com (l) 01733 865947 (m) 077602 22487

- Dan Horton –Designated Safeguarding Officer
  (e) dan.horton@theposh.com (l) 01733 865947

- Phil Adlham – Women's Designated Safeguarding Officer
  (e) phil.adlham@theposh.com (l) 01733 865947

- Tony Cook –Designated Safeguarding Officer
  (e) tony.cook@theposh.com (l) 01733 865947

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- Ben Crawford –Designated Safeguarding Officer
  (e) ben.crawford@theposh.com (l) 01733 865947

- Martyn Kelsey–Designated Safeguarding Officer
  (e) martyn.kelsey@theposh.com (l) 01733 865947

- Luisa D'Angelo –Designated Safeguarding Officer
  (e) ldangelo@theposh.com (l) 01733 865947

- Chloe Brown – Women and girls Designated Safeguarding Officer
  (e) chloe.brown@theposh.com (l) 01733 865947

Senior Safeguarding Manager (SSM) and Head of Club Safeguarding (HCO)

The Senior Safeguarding Manager and Head of Club Safeguarding for the Club have the overall responsibility to oversee and direct the safe provisions of all activities and associated training relating to adults at risk. A strategic role providing leadership and guidance on all safeguarding matters and relevant legislation, along with implementing safeguarding awareness and best practice across the Club.

The Senior Safeguarding Manager and Head of club Safeguarding Officer attend regular safeguarding training and maintain an up-to-date knowledge base of relevant legislation, regulations, and best practice.

Designated Safeguarding Officers (DSO)

The Designated Safeguarding Officers support the Head of Club Safeguarding to pro-actively promote and raise safeguarding awareness, they assist with responding to safeguarding concerns and allegations and are therefore strategically based throughout all Club and Academy activities when required.
The HOS will ensure that suitable policies and procedures are in place. Ensuring that all DSOs are appropriately and adequately trained to prevent or aid with the dealing of all safeguarding issues.

The DSO's will work with the HOS and SSM to support the implementation of the Club's safeguarding policies and procedures. DSO's will contribute to the maintaining and improving of safeguarding policies and procedures. They will advise others working with children and adults at risk on the implementation of the Club's policies and procedures to safeguard and promote the welfare of vulnerable groups.
DSO's will support the SSM and HOS in ensuring that all staff within any capacity understand their individual responsibilities to safeguard and promote the welfare of children and adults at risk.

Match Day Key Staff

The Match Day key staff support the Match Day Safeguarding officer, the Head of Safeguarding (if In attendance) and Safety Officer (SSO) to pro-actively oversee the operational side of a match day and to promote and raise safeguarding awareness. The Head of Safeguarding completes a First team Safeguarding briefing for all home

games regardless of the status. They assist where applicable with responding to safeguarding concerns and allegations.

- The HOS will ensure that suitable policies and procedures are in place.
- The HOS and SSO will support Human Resources with all relevant training is required to prevent or aid with the dealing of all safeguarding issues.
- The Match Day Key staff will work with the HOS and SSM to support the implementation of the Club's safeguarding policies and procedures.

Safeguarding Strategy

Peterborough United has a major role in terms of safeguarding the players and adults at risk and promoting their welfare
This means the Club and all its staff need to;

- Have awareness of safeguarding issues, as the implementation of good practice and effective procedures, are key to safeguarding across the whole Club

This strategy is intended to set out how the Club can continue to improve its performance in safeguarding children and adults at risk, and through the Clubs actions, encourage and enable other agencies to make their own required contribution.

Continuous development of this document will be an ongoing discussion, with those with experience past and present of the safeguarding provision of the Club. As the safeguarding strategy is developed there will be discussions with outside organisations such LADO and the English Football League (EFL) with a view to progressing and multi-agency safeguarding strategy.

Accompanying this document is a safeguarding training matrix which sets out the requirements within the Club, to indicate when CPD and training needs to be undertaken or renewed.

About this strategy

This document outlines Peterborough United's strategic approach to strengthening the arrangements for safeguarding and promoting the welfare of all children and adults at risk that are involved in any official Club activities.

The document explains the processes through which conversation mapping and awareness rising will continue as well as the development of for reviewing progress and the timescales in which this appraisal will occur.

The strategy relates to and will involve all departments throughout the Football Club.

What are the aims of the safeguarding strategy?
The overarching aims of the safeguarding strategy are:

- To ensure, first and foremost, that the Club's children and adults at risk are safe.

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- To encourage, embed and maintain the best safeguarding practice across all areas of the Club and to ensure continuous improvement and compliance with Football Association (FA), Government and EFL policies.
- To raise awareness about safeguarding across the Club.
- To ensure that the Designated Safeguarding Officers (DSO) and Safeguarding Leads work in partnership with, and contribute to, the safeguarding work of

What are the priorities?

At this stage the proprieties for Peterborough United are;

- To ensure services fulfil FA, EFL and government policies and requirements for safeguarding.
- To maintain and develop record keeping, case management and support to children, adults at risk and their families.
- To improve and develop preventative services.
- To enhance leadership and provide effective governance.
- To develop the workforce with focus on safer recruitment, supervision and staff development that establishes and secures change management, so that staff are equipped to undertake their crucial safeguarding role.
- To develop and enhance performance management arrangements.
- To ensure that there is good communication and consultation about safeguarding, and that services are appropriately accessible.

Governance;

- This document is developed for and on behalf of Peterborough United Football Club. As part of the developing process of awareness, raising and action planning, there will be conversations and input from every department. This strategy will be treated as a working document.
- The safeguarding leads and DSO will be responsible for promoting conversations of safeguarding issues at safeguarding meetings, Club meetings, Academy Management meeting, technical control meetings and the main board meetings. They will be reporting on progress made and challenges faced in implementing the strategy, policies and procedures and developing the priorities.
- All board members are expected to ensure that there are conversations about safeguarding priorities within their board meetings and that this is implemented down through the Club.
- The Safeguarding leads will, supported by the CEO & SSM, take responsibility for promoting careful conversations of safer recruitment and safeguarding training for all staff were appropriate.
- The CEO & SSM must ensure that Club complies with inter-agencies reporting requirements and contributing to development of joint inter-agency safeguarding strategy.

Equality impact assessment

This strategy is intended to safeguard and promote the welfare of all the Club's children, adults at risk and staff. It will be important when all DSOs are taking necessary action to deliver the safeguarding strategy, giving particular

care to promoting diversity. In the context of safeguarding, this means that all DSOs take particular care to ensure that the safety and welfare of venerable, marginalised and potentially excluded children is promoted. Meeting the needs and welfare of disabled children and adults, children and adults from minority ethnic groups and all faith groups, those from travelling families and those whose parents are vulnerable is central to successful implementation of this strategy.

Risk Management

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.

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.

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

When completing the risk management process the Football Club ensure the following steps are taken;

- Establish the context
- Identify the risk
- Analyse the risk
- Evaluate the risk
- Treat the risk
- Monitor and review the risk

- The risk management is factored into business planning, performance management, audit and assurance, business continuity management, and project management.

- Risk categories may include, strategic, financial, environmental, safety, people and reputation
- The risk register will be review annually by the CEO & SSM can be seen upon request.
- The risk registers are prepared by the Safeguarding leads and reviewed by the CEO & SSM on an annual basis or when lessons learned.
- 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

Abuse

Abuse can happen on any occasion at any place where children or adults at risk are in attendance.
Abuse is any form of physical, emotional, or sexual mistreatment or lack of care leads to injury or harm of the child, or adult at risk.

Any allegations or suspicions of abuse or poor practice 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

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.

Examples	Signs Include
• Withholding help or support necessary to carry out daily living tasks • Ignoring medical and physical care needs • Failing to provide access to health, social or educational support • The withholding of medication, nutrition and heating • Keeping someone in isolation • Failure to intervene in situations that are dangerous o 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.	• Constant hunger, sometimes stealing food from others • Dirty or 'smelly' • Loss of weight, or being constantly • Underweight • Inappropriate dress for the weather • Complaining of being tired all the time • Having few friends • Worsening of health conditions • Mentioning their being left alone or unsupervised • Sore or extreme nappy rash • Skin infections • Lack of response to stimuli or contact • Poor skin condition(s) • Anxiety • Distressed • Child moves away from parent under stress • Little or no distress when separated from primary carer • Inappropriate emotional responses • Language delay

Physical Abuse

Is 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
• Shaking • Pinching • Slapping • Force-feeding • Biting • Burning or Scalding • Causing needless physical • Discomfort Inappropriate restraint • Locking someone in a room	• Unexplained bruising, marks or injuries on any part of the body • Frequent visits to the GP or A&E • An injury inconsistent with the explanation offered • Fear of parents or carers being approached for an explanation • Aggressive behaviour or severe temper outbursts • Flinching when approached • Reluctance to get changed or wearing long sleeves in hot weather • Depression • Withdrawn behaviour or other behavioural change • Running away from home/residential care • Distrust if adults, particularly those with whom a close relationship would normally be expected.

Sexual Abuse

This is where children or adults at risk are abused by an adult or child 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
• Rape and other sexual offences • 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. • Being encouraged or enticed to touch the abuser • Coercing the victim into watching or participating in pornographic videos, photographs, or internet images • Any sexual relationship that develops where one is in a position of trust, power or authority	• Pain or itching in the genital/anal areas • Bruising or bleeding near genital/anal areas • Sexually transmitted disease • Vaginal discharge or infection • Stomach pains • Discomfort when walking or sitting down • Pregnancy • Sudden or unexplained changes in behaviour, e.g. becoming aggressive or withdrawn • Fear of being left with a specific person or group of people • Nightmares • Leaving home • Sexual knowledge which is beyond their age or development age • Sexual drawings or language • Bedwetting • Saying they have secrets they cannot tell anyone about • Self- harm or mutilation, sometimes leading to suicide attempts • Eating problems such as overeating or anorexia

<u>Emotional Abuse</u>

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.

Examples	Signs include
• Intimidation and/or threats • Bullying • Rejection • Shouting • Indifference and the withdrawal of approval • Denial of choice • Deprivation of dignity or privacy • The denial of human and civil rights • Harassment • Being made to fear for one's well being	• A failure to thrive or grow • Sudden speech disorders • Developmental delay, either in terms of physical or emotional progress • Behaviour change • Being unable to play or socialise with others • Fear of making mistakes • Self- harm • Fear of parent or carer being approached regarding their behaviour • Confusion

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.

Accommodation

At Peterborough United Football Club, we offer Club provided accommodation to the Professional Development Phase and any incoming trialists over the age of 16 where applicable. Peterborough United Football Club do not place any player or trialist in accommodation under the age of 16 years old. If an under 18 is residing with an over 18, they will have separate rooms and the over 18 player have a DBS undertaken.
Peterborough United work with a cohort of providers who have worked with the Football Club or several years however, there are occasions when providers need to be recruited. When this occasion occurs, the following steps are made to recruit accommodation providers;

- Official Peterborough United adverts are uploaded onto the Club website and shared on Club official social media accounts.
- Any person applying for the role as an accommodation provider must complete a Host Family Application form.
- Upon receipt of an application form the Head of Club safeguarding, or Player Care Manager contacts the applicant via means of telephone calls, this is known as phase 1;

    - Phase 1 - an informal meet and greet. Within this informal meet and greet the Head of Club Safeguarding or Player Care Manager will gain the following information;

- Where is the property
- Who lives in the property? What ages are those that live at the property?
- Do pets reside at the property? If so of what species and how many?
- Do the applicants work and if so where and as what?

- Upon successful completion of phase 1, the Head of Club Safeguarding or Player Care Manager will contact applicant via email, this is known as;

Phase 2 – information sharing and interviewing proposal and house viewing and references will be requested.

- Once a date has been agreed for interview and house viewing the Head of Club Safeguarding and player car manager will visit the applicant and their home, this is known as;
    - Phase 3 – Interview and house viewing, the house viewing will include;
        - Fire Risk Assessment
        - Home Risk Assessment
- During the interview and house viewing the Club will go through documentation, DBS process, continual professional development offered both mandatory and compulsory, Safeguarding policies and protocols, accommodation expectations and processes throughout the season. Documentation includes
    - PUFC and Accommodation agreement
    - Policies and procedures
    - Handbooks
- After the interview and house viewing, the applicant will be discussed with the Academy Manager and if all in agreement the applicant will be emailed for the following documentation to be sent over;
    - Gas certificate
    - House insurance
    - Peterborough United will arrange for an external contractor to attend the property to conduct PAT testing on all equipment and sockets used by the players.
- Following receival of documentation the Club and the provider will agree a start date.

<u>Player allocation process</u>

At Peterborough United we aim to place players where they will most comfortable, the following steps are taking at the start of each season when housing players;

- Player care manager will send out a questionnaire regarding accommodation and like and dislikes

- First year scholars that are entitled to Club provided accommodation will receive a letter from the Head of Club Safeguarding offering the opportunity, this is known as phase 1;
    - Phase 1 – Letter of offer, this includes;
        - Fee for accommodation
        - Length of accommodation
        - Contractual agreement stipulation
        - Home visit
        - Teams meeting with Host, player, parents and club representative.

- Once the Head of Club Safeguarding and player care manager have conducted the teams meetings final decision will be made as to where best to place a player, this is known as phase 2.

- Once your Club provided accommodation has been decided the player will receive a location letter, this is known as phase 3 ;
    - Phase 3 – offer letter. This letter will include the address and contact details of the Club provided accommodation, the players moving in date, the time of moving in – each player will
    - be met at their accommodation by the Head of Club safeguarding and the player care manager for a player, parent, and provider introduction.

Peterborough United where possible will house a first-year scholar and a second-year scholar together to ease the transition period from living at home to living away from home.

End and Start of Season

At the end of each season players within the Peterborough United Academy will move from;

- First Year Scholar to a Second Year Scholar
- Second Year Scholar to Under 21 players
- Under 21 players to Under 21 players in their second year
- In the approach to the end of the season each provider will be issued with a letter from the Head of Club Safeguarding or Player care manger, this is known as phase 1;
    - Phase 1 – End of Season Letter, this letter will thank providers for their continued support throughout the season to both the players in their care and the Club. The Club will inform providers of the last working day of the players in their home and ask them if they would like to continue next season, with which age group they would like to house and how many players they would like to take.
- Once providers have notified the Head of Club Safeguarding or Player Care Manager as to whether they would like to continue housing players in the upcoming season, the Head of Club Safeguarding or Player Care Manager will then arrange a home visit viewing in which the Head of Club Safeguarding and Player Care Manager will attend, this is known as phase 2;
    - Phase 2 – Home visit viewing. This is to go through the past season and any lessoned learnt and the upcoming season, the following information will be shared with the provider;
        - New agreement between provider and Peterborough United
        - Nutrition guide
        - Handbook for the upcoming season
        - Any new EFL documentation and guidance
- Once a date has been confirmed by the Professional Development Lead Phase and Academy Manager as to when the players will be returning for Pre-Season, it will be notified out to accommodation providers along with a proposed start date for players to arrive in accommodation.
- Once a date has been agreed, providers will be issued with an upcoming season letter, this is known as phase 3;
    - Phase 3 – Upcoming season letter, providers will be issued with the name/s of the players due to be staying with the for the upcoming season. This letter will also inform them of the player start

date and time in which the Head of Club Safeguarding and player care manager will be attending to conduct an introduction.

Player Code of Conduct

Peterborough United Head of Club Safeguarding or Player Care can be contacted at any point throughout the player/s stay in your home.
Should there be an issue that is concerning a player or an incident that you feel needs to be brought to attention please do not hesitate to do so.

In the event of the player not being at your accommodation at the allocated time and you are unable to make contact, then please notify the Football Club immediately. (these timings are stipulated within the players code of conduct.

Following this, if The Football Club will follow the below procedure:

- Head of Club Safeguarding will call the player Care Manager if there is no answer:
- Head of Club Safeguarding or Player care Manager will attend the players accommodation (Academy Manager and Professional Development Lead will be informed)
- Once the Head of Club Safeguarding has arrived at the players accommodation the Head of Club Safeguarding will try and make contact again with the player. After this call, if there is still no answer:
- Head of Club Safeguarding will notify the players) legal guardian and the local police.

The players are not permitted to spend the night at any other premises without the permission of the Academy Manager, Youth Team Manager Player Care Manager, or the Head of Club Safeguarding.

The house phone within accommodation is out of bounds unless for emergencies

Accommodation providers are asked to notify the Club if the player is eating or storing inappropriate foods (a nutrition guide will be issued to both the player and Host families.

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

While in Accommodation the player must follow the below rules.

- No anti-social behaviour is permitted at any time
- No alcohol, tobacco products (including snus) or drugs are to be consumed at any time
- There is to always be safe and sensible use of the internet, TV's, videos, mobile phones and all electronic devices, at all times.
- There are risks associated with inappropriate use of social media. Be aware and be warned.
- The player must not to allow anyone else onto the premises without permission of the provider, including other players from Peterborough United FC.
- Players are not permitted to spend the night at any other premises without the permission of the Academy Manager, Professional Development Lead, Player Care Manager and or Head of Club Safeguarding.
- Players are to always keep their bedrooms clean and tidy; this includes
    - Making you bed
    - Hanging up your cloths

    - Emptying your bins
- Always be mindful of security at your accommodation;
    - Close windows and doors at appropriate times
    - Lock the main door when leaving for work if you are the last person in the house
    - If the player are issued with a key/keys and the player misplaces or loses this key, the play are responsible for paying for a replacement.
- The players are responsible for doing your own laundry and bedding.
- The players are expected to clean your bedroom and your bathroom, you (the player) are also expected to clean and tidy any areas of the house you use.
    - If provisions are running low (e.g.) milk, please let your providers know in a polite and courteous manner
    - The house phone is out of bounds unless for an emergency
    - Players in accommodation have a curfew of 21:30 for under 18's and under 21's are 22.00 Sunday to Friday and a Saturday an additional half an hour for both, this means you (the player) must be in your accommodation by this time, but are advised to be in earlier.
    - If players are requested to attend a first team evening game at the Weston Homes Stadium the curfew will be extended to 22:30. This means you (the player) must be in your accommodation by this time
    - Should a player not be in their accommodation at the times stipulated the procedure discussed on page six. At some point throughout your contract with Peterborough United FC you may be requested to join the first team squad on overnight travels or travel that requires a late arrival back to your accommodation. You (the player) are expected to communicate efficiently and effectively with your provider with, travel times, mealtimes and arrival back to accommodation times. (The Player Care Manager will also notify your legal guardian and provider)
    - All players (no matter the age of the player) in accommodation will have regular spot checks throughout the season on their bedrooms.
    - Providers are to notify the Club of any problems or concerns, where necessary we will then speak directly with you (the player)
    - All players are to communicate any problems with the Player Care Manager, Academy Manager, Professional Development Lead and or Head of Club Safeguarding.
    - You (the player) are expected to be in your Club provided accommodation from Monday (after training) through to Saturday morning, this is the agreement we have with your provider unless we agree another arrangement directly with you (the player). Players not in accommodation on these days will be spoken to directly. It is the Clubs responsibility to ensure the safety and welfare of you while in accommodation and therefore we must know where you are.
    - If you need to travel home for an appointment or family matter this must be agreed with Player Care Manager, Academy Manager, Professional Development Lead and or Head of Club Safeguarding prior to you doing so.
    - The above two points also affect your FA Whereabouts, if we do not know your whereabouts, we could log you down with the FA as at a false location, this could result in a player fine.

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Online Guidance

The below has been put together to offer guidance around online issues but is not exhaustive and there are other dangers online that young people can be exposed to. If you have any concerns whatsoever, please do not delay bring these concerns to the attention the Head of Club Safeguarding.

Adjust Controls

Adjust the parental controls on your broadband and internet enabled devices, depending on your young person's (player) age. Your broadband provider can tell you how. Find out how to set up safe search in Google by going to the Google Safety Centre. Remember that at this age, given that these players are in fact young men, that it is important that this needs to be done alongside dialogue and discussion.

Privacy Matters

Make sure they set high privacy settings on social networks. Encourage them to regularly change their passwords and never to share or put online any of their personal details, such as their phone number, address or their Academy details

Keep Talking

Be interested in what they're (player) doing online and discuss what they (player) might have come across. Do not be afraid to tackle difficult subjects like cyberbullying and sexting and pornography. Help them to be critical of things they see online and judge the quality and reliability of online sources. Acknowledge that this is difficult considering how content can be manipulated online to persuade even the savviest people. Talk together about how to manage some of these challenges.

Tips for a meaningful conversation

- Make sure your young person (player) knows they can come to you if they're concerned by something they've seen online and make sure that you listen and don't overreact - the important thing is that they have come to you for help and support.
- Tell them you trust them to do the right thing rather than over monitoring their internet use.
- If your young person (player) comes to you with an issue, stay calm and listen without judging them. • Tackle peer pressure by explaining that if they are talked into bullying someone online or sending inappropriate images it may get reported to their Academy or even the police.
- Talk to them about how much time they spend online and make sure this is balanced against other activities.
- Discuss how they can report any harmful or inappropriate content or behaviour that they encounter online - empower them to take control themselves.

Online Reputation

Remind your young person (player) that anything they upload; email or message could stay online forever. Reinforce to them that they should only post things online that they would not mind their parents, you, their coaches, or a

future employer seeing. There are lots of stories in the media that highlight the importance of online reputation and clearly demonstrate how things that happened years ago, can resurface in the future.

Abuse of footballers, and in particular racist abuse, has provided an unwelcome theme throughout this season. Barely a week - often a day - goes by now without a story about a footballer being racially abused on social media. Incidents of racist abuse in English football are rising. If your young person (player) discloses that they have been a victim of racist abuse, then please report this to Head of Club Safeguarding.

Sexting

Sexting is when people share a sexual message and/or a naked or semi-naked image, video, or text message with another person. It is also known as nude image sharing. Young people (player) may consent to sending a nude image of themselves however, they can also be forced or coerced into sharing images by their peers or adults online.
If a young person (player) originally shares the image consensually, they have no control over how other people might use it.

If the image is shared around peer groups, it may lead to bullying and isolation. Perpetrators of abuse may circulate a nude image more widely and use this to blackmail a young person and/or groom them for further sexual abuse.

It's a criminal offence to create or share explicit images of a child, even if the person doing it is under 18 years of age. If sexting is reported to the police, they will make a record but may decide not to take any formal action against a young person (player). Should be become aware that the young person in your care has been involved in 'sexting', please speak to your Club Designated Safeguarding Officer for advice.

Online grooming – Extremism and Radicalisation

Young people (player) can be exposed to different views and receive information from various sources. Some of these views may be considered radical or extreme.
Radicalisation is the process through which a person comes to support or be involved in extremist ideologies. It can result in a person becoming drawn into terrorism and is in itself a form of harm. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It includes calls for the death of members of the British armed forces (HM Government, 2013).

Challenging and tackling extremism needs to be a shared effort (HM Government, 2013). For this reason, the Government has given some types of organisations in England, Scotland, and Wales a duty to identify vulnerable children and young people and prevent them from being drawn into terrorism. However, all organisations that work with children and young people have a responsibility to protect children from harm, including Football Clubs. This includes becoming radicalised and/or being exposed to extreme views.

How does radicalisation happen?

The process of radicalisation may involve: · being groomed online or in person· exploitation, including sexual exploitation.

- psychological manipulation
- exposure to violent material and other inappropriate information ·
- the risk of physical harm or death through extremist acts.
-

It happens gradually so children and young people who are affected may not realise what it is that they are being drawn into.

Vulnerability factors

Anyone can be radicalised but there are some factors which may make a young person more vulnerable. These include: ·

- being easily influenced or impressionable
- having low self-esteem or being isolated
- feeling that rejection, discrimination or injustice is taking place in society
- experiencing community tension amongst different groups
- being disrespectful or angry towards family and peers
- having a strong need for acceptance or belonging
- experiencing grief such as loss of a loved one.

These factors will not always lead to radicalisation.

Indicators of radicalisation

If a young person is being radicalised their day-to-day behaviour may become increasingly centred around an extremist ideology, group or cause. For example, they may:

- spend increasing amounts of time talking to people with extreme views (this includes online and offline communication)
- change their style of dress or personal appearance · lose interest in friends and activities that are not associated with the extremist ideology, group or cause
- have material or symbols associated with an extreme cause
- try to recruit others to join the cause

(Home Office, 2023).

What to do if you think a young person is being radicalised If you think a child or the people around them are involved in radicalisation and there is an immediate risk of harm, call 999 straight away.

If it is not an emergency, follow your organisation's procedures. This might include:

- contacting your Designated Safeguarding Officer at the Club
- calling the police antiterrorism hotline on 0800 789 321 ·

You can report concerns about extremism in schools and organisations that work with children, or where you think a child is at risk of extremism via 020 7340 7264 or counter.extremism@education.gov.uk

Positive messages

You can build young people's resilience to radicalisation and extremism by:

- helping improve their self-esteem and self-confidence
- promoting inclusivity and community cohesion

- providing a safe environment for debating a range of issues such as British values, recognising and managing risk, making safer choices and the impact of pressure from others
- helping young people (player) understand how they can influence and participate in decision making.

Grooming

Grooming is "a process by which a person prepares a child, significant adults and the environment for the abuse of the child or young person" (Craven, 2006). Grooming can happen anywhere, including:

- online
- in organisations
- in public spaces (also known as street grooming)

Young people (player) can be groomed by a stranger or by someone they know – such as a family member, friend or professional. The age gap between a child and their groomer can be relatively small (NSPCC and O2, 2016). Grooming techniques can be used to prepare children for sexual abuse and exploitation, radicalisation

Signs a child or young person is being groomed include:

- sudden changes in behaviour · going missing from home or work
- secretive use of technology
- having unexplained gifts
- alcohol and/or drug misuse
- having a much older 'boyfriend' or 'girlfriend'
- developing sexual health problems
- mental health problems

Groomers gain trust by:

- pretending to be someone they're not, for example saying they are the same age as the young person online
- offering advice or understanding
- buying gifts
- giving the young person (player) attention
- using their professional position or reputation
- taking the young person (player) on trips, outings or holidays

Gaining power

Once they have established trust groomers will exploit the relationship by isolating the young person from friends or family. Groomers will use power and control to make a young person (player) believe they have no choice but to do what the groomer wants.

Secrets

Groomers may introduce 'secrets' to control or frighten the young person. Sometimes they will blackmail them or make them feel ashamed or guilty to stop them telling anyone about the abuse.

Manipulation

Groomers use a range of strategies to entrap a young person and manipulate them into participating in both online and offline sexual activity. They present themselves as approachable, likeable and having shared interests with the young person that they are targeting.
Groomers will test a young person's compliance by persuading them to carry out inappropriate or abusive activities.

Online grooming

Groomers can use social media, instant messaging apps (including teen dating apps) or online gaming platforms to connect with a young person. They can spend time learning about a young person's interests from their online profiles and then use this knowledge to help them build up a relationship.
It's easy for groomers to hide their identity online – they may pretend to be another young person of similar age and then chat and become 'friends' with person they are targeting.

Groomers may look for:

- usernames or comments that are flirtatious or have a sexual meaning ·
- public comments that suggest a young person has low self-esteem or is vulnerable.
- Groomers don't always target a particular young person: sometimes they'll send messages to hundreds of young people and wait to see who responds. Groomers don't need to meet children in real life to abuse them. Increasingly groomers are sexually exploiting young people by persuading them to take part in online sexual activity.

Groomers gain trust by:

- pretending to be someone they are not, for example saying they are the same age as the young person online
- offering advice or understanding
- buying gifts
- giving the young person attention
- using their professional position or reputation

How to prevent grooming

To prevent grooming, it is important for there to be community awareness about what grooming is, how it works and how it can lead to abuse. Communities can be the strongest allies in protecting young people from exploitation. It's also essential for those who work with young people to empower them to recognise and speak out about abuse.

This includes:

- teaching young people about healthy relationships
- helping young people develop the awareness and skills needed to keep safe online.

Child Sexual Exploitation (CSE) CSE is a type of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity. Children and young people in sexually exploitative situations and relationships are persuaded or forced to perform sexual activities or have sexual activities performed on them in return for gifts, drugs, money or affection. CSE can take place in person, online, or using a combination of both. Perpetrators of CSE use a power imbalance to exploit children and young people. This may arise from a range of factors including:

- age
- gender
- sexual identity
- cognitive ability
- physical strength
- status
- access to economic or other resources (KCSIE 2024).

Sexual exploitation is a hidden crime. Young people (players) have often been groomed into trusting their abuser and may not understand that they are being abused. They may depend on their abuser and be too scared to tell anyone what is happening because they don't want to get them in trouble or risk losing them. They may be tricked into believing they are in a loving, consensual relationship.

Child sexual exploitation online

When sexual exploitation happens online, young people may be persuaded or forced to:

- have sexual conversations by text or online
- send or post sexually explicit images of themselves
- take part in sexual activities via a webcam or smartphone

Abusers may threaten to send images, video or copies of conversations to the young person's friends and family unless they take part in further sexual activity. Images or videos may continue to be shared long after the sexual abuse has stopped.

Impact of child sexual exploitation

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Child sexual exploitation (CSE) can have long-term effects on young people's wellbeing, impacting on their life into adulthood.

Some difficulties faced by young people who have been sexually exploited include:

- isolation from family and friends
- falling behind on schoolwork, failing exams or dropping out of school altogether
- teenage parenthood
- unemployment
- mental health problems
- alcohol and drug addiction
- having a criminal record
- suicidal thoughts and attempts
- Impact of online child sexual exploitation

Research suggests that online child sexual abuse can have as much of an impact on a child as abuse that only takes place offline and can lead to the same psychological difficulties (Hamilton-Giachritsis et al, 2017). Effects can include:

- self-blame
- flashbacks or intrusive thoughts
- difficulties sleeping
- nightmares
- extreme tiredness
- difficulties concentrating
- difficulties keeping up with schoolwork
- behavioural problems at school
- depression
- low self-esteem
- social withdrawal
- panic attacks and anxiety
- eating disorder or eating difficulties
- self-harm

Recognising child sexual exploitationChild sexual exploitation (CSE) can be very difficult to identify. Warning signs can easily be mistaken for 'normal' teenage behaviour.

Child sexual exploitation (CSE) can be very difficult to identify. Warning signs can easily be mistaken for 'normal' teenage behaviour.

Behavioural indicators

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Young people (players) who are being sexually exploited may display certain behaviours: · displaying inappropriate sexualised behaviour for their age

- being fearful of certain people and/or situations
- displaying significant changes in emotional wellbeing
- being isolated from peers/usual social networks
- being increasingly secretive
- having money or new things (such as clothes or a mobile phone) that they can't explain
- spending time with older individuals or groups
- being involved with gangs and/or gang fights
- having older boyfriends or girlfriends
- missing school and/or falling behind with schoolwork
- persistently returning home late
- returning home under the influence of drugs/alcohol
- going missing from home or care
- being involved in petty crime such as shoplifting
- spending a lot of time at hotels or places of concern, such as known brothels · not knowing where they are, because they have been trafficked around the country

Physical signs include: · unexplained physical injuries and other signs of physical abuse

- changed physical appearance - for example, weight loss
- scars from self-harm

Perpetrators of child sexual exploitation

CSE can be perpetrated by:

- individuals or groups
- males or females
- young people or adults.

The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

Identifying perpetrators is difficult because:

- data is not always recorded or is inconsistent or incomplete
- young people may only know their abuser by an alias, nickname, or appearance
- victims may be 'passed between' abusers and assaulted by multiple perpetrators
- young people are often moved from location to location and abused in each place
- young people may be given alcohol or drugs, so may not remember details clearly

People who sexually exploit children are often described as highly manipulative individuals. They exert power over young people through physical violence, emotional blackmail, or financial pressure, for example holding them in debt.

Perpetrators may use one victim to gain access to others, persuading or forcing a child or young person to bring their friends along to pre-arranged meetings or 'parties'. In some cases, if a young person tries to break free, the perpetrator will use their peers to draw them back in.

If you think a young person is in immediate danger, contact the police on 999. If you are worried about a young person but they are not in immediate danger, you should share your concerns.

- With the Club Designated Safeguarding Officer (DSO) · Contact the NSPCC Helpline on 0808 800 5000
- Contact your local child protection services, however, it is advisable to first have a conversation with the Club DSO
- Contact the police

Young People and Gambling

Although most gambling is illegal for under 18s, the latest full Young People and Gambling Survey shows that approximately 350,000 (11%) of 11-16-year-olds spent their
own money gambling in the previous week – that's more than those who smoked (6%) or took drugs (5%). More boys than girls gamble, and as many as 55,000 young people nationally can be classified as 'problem' gamblers using a recognised screening tool.

When asked, over half said they gamble for fun, while a third do it with the intention of winning money, and another third because 'it gives me something to do'. Others gamble to 'get a buzz' or because they like to take risks. One in 10 points to their parents' or guardians' gambling behaviour as a reason why they do it, while some young people say they gamble to boost their mood when they feel anxious or down.

Helping your young person (player) to understand the risks and consequences of gambling, in an open and non-judgemental way, is often more beneficial than a prescriptive 'don't do it' approach. It's also important to understand how your own attitudes to gambling can affect young people, and to realise the negative impact of problem gambling.

By visiting bigdeal.org.uk, you can find out more information from factsheets, practical tips, and further resources. There is also a number for advice and support, 0203 092 6964. Additionally, the National Gambling Helpline is a 24-hour service and can be found on 0808 8020 133.

Risk Factors

Risk factors for problem gambling include a history of gambling in the family; an early big win; low self-esteem, boredom or depression; and peer pressure. If you are worried that your young person is gambling and that it could be getting out of control, these are some signs to look out for:

- Becoming moody or restless, acting secretive, lying
- Missing work, loss of interest in extracurricular activities and hobbies
- Increased interest in money and possessions; having more (or less) cash than usual

- More competitive than they used to be, keen to 'be right' about things
- Social Gaming, eSports, and Skins Betting

The key difference between social gaming and gambling is that with social gaming you cannot win a prize that is classified as money or 'money's worth'. If you can win points or 'virtual currency' (with no real-world value) on a game involving social interaction, that is classified as social gaming

Skins are mostly cosmetic items players can purchase in a variety of games for players to customise their characters. Players can buy, sell and exchange these items. When these items are used as virtual currency to bet on the outcome of professional matches or other games of chance, that is defined as skins betting.

Some players may spend a lot of time on a social game. This is especially common on games that have an immersive world, or customisable characters. The physical implications (inactivity, repetitive strain injury, sleep deprivation) go hand in hand with social implications, such as social isolation, or lack of self-care. In-app or in-game purchasing can be a very easy way to run up a significant bill. With one tap, players can buy bonuses, level ups, hints etc., and quickly lose control of spending limits. eSports is a form of competition that takes place electronically, most often in the form of video games. Some eSports professionals make money from gaming competitively online and in packed out arenas. eSports is a popular spectator sport, with an estimated global audience of up to 150 million people. As such it has become an attractive betting proposition. Popular eSports Games include Défense of the Ancients (DOTA), League of Legends (LOL), Counter Strike Global Offensive (CS: GO) and Overwatch.

eSports and betting have become more closely linked in recent times; however, eSports is popular with a young demographic and many fans are under the legal age to gamble. Though proportionally there is little gambling on e-sports taking place in the mainstream market, there are more opportunities to place bets in unregulated markets. This is a of particular concern in relation to young people. eSports matches are also streamed for free on the web, via sites like twitch.tv, which can also include promotion for different forms of gambling. The Gambling Commission has started to consider this as an issue of concern, along with skins betting.

If you have any concerns in respect of gambling or online gaming in respect of your young person, please discuss this with your Club DSO and reach out to the help available at bigdeal.org.uk

Learn more about apps

It can be difficult to stay on top of what apps your young person is using and who they are talking to online – find out more about the latest apps at internetmatters.org/apps

Further advice and support

If you are worried about your young person and think something is not quite right, it's best to be on the safe side and contact the Club DSO for further discussion. You can get more information and advice on the Thinkuknow website for parents and carers which provides support and guidance for parents from leading experts and organisations.

You can also find out where to get help and advice on the 'Report an issue' page of internetmatters.org where information is included on how to report online problems - and which relevant organisations and agencies to turn to. Information is also provided on how to deal with any specific issues you may encounter with your young person, such as cyberbullying, finding inappropriate content, privacy and identity theft, online reputation, online pornography, and grooming.

If you are worried about online sexual abuse or the way someone has been communicating with your young person online, you can always make a report to one of CEOP's (Child Exploitation and Online Protection) Child Protection Advisors, at www.ceop.police.uk

Behavioural indicators

Young people (players) who are being sexually exploited may display certain behaviours: displaying inappropriate sexualised behaviour for their age.

Care and Accommodation Planning

For the Football Club to provide the best support to player while in Club provided accommodation, Safeguarding, Care and accommodation planning requires a Club-wide, strategic, commitment and accountability.
Players requiring care and accommodation need to be placed with providers that recognise their talents and strengths of an athlete as well as their potential vulnerabilities as children and young people living away from their family homes at what is an important period in their development.

Parental responsibility holders and parents are expected to play a vital role in the care and accommodation planning at the start of the season to help the Club best place the player. In order to do this the Club will arrange home visits to gather and gain information and background knowledge of each player going into Club provided accommodation. Parental responsibility holders and parents will be given relevant information about decisions and accommodation placements.

Academy Players will play a vital role in care and accommodation planning with their wishes and feelings being sought routinely.

The direct accommodation provider will have complete rigorous process to determine their suitability. Providers play a significant role in supporting the players and Club to achieve their respective goals and are therefore partners in the care and accommodation planning process.

Clubs play the central role in the care and accommodation process, Clubs do not acquire parental responsibility but as the party who decides whether to accept a child or young person into the Academy and who will determine the suitability of the Accommodation provider, they have considerable responsibility and duty of care to all.

The Club care and accommodation planning process is;

- Ensure that all parties are treated in an open and transparent way
- Provide clarity about the responsibilities of each party; and
- Makes it easy to see whether the care and accommodation provider supports the player.

Parental Responsibility and Delegated Authority

A person who has parental responsibility may not surrender or transfer their parental responsibilities. A person with delegated may only do what they are authorised to do, for instance, in an emergency they can and should do what is reasonable to keep the child safe. Arrangements for delegating authority should be recorded in the Care and Accommodation plan, however the arrangement is not legally binding, and the parental responsible can remove the player from the care and accommodation setting.
Delegation of authority does not relive the parental responsibility from the parental holder of liability.

The Club will identify a range of situations in which the Club can authorise for Players to part take, these situations will be asked to the parental holder and if they wish to delegate authority to the Stipulated Club staff member (Safeguarding and Academy Manager). These will include;

- **Medical and Health;** registering the player with a local GP in Peterborough. Registering the player with a local dentist. Identifying a local Opticians. Decisions on any form of medical treatment from a GP or dentist will not be done without the further permission of the parental holder.
- **Social;** authority to grant social outings such as, team meals and activities arranged by the Football Club.

At the end of each season all accommodation providers will be offered the opportunity to notify the Football Club if they wish to continue providing accommodation to players. Once the information has been received all providers will be reviewed prior to the new season starting. This review will be for the Club to complete a full person and house review to understand and check the continued suitability to provider accommodation to Club players. The review will be undertaken by the Head of Club Safeguarding and Professional Development Lead Phase, this is so there is appropriate knowledge and experience in reviewing the providers.

Allegations against care and accommodation providers
An allegation is an assertion from any person where an accommodation provider has;

- Acted, or failed to act in a way that has caused significant harm to a player

Or

- Committed a criminal offense

Or

- Otherwise behaved in a way that indicated that they pose a risk of harm to a player.

An allegation differs from general complaint as an allegation must be investigated with the involvement of the local authority in whose area it is to have knowledge of accommodation residents.

The Football Club have comprehensive policies and procedure in place in which they would come into play in the event of an allegation against a provider.

When allegations are made the Football Club will consider;

- Police investigation of possible criminal offense
- Enquiries and assessment by children services to determine whether the player is a child in need of protection or in need of services.

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CLUB POLICY·

Safeguarding 2026-2027

Safeguarding allegations against staff

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 safeguarding allegations against any staff dependent on the current situation and all the circumstances surrounding the allegation.
The policy is to be always adhered to when dealing with an allegation, but in each case must be adapted to suit.

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.

Procedure

All safeguarding allegations made against staff should be reported immediately to any member of the Peterborough United safeguarding team who will refer it through to the Head of Club Safeguarding.

The Head of Club Safeguarding will inform the Senior Safeguarding Manager and Human Resources of the allegation, the Football Club will then conduct a full investigation which will be conducted by the Head of Club Safeguarding. The investigation report will be handed over to the Senior Safeguarding Manager and Human Resource who will make the over conclusion and decision.

Complaints about the Head of Safeguarding should be reported to the Senior Safeguarding Manager.

Complaints about the Senior Safeguarding Manager should be reported to a member of the Peterborough Untied Board.

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.

All allegations against staff will be referred through to The FA safeguarding team and EFL safeguarding team and the designated officer at the local authority.
The governing bodies will the inform us of;

- more information is required; or
- no further actions are needed from them, and the Club can continue their investigation; 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.
The investigating team will be put in place by the Football Club, this will include:

- the investigating officer, this is normally the Head of Club Safeguarding, they will;
- investigate fully, while seeking guidance and support from the Football Club's HR manager
- put together a full case report
- issue the final case report to the investigation to Senior Safeguarding Manager and HR, they will;
- read the full case report
- 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

<u>Supporting those involved</u>

The person(s) who makes the allegation and where the allegation reporter is a child 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.

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 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. *[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.]*
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.

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 policy is to suspend a member of staff who has had a safeguarding allegation made against them. This is for the protection of the staff member.
In the case of suspension, the employee will be asked to attend a meeting with the Head of Club Safeguarding and their line manager where they will receive written confirmation of the suspension, assign a member of staff and informed of their expectations while on 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.

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 child will be kept in the confidential section of their record on MyConcern.

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All information related to safeguarding allegations against staff at Peterborough United Football Club is store with HR.

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.

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.

Anti-Bullying

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 them, and so is less able to defend themselves. Bullying usually happens over a period and consists of a series of different incidents. Bullying is a behaviour in which an individual(s) makes 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
- 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.

Principles for handling bullying:

- All reports or witnessing of bullying will to be taken seriously. All reports or concerns will be logged onto MyConcern.

- Staff will work with the person to ensure that they feel safe
- Staff will work with the perpetrator 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, they 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.

<u>Procedure:</u>

Recording of incidents:

- Report bullying to any Peterborough United staff who will raise a cause for concern through the online safeguarding portal MyConcern
- A DSO will be assigning to the concern and continual record will be store and updated all the process through MyConcern.

Example of disciplinary steps:

- Step 1 - the perpetrator will be warned officially to stop offending
- Step 2 – where necessary and appropriate the perpetrator 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 perpetrator will be asked not to attend a Peterborough United event for a fixed period (usually 1 week).
- 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 perpetrator

Safeguarding Complaint

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 in regard to safeguarding
- Failure to provide a service in regard to safeguarding
- The quality of our facilities in regard to safeguarding
- Unfair treatment or inappropriate behaviour by a member of Peterborough United staff in regard to safeguarding.

- 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 cannot 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

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 can try be resolved.

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 safeguarding 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 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.

Data Protection in Safeguarding

The Football Club takes the matter of data protection seriously in respect of adults at risk.
The Club will apply the principles set out in the General Data Protection Regulation (GDPR) and other current relevant data protection legislation including the Data Protection Act 2018 in respect of our data collection activities. Further information is contained in the Club's Data Protection Policy & Privacy Notice.
Where any form of data is collected relating to an adult at risk, we will endeavour to obtain agreement for the use of such data from the adult concerned.
We will seek the consent of the adult or parental consent in relation to a child if, the collection or use of information is likely to result in:

- Disclosure of an adult at risk's name and address to a third party, for example as part of the terms and conditions of a competition entry or partnership activation
- Use of a adult at risk's contact details for marketing purposes
- Publication of an adult at risk's image on a website that the public can view (subject at all times to the Club's terms and conditions relating to access to Weston Homes Stadium on matchdays) or
- The collection of personal data about third parties, for example where an adult at risk is asked to provide information about his or her family members or friends.

In the event a family member of an adult at risk or the adult at risk themselves asks for a photograph to be removed, this shall be done without delay.

Equality

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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 approved by Elizabeth Elsom, Club Operations Manager/Senior Safeguarding Manager/Board Member 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 that they are able to work and watch football in an environment without the threat of intimidation, victimisation, harassment or abuse.

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.

Legal rights

Discrimination has been legally defined through a series of legislative acts, including the Race Relations Act, the

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Sex Discrimination Act, the Disability Discrimination Act and the Equality Act 2010.

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.

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.

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 safeguarding@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.

Furry Mascot

Within our football club we have Peter Burrow our friendly furry 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

- Enhance the spectator experience and represent the Club as a positive role model
- Each mascot is accountable for their own behaviour at all times
- Ensure the mascot uniform is returned to the Club in good condition
- To only use the mascot uniform when representing Club activities
- If invited to away matches stay in the stadium end appropriate to your team (or follow the guidance provided by club officials)

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- To follow instructions given by the Club's safeguarding team
- Attend pre and post-match briefings as required
- Provide crowd entertainment on match days before the match and at half time
- To attend additional training as required

Code of Conduct

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

- Complete a Football Club DBS Check
- Ensure that any direct contact with children or adult at risk is appropriate and in an open environment
- Avoid direct contact with children and adults at risk. Handshakes and waves are very appropriate, hugs should not be initiated
- Ensure that hands are always visible, hand contact should be on shoulders only - staff can assist in this by prompting 'give us a wave!' for any photographs
- Report any concern / allegation or disclosure concerning risk or harm to children or adults at risk to the a member of the Safeguarding team.
- Follow the Club's policies and procedures for Safeguarding and protecting Children and Adults at Risk
- Abide by the relevant Rules and Regulations of the EFL and the Football Association ("the Rules and Regulations")
- Maintain a responsible and co-operative attitude and uphold the ideals of fair play and sportsmanship
- Show a positive and responsible attitude towards everyone involved in football
- Be a responsible ambassador of the Club
- Recognise the referee and their assistants are the symbol of authority and always treat them with respect
- Promptly obey any instructions given by the referee, assistant referee or any fourth official
- Promptly comply with any instructions given by a steward, security team or the police
- Attend training and learning opportunities as required by the club
- Be always responsible and accountable for their own behaviour
- Inform the DSO of any change in health status which may affect their ability to perform your duties
- Inform a member of the safeguarding team immediately if they become the subject of any external safeguarding concerns or investigation

Furry Mascot Must Not:

- Act in an inappropriate manner with any child or adult at risk
- Hold children for health and safety reasons – the parent/guardian should hold the child and then approach the furry mascot
- 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
- Approach children – always let them come to you
- Influence, incite or condone unacceptable behaviour
- Criticise or disrespect officials, opponents, coaches, other Mascots or fans
- 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
- Attempt to question or influence any decision made by a referee or assistant referee
- Approach or attempt to communicate with any player, coach or club official either of their own team or opposing team
- Interfere with any pitch equipment including, but not limited to, the goals, the ball, corner flags etc.
- Wear, use or lend the mascot uniform at any time without the express consent of the Club

- Engage in any behaviour that is likely to cause offence or distress to any individual or sections of the crowd
- Operate around the area where the opposing fans are situated
- 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 a member of the Safeguarding team.

Information Communication and Technology in Safeguarding

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 players regarding safer internet/social media use in respect of their position (and additional vulnerabilities) as professional/ 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.

Email

The email policy is to provide a framework to ensure that there is continuity of procedures in the usage of internet and e-mail within the Club. The internet and email system have established themselves as an important communications facility within the Club 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. The use of the email 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 Club 's position on the correct use of the email system.

Procedures - Authorised Use

- unauthorised or inappropriate use of the email system may result in disciplinary action which could include summary dismissal.
- the email system is available for communication and matters directly concerned with the legitimate business of the Club. Employees using the email system should give particular attention to the following points:
- all comply with Club communication standards
- email messages and copies should only be sent to those for whom they are particularly relevant

- email 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
- if the email is confidential the user must ensure that the necessary steps are taken to protect confidentiality. The Club will be liable for infringing copyright or any defamatory information that is circulated either within the Club or to external users of the system;

and

- offers or contracts transmitted by email are as legally binding on the Club as those sent on paper
- The Club will not tolerate the use of the e-mail system for unofficial or inappropriate

purposes, including:

- any messages that could constitute bullying, harassment or other detriment;
- personal use (e.g. social invitations, personal messages, jokes, cartoons, chain letters or other private matters);
- on-line gambling;
- accessing or transmitting pornography;
- transmitting copyright information and/or any software available to the user; or
- posting confidential information about other employees, the Club or its clients or suppliers.

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 Club 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 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:
- comply with all of our internet standards
- access during working hours should be for business use only
- private use of the internet should be used outside of your normal working hours
- the Club will not tolerate the use of the Internet system for unofficial or inappropriate purposes, including:

- accessing websites which put our internet at risk of (including but not limited to) viruses, compromising our copyright or intellectual property rights
- non-compliance of our social networking policy
- connecting, posting or downloading any information unrelated to their employment and in particular pornographic or other offensive material
- 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 may constitute a criminal offence.

Monitoring

We reserve the right to monitor all email/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 such as social media to ensure safeguarding procedures are met. Information acquired through such monitoring may be used as evidence in disciplinary proceedings.

Social Media

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, 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 upmost importance to keep personal and business matters separate.

Peterborough United advice 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 are 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 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.

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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.

Messaging children 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
- WhatsApp
- email
- instant messaging or through social networking sites
- Teamworks

All communications with Under 16's must be done directly through parents.

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 emails which should always be sent from work.

All contact must relate to Club activity and your own personal details should never be discussed. Discussions with children 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 or adults at risk should be transparent and accountable.

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

Children

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 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

If you are worried or want to raise a concern you can do so to a member of the Club's safeguarding team.

Parent/Carers

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/

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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.

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

First Team Match Day's – missing/lost child or adult at risk

Lost or missing children or adult at risk

The purpose of this procedure is to ensure that children or adults at risk is lost 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 adults at risk. The club has stewards who are Safeguarding champions – there will be one in each stand of the ground.

Peterborough United will provide a manned lost person point throughout the fixture. Peterborough United's lost person point is 'Reception' in the main stand unless it is safer to keep the child in the current area (The Safeguarding team and Control room will make the decision regarding this). Reception is staffed during the entire event by receptionists, controlled by CCTV, stewarded at all points.

To safeguard the welfare of a lost/found child or adult at risk 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.

Peterborough United will make sure that all members and volunteers know where to take a child or vulnerable adult who have lost their parent / carer or the person looking after them. This is also included within the Safeguarding Steward briefing document issued at every home game.

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 control room must be notified immediately, they will deploy the match day safeguarding officer.

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If lost children, parents separated from their children, adults at risk or carers of adults at risk 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 match day safeguarding will notify the control room for all personnel to stand down.

Children or adults at risk found without their parents/ carers;

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

If a child or adult at risk 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 match day safeguarding officer will remain with them.
The child or adult at risk 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 by the match day safeguarding officer 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 adult at risk

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

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

Depending where the child or adult at risk 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 or Adult at Risk;
Staff should reassure parents/guardians and/or carers who are making a notification of a lost child or adult at risk that a search will be organised by 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 adult at risk – name, age, sex, ethnic origin, hair colour, build, clothing, location last seen and who they were with.

Parents/guardians and/or carers should be encouraged 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., this needs to be conducted so both parties can share information if one party finds the child or adult at risk.

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 after a period of time at the discretion of the safety officer. 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 4th official must be notified. Although this isn't a fixture related problem, the 4th 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.

When the child or adult at risk is found, they will be led to the Reception in Main Stand to be re-united with their parent or carer. The match day safeguarding officer will then notify control if they are already aware.

Re-Uniting parent/guardian with children/ venerable adults;

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

They should be required to provide details – name, age, address, who they are in relation to the child or adult at risk (including name), and a description of the child's or adult at risks 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 or adult at risk they should request The Safety Team and or match day safeguarding officer is to contact a Police Officer for assistance.

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.

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.

Late collection – Monday to Sunday (Academy)

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Rationale

If an authorised person does not collect a child or adult at risk, our aim is to resolve the situation causing as little distress to the child or adult at risk as possible.

Procedures

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

If we are informed, you are late then two members of Club staff will remain with the child or adult at risk.

If there is a change to the proceedings of the collection of a child or adult at risk, we ask parents / carers to notify us immediately.

What will happen if the Club are unable to contact

If the Club are unable to contact an authorised adult to collect the child or adult at risk 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. The Safeguarding member if it is not already the Head of Club Safeguarding will make contact to notify them for advice and guidance. A member of the safeguarding team if not already on site will attend site and will be instructed to contact social services. Two members of staff will then accompany the child or adult at risk there. Social service will then take over from the Football Club. Under

no circumstances will staff go looking for the authorised adult or take the child home. A full report of the incident will be written up and issued Safeguarding Team.

Missing child or adult at risk

At Peterborough United Football Club, we follow the outlined missing person's procedure at any trip/tour, Academy activity or Club travel;

- Ensure the safety and supervision of the rest of the group that are in attendance
- Retake the register
- Inform a member of the Safeguarding Team
- Ensuring the safety of the rest of the group, do a controlled local search
- Remain calm

If after a period of fifteen minutes the child or adult at risk has not been located;

- Contact their parent / guardian if necessary (all staff/ volunteers in charge will hold a contact list for all children or adults at risk in their care)
- Inform the police and handover

Prevent

Peterborough United Football Club recognises and promotes the importance of British values. It is key to build resilience to radicalisation on every level throughout the Football Club allowing every child or adult at risk 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.

Peterborough United is responsible for the welfare of all children and adults at risk 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 or adults at risk 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 need 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 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 Head of Club Safeguarding immediately and they will report this to the appropriate authorities.

Transport

As a primary source of transport Peterborough United use Club minibuses for the transport of Players and Staff (Separate transport policy is ion place). These vehicles are serviced regularly through the minibus hire company 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, it is preferred that it is a Club company vehicle or Club hire vehicle. In the vent of this happening staff must travel in pairs.

As a last resort where a member of staff needs to transport a player in their own personal car they must have authorisation from their line manager and a full UK driving licence and hold an in date business insurance certificate. You must ensure that on these occasions there will be more than one member of staff present in the vehicle.

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 Peterborough United staff will always be present at the station to ensure all players get into the taxi's safely and to deal with any issues should they arise. Should a player be running late, parents / guardians are to let the Youth Development Phase Lead Coach. It is the responsibility of the parent/guardian to notify the school if the player is going to miss their registration period.

All Foundation Phase and Youth Development Phase players are required to make their own way to training and games unless this is authorised by the Academy manager, Head of Safeguarding or Transport Manager. 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 as well as undertake a short driving test with the transport manager. 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.

All 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 the other road user or attending police officer their name and address and the Club name and address and company insurance details, along with any other information within reason that is required from them. accident. In the event that damage is caused by another motorist to a Peterborough United Club vehicle, or an injury is sustained to Club staff/players travelling in these vehicles insurance details and contact information must be gathered from the other party involved in the incident. In the event of a minor being injured the Head of Club Safeguarding must be notified immediately.

If 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.

<u>First Team away game travel</u>

Peterborough United operate a coach service for fans to first team away fixtures. This operation is run by Forever Posh but overseen by the Club.

The coach company use is a preferred contractor, and all personnel (passengers and staff/travel lead) are required to follow any policies also in place by the coach company. In the event of an emergency staff/travel lead are to take instruction from the coach company and assist where possible.

Each travelling coach will have a designated member who is assigned to be travel lead within that coach. This person will hold a list of attending passengers travelling on their coach. This list will hold information for in the event of a safeguarding emergency;

- Passenger name
- Passenger contact number
- Emergency contact name
- Emergency contact number
- Allergies
- Medical information (such as requires insulin)

A register must be taken prior to the coach departing any given location that has required a stop and the for the passengers is disembarked.

This member of staff will have contact with the travelling attending Police Officer in charge at that fixture to enable continual communication and police support if required.
Peterborough United have the right to refuse travel/terminate travel to any person/s who is;

- Drunk and disorderly
- Abuse
- Threatening
- Under the influence of drugs
- Displays inappropriate conduct

This list is by no means exhaustive but shows the matters that would meet refusal/termination of travel.
In the event of any safeguarding issues, the relevant Club policies will come into effect.

No child under the age of 14 can purchase coach travel or travel alone on a Club coach without an accompanying adult.

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

If 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.

Whistle Blowing

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

Qualifying Disclosure

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:

- committing a criminal offence;
- failing to comply with a legal obligation;
- a miscarriage of justice;
- endangering the health and safety of an individual;
- environmental damage; or
- concealing any information relating to the above.

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 Club will take any concerns that you may raise relating to the above matters very seriously.

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 must be "in the public interest". We encourage you to use the procedure to raise any such concerns.

Procedure

In the first instance you should report any concerns you may have to the Head of Club Safeguarding or member of the safeguarding team who will then inform the Head of Club Safeguarding. Your concern will treat the matter with complete confidence.
Relevant Club Safeguarding policies dependant on the nature of the whistle blowing concern will then come into effect.

Treatment by Other

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.

Mandatory Reporting

At present this is under consultation and part of the Crime & Policing Act 2026, ALL sexual abuse concern are to be reported and will be a mandatory

Safer Recruitment

Peterborough United Football Club recruits safely and has in place robust safer recruitment processes 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 statuary requirements of the Equality Act 2010
- Treat all applicants fairly and consistently

Procedures

At Peterborough United Football Club, we are vigilant in our recruitment procedures. We follow this procedure in all our recruitment processes.

Identification of recruiting panel

- We have a minimum of two people on our recruiting panel where possible. 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.

Advertising

- We use the Peterborough United website to advertise any new vacancies plus other job boards
- HR manager will also consider the following outlets for advertising vacancies to ensure we attract applications from a diverse pool of people and to best represent our workforce:

    1. Kick It Out (info@kickitout.org)
    2. Level Playing Field (info@levelplayingfield.org.uk)
    3. Women in Football (jobs@womeninfootball.co.uk)
    4. Pink Jobs (Click Here)
    5. Sporting Equals (Click Here)

- All our adverts include the PUFC '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 Disclosure and Barring Services Check (DBS/CRB) and other background checks.

Job application pack / recruitment materials

- Any person enquiring about the post will be able to obtain the role information on the PUFC vacancies page on the Club website, this will include:
- Job description/person specification
- A copy of our recruitment and selection policy (this document)
- All applicants will apply with an application form,
- Alternative formats or routes to apply can be provided upon request and any access requests for interview should also be raised at the application stage.

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

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Interview stage

- Interviews will be face to face, by telephone or sometimes via MS Teams video call.
- A minimum of two people, one will be safer recruitment traiied usually the manager and the deputy/Head of Safeguarding, will attend the interview panel. Both will be involved in the overall decision making at least one person will hold their safer recruitment qualification in lines with KCSIE 2024.
- At the interview, each candidate will be required to prove their identity against photo ID (for example a passport, birth certificate or driving licence) 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 and will be scored in accordance to the criteria.
- 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 DBS 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.

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 requested before employment commences.
- Referees will be sought directly from the referee. References or testimonials provided by the candidate will never be accepted.
  Work references will be required to be supplied via a work email address. Work references supplied from a personal email address will not be acceptable
- Referees will always be asked specific questions about
- the candidate's suitability for working with children and young people any disciplinary warnings, including time expired warnings that relate to the safeguarding of children
- the candidate's suitability for the new post
- Online digital checks will be carried out
- 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 is returned and acceptable to the Club
- All qualifications will be checked against actual certificates and copies taken for their personnel files.
- **Inductions**

- 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.

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- As a minimum, new staff member will be provided with a copy of the following:
    - Equality Policy
    - Safeguarding Policy
    - Health and Safety Policy
    - 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.
- Any reasonable adjustments to the working environment or working pattern should be discussed with the manager during the induction period.

This policy has followed legislation and guidance from.

- The Children Care Act 1989 (amendment 2014)
- The Equality Act 2010
- Mental Capacity Act 2005
- Keeping Children Safe in Education 2021
- The English Football League
- The Football Association
- NSPCC
- Keeping Children Safe in Education 2024
- Prevent 2013
- Keeping children Safe in Education update 2026
- Crime & Policing Act 2026
- Working together to Safeguard Children 2015/2026
- Dometic Abuse act 2021

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21 Dealing with Concerns in a Football setting at Peterborough United Football Club

