

NFFC & NFF SAFEGUARDING POLICY

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Valid from	Valid to	Version	Status	Owner	Approval	Description of change
01/25	01/26	2.0	Retired	HoS	SSB	New policy and clauses
01/25	01/26	2.1	Live	CD	HOS	Reviewed by LA DSL Auditor
09/25	09/26	3.0	Live	HoS	SSB	Joint Policy with Trust. Section 11 on Data removed to create separate policy. Appendix 4 updated.
01/26	09/26	3.1	Live	HoS	-	Minor adjustments to the self-declaration requirements
Scope:				All Nottingham Forest employees, workers, volunteers and contractors.		
Other relevant documents:				Workforce Development Plan; Recruitment Policy; Low-Level Concerns Policy; Disciplinary Policy; Social Media Policy; eSafety Policy; Anti-Bullying Policy; Complaints Policy; Code of Conduct; Scouts Code of Conduct; Managing Allegations Against Staff Policy; Whistleblowing Policy; IT Policy; Risk Management Policy; Prevent Strategy; Due Diligence Policy; Care and Accommodation Policy; Behaviour as Communication (Guidance)		

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1. OVERVIEW

- 1.1 The purpose of this policy is to inform all stakeholders of Nottingham Forest Football Club (the “Club”) and our Foundation (the “Foundation”), jointly referred to within the policy as the “Organisation”, of our safeguarding commitment. This policy reflects our organisational standards and expectations to help make sure every child, young person and adult at risk¹ is safe and protected from abuse, neglect or exploitation.²
- 1.2 All individuals involved with the Organisation have responsibilities for the welfare of children, young people and adults at risk in our activities and are bound by this policy.
- 1.3 Nottingham Forest recognises that abuse, neglect and exploitation can happen anywhere, and we promote a proactive response within the Organisation when dealing with safeguarding concerns.
- 1.4 Nottingham Forest is committed to taking swift, proportionate and effective action, where appropriate, and making defensible safeguarding decisions.
- 1.5 The Club employs a Head of Safeguarding (HoS) and the Trust employs a Safeguarding Manager (TSM) who are responsible for supporting and challenging safeguarding procedures across the Organisation.
- 1.6 The Organisation has an appointed Senior Safeguarding Leads (SSLs) who are responsible for safeguarding governance and oversight within their organisational area (Club or Trust).
- 1.7 This policy does not form part of any contract of employment or contract to provide services, and we may amend it at any time.

2. SCOPE OF POLICY

- 2.1 We take our safeguarding obligation very seriously in respect of children, young people and adults at risk. All members of our staff and stakeholders have a duty of care towards children, young people and adults at risk, with whom they come into contact with during their role within the Organisation to keep them safe.
- 2.2 This policy applies to all staff and stakeholders of Nottingham Forest Football Club and Nottingham Forest Foundation, including third parties, commercial partners, license holders, contractors, consultants and trustees.
- 2.3 This policy relates to the operations of Nottingham Forest Football Club and Nottingham Forest Foundation. The Head of Safeguarding provides safeguarding oversight and governance across the Club and Trust.
- 2.4 The Organisation acknowledges its duty of care to safeguard and promote the welfare of children, young people and adults at risk and is committed to ensuring safeguarding practice reflects statutory requirements and guidance. Such as the Children Act (1989) and Working Together to Safeguard Children. The Organisation strives towards best practice and complies with Premier League, Premier League Charitable Fund and FA safeguarding standards and rules.
- 2.5 The Organisation expects all staff and stakeholders to understand their safeguarding responsibilities and to promote a safe environment for children, young people and adults to flourish and thrive.

¹ See Appendix 1 for Definitions

² See Appendix 2 for Types of Abuse and Indicators

3. AIMS

3.1 This policy has the following key aims:

- To safeguard all children, young people and adults at risk who interact with the Organisation.
- To demonstrate best practice in safeguarding.
- To increase awareness and understanding of our safeguarding duty across the Organisation.
- To provide guidance and support for staff, stakeholders, parents and other interested parties to understand our commitment to safeguarding and our reporting processes.
- To ensure that staff, stakeholders and parents understand the requirement to report concerns about any adults or their conduct when working with children.
- To promote high standards throughout the Organisation in accordance with our Code of Conduct Policy.

4. REVIEW

4.1 This safeguarding policy is applicable to the season 2025/26 and will be reviewed annually.

4.2 This policy will be independently reviewed every year by a safeguarding lead, which will be recorded on the document version control.

5. ROLES AND RESPONSIBILITIES

5.1 It is the responsibility of every staff member and stakeholder to ensure they always uphold the requirements of this policy and work in a way that will safeguard and promote the rights, safety, dignity and wellbeing of all children, young people and adults at risk. This will include:

- To provide a safe environment for children, young people and adults at risk whilst working in Organisation-related activities.
- To remain vigilant whilst working for the Organisation for any behaviours or safeguarding concerns.
- To apply the principles of safer working practices and codes of conduct when delivering activities or representing the Organisation.
- Take the appropriate steps to ensure any suspicion or allegation of abuse, maltreatment, poor practice, neglect or exploitation is taken seriously and reported appropriately.

5.2 In accordance with the Premier League's Safeguarding Standard 2, Nottingham Forest has employed a dedicated full-time Head of Safeguarding (HoS) whose sole responsibility is to oversee and implement strategic and operational safeguarding standards across the Club and Trust (for full HoS roles and responsibilities please see appendix 4). In accordance with the Premier League's Charitable Fund Capability Codes of Practice (CCOP) the Trust has employed a dedicated Safeguarding Manager (TSM) to ensure effective management and oversight of all safeguarding concerns across the wider Foundation.

5.3 The Club has employed a Chief People Officer and The Trust has employed a People Manager who operates as the Organisation's Safer Recruitment Lead, who are

responsible for ensuring compliance with its safer recruitment policies and procedures.

- 5.4 To support the HoS and to raise the safeguarding awareness across the Organisation, Nottingham Forest has created a 'Safeguarding Team'. This team includes a full-time Academy Safeguarding Manager, Women's Sport Safeguarding Lead, Designated Safeguarding Officers (DSOs) and Safeguarding Champions (please see Appendix 4 for full DSO roles and responsibilities).
- 5.5 Nottingham Forest is dedicated to making safeguarding a golden thread in every aspect of the Organisation's operations. Safeguarding is reflected at every level of the Organisation, including the Senior Safeguarding Lead (SSL) being at Board level.
- 5.6 The SSL ensures that safeguarding is a key priority at the Organisation and is responsible for providing Organisation-wide strategic leadership that assists the Organisation to deliver the safeguarding strategy, vision, values, priorities, policies, promoting the welfare of vulnerable groups, and communicating at executive level.
- 5.6 The SSL is the Chair for the Organisation's Strategic Safeguarding Board (SSB), which meets quarterly, and where all safeguarding operations and practices across the Organisation are reviewed.
- 5.7 Members of the Board receive safeguarding training including the Premier League's Safeguarding Leadership, Governance and Culture Training within two months of appointment to ensure that they may effectively:
 - Monitor and challenge those with specific safeguarding and child protection responsibilities.
 - Review anonymised safeguarding reports from the HoS about safeguarding concerns, allegations, risks, and patterns and trends.
 - Evaluate anonymised safeguarding cases to determine whether or not they have been investigated/dealt with appropriately and a referral to statutory partners has been made if required.
 - Review at least annually safeguarding audits and implementation plans, identifying progress made on any previous recommendations and areas for improvements and action to enable monitoring, oversight, scrutiny and challenge and to enable support to address any areas of difficulty.

6. TRAINING

- 6.1 All staff will undertake a specific safeguarding training as part of their induction upon employment at the Organisation.³ A 'Staff Guide to Safeguarding' handbook will be provided at the induction training for further guidance and support.
- 6.2 The safeguarding and safer working practices induction will be delivered by the HoS, TSM, or a member of the Safeguarding Team.
- 6.3 All staff employed in 'regulated activity'⁴ will be required to read 'Keeping Children Safe in Education',⁵ the Organisations Prevent Strategy and Safeguarding Policy. Full-time staff employed by the Club will also be required to read Premier League's Guide to Safer Working Practices.

³ Refer to the Safeguarding Workforce Development Plan for more information

⁴ [New disclosure and barring services - GOV.UK](https://www.gov.uk/government/publications/new-disclosure-and-barring-services)

⁵ [Keeping children safe in education - GOV.UK](https://www.gov.uk/government/publications/keeping-children-safe-in-education)

- 6.4 All permanent staff upon employment in 'non-regulated activity' will be required to read our Prevent Strategy, Codes of Conduct and Safeguarding Policy irrespective of role.
- 6.5 All permanent staff are required to sign an acknowledgement that they have read and understood all mandated policies and procedures. These documents will be continually updated and available for all staff on our internal people platform 'Bob' (the Club) or 'Breathe' (the Trust).
- 6.6 All staff in a regulated activity-type role will complete safeguarding courses as detailed in our Workforce Development Plan.

7. SAFER RECRUITMENT

- 7.1 The Recruitment Policy sets out in detail the safer recruitment processes the Organisation undertakes in ensuring staff are suitable to work with children and adults at risk. A copy is available on the internal intranet Bob (the Club) or Breathe (the Trust).
- 7.2 Whilst full details of the Organisations recruitment process are detailed in our Recruitment Policy, key elements with regards to safeguarding are:
 - All staff working in regulated activity require an Enhanced Disclosure and Barring Service (DBS) check⁶
 - Interviews are structured and consistent for all candidates and must include at least 2 questions from the agreed safeguarding question set.
 - Two references must be provided, ideally two professional ones, although one character reference will be accepted if an individual does not have more than one professional referee.
 - A physical check of identification during the recruitment process and the day of their employment.
 - Right to Work Check⁷
 - Qualifications check (if applicable).
 - Overseas check (if applicable).
- 7.3 All offers of work are subject to a satisfactory outcome of the rigorous screening process and until such time that all background checks are deemed acceptable by the Organisation, the person concerned is not permitted to commence work.
- 7.4 The Organisation will undertake risk assessments where content disclosed on a DBS disclosure is relevant to the job requirements.
- 7.5 Failure to satisfy the Organisation's, Premier League and PLCF requirements may lead to the job offer being withdrawn or, if they have already started employment, summary termination of the employment.
- 7.6 All staff working in regulated activity roles will have to undertake a new enhanced DBS check with the Organisation. They cannot commence employment with the Organisation until their new disclosure comes through.⁸
- 7.7 When the Organisation uses suppliers or agencies to undertake its work, they are subject to a Service Level Agreement (SLA) and the Contractors Safeguarding Policy. They will also be required to complete our safeguarding due diligence checklist.

⁶ Disclosure and Barring Service - GOV.UK

⁷ Check a job applicant's right to work: use their share code - GOV.UK

⁸ Refer to our Safer Recruitment Policy for more information

- 7.8 Club staff who require a basic, standard, or enhanced DBS check as part of their role, will be required to submit an annual self-declaration form and undergo a new DBS check every 3 years throughout the individual's association with the Club.
- 7.9 Where an individual moves role internally with the Organisation, that role change may trigger the need for a DBS check to be completed, or a different level of check to be completed and the individual will be informed of this as part of the recruitment process. An individual will not be able to move into that role until the relevant check has been completed, and the individual is cleared for work.

8. RESPONDING AND REPORTING TO SAFEGUARDING CONCERNS

- 8.1 Nottingham Forest is a child-centred organisation and will always act in the best interests of all children, young people and adults at risk and have a responsibility to act as outlined in this policy.
- 8.2 All staff must know the early indicators of abuse, neglect and exploitation and show professional curiosity when dealing with children, young people and adults at risk (see appendix 2 for a list of indicators).
- 8.3 The Organisation is committed to capturing the voice of all children, young people and adults at risk across the organisation and offers a range of ways in which to do so, including the use of 'worry boxes', MyVoice⁹ and QR codes.
- 8.4 All staff and stakeholders have a responsibility to ensure the safety and welfare of children, young people and adults at risk and must take appropriate steps to ensure that suspicions and allegations of abuse are taken seriously and reported.
- 8.5 It is not the responsibility of anyone within the Organisation to decide whether abuse, neglect or exploitation has taken place. All staff should maintain the attitude of 'it could and is happening here' with regards to safeguarding.
- 8.6 All staff members and **stakeholders have a duty to report any situation where there is harm or risk of harm to a child, young person or adult at risk** or where any internal policies have been breached that this potentially exposes someone to harm, including:
 - The behaviour of a member of staff or stakeholder towards a child, young person or adult at risk.
 - The behaviour of a child or adult towards others, including child on child abuse.
 - Working practices that fall below the standards set in our Codes of Conduct policy.
 - Risks identified through our safer recruitment processes.
 - Risk identified through operational regulated processes (e.g. Health and Safety).
 - Information shared for safeguarding purposes from statutory agencies.
 - Any safeguarding concerns to a child, young person or adult at risk outside any Organisation activity but is reported or identified by a staff member or stakeholder. This is often referred to by LADO as a 'transferrable risk'.
 - Any disclosures by a child or young person that they have been a victim of FGM¹⁰, staff have a statutory duty to record the concern, notify the HoS or TSM, where they must inform the police.
- 8.7 Irrelevant of the perceived level of seriousness, all concerns must be reported. Low-level concerns are often indicative of a pattern of concerns or behaviours. These must be

⁹ <https://myvoice.thesafeguardingcompany.com/>

¹⁰ See Appendix 1 for definition

reported to ensure appropriate support and steps can be implemented to prevent the concerns and risk escalating. Further guidance can be found in our low-level concerns policy.

- 8.8 Parents, Guardians and Carers are provided with safeguarding information, including the contact details of the Head of Safeguarding, Academy Safeguarding Manager or Safeguarding Risk Manager. They are also provided confidential reporting mechanisms, such as MyVoice encouraging them to report any safeguarding concerns they may have.
- 8.9 All staff must have direct access to MyConcern¹¹ to report any concerns they may have. The Safeguarding Team are available to provide support, guidance and advice through the monitored inbox safeguarding@nottinghamforest.co.uk, but emailing the Safeguarding Team does not constitute as a safeguarding report or negate staff's responsibility to report directly on to MyConcern.
- 8.10 Failure by staff or stakeholders to report safeguarding concerns or policy breaches that exposes a child, young person or adult at risk to harm may result in disciplinary action.
- 8.11 If a member of staff or stakeholder suspects abuse, neglect or exploitation is taking place, or a report/allegation of abuse has been disclosed to them, the HoS or TSM must also (in conjunction with a direct MyConcern referral) be contacted as soon as possible.
- 8.12 However, it is recognised that in some situations, immediate action may be required by a staff member or stakeholder. If the nature of the concern, incident, allegation or disclosure is putting the child, young person or adult at risk concerned in immediate danger.
- 8.13 If your concern relates to the immediate safety or welfare of a child, call the Police emergency number (999 in the UK). If this is required, you must notify the HoS/TSM as soon as possible afterwards (see appendix 7 for reporting process diagram).
- 8.14 Any staff member or stakeholder must report and respond to allegations of abuse made against a child, young person or adult at risk via MyConcern in accordance with the reporting process diagram¹². This concern will be allocated by the HoS/TSM to a member of staff for further information gathering or referral to statutory agencies if appropriate. Staff should respond to the disclosure as detailed in appendix 5. Further guidance in dealing with child-on-child abuse is detailed in appendix 8.
- 8.15 If the concern, allegation, disclosure or incident is made by an adult at risk: If the adult at risk has the capacity to consent, they must have the opportunity to consent before any decision is made that affects team.
- 8.16 Any member of staff or stakeholder who does not feel that concerns about a child have been responded to appropriately and in accordance with the procedure outlined in this policy should raise their concerns with the HoS, TSM or the SSL.
- 8.17 Nottingham Forest applies the regulatory requirements of the Football Association and Premier League for the reporting of safeguarding concerns. When any concerns reach their referral thresholds, the Safeguarding Team are responsible for referring to the FA and PL within 24 hours.
- 8.18 In any circumstances where the Organisation and relevant authority disagree and escalation of concerns are required, the HoS/TSM will contact the local authority Children's or Adult service manager and utilise the local authority escalation process and complaints policy if required.

¹¹<https://login.thesafeguardingcompany.com>

¹² See Appendix 7

- 8.18 The HoS or TSM will review, refer or allocate the cases per our MyConcern Guidance and Procedure Policy.
- 8.19 Organisation staff should consult the Organisation's Whistleblowing policy for information on raising issues or concerns, where they do not feel an internal channel is appropriate.

9. CONTEXTUAL SAFEGUARDING

- 9.1 Contextual Safeguarding recognises that as children and young people grow and develop they are influenced by a whole range of environments and people outside of their family. Children and young people may encounter risk in any of these environments. Sometimes the different contexts are inter-related and can mean that children and young people may encounter multiple risks. Contextual safeguarding looks at how we can best understand these risks, engage with children and young people and help to keep them safe¹³. We recognise that within the Organisation we have football specific situations that require contextual safeguarding considerations.

9.2 Position of Trust

As a result of the roles and authority that some of the Organisation staff hold, they may be considered to be in a position of trust¹⁴ as provided for in the Football Association regulations. All staff who are in a position of trust must abide by these regulations and will be subject to relevant legislation.¹⁵

9.3 Open-Age Playing Considerations (the Club)

It may be required for players under 18 years old to either train or play with 18 and over football teams. Full details can be found in our 'NFFC Safeguarding Players Under 18 Playing in Senior Teams' Policy.

9.4 Scouts (the Club)

All Scouts undertaking work for the Organisation are registered with the Premier League.

Scouts who are responsible for identifying players under the age of 18 are issued with a copy of the Organisation's Code of Conduct for Scouts Policy and the Organisation's Safeguarding Policy, will be included in our safer recruitment process and will complete an enhanced DBS check.

All Scouts are required to undertake the FA Online Safeguarding Children Course.

Nottingham Forest only permits scouts from other Organisations to attend its academy games programme matches in accordance with the provisions of the Premier League Youth Development Rules.

9.5 Youth Loans, Trials and Work Experience (the Club)

If an Academy player under the age of 18 joins another Club on trial, work experience or a Football League Youth Loan, the Academy will seek written parental consent (additional to the standard consent sought at the start of every season) prior to the activity taking place. Consideration will also be given to the player's education programme, travel and accommodation arrangements.

If the new Club is not located within a reasonable travelling distance from the player's

¹³ [Contextual safeguarding | NSPCC Learning](#)

¹⁴ [The relationship of trust | The Boot Room](#)

¹⁵ [Sexual Offences Act 2003](#)

current address, the Club will request, where possible, to place players in host family accommodation. The Academy Safeguarding Manager will designate a member of Academy staff to check on the players on a regular (weekly) basis, not just for game situations but for their general welfare whilst on loan, trial or work experience.

For players under the age of 18 who are joining the Club on trial (including work experience) parental consent will be sought prior to the trial taking place, along with a full medical history and injury disclaimer.

Where accommodation is required during the trial period, U18 players must be accommodated with an approved & vetted host family whilst on trial with the Club, unless there are not available. In this instance an U18 player can stay at a hotel, but supervision is required for the duration of the trial, either by a member of the player's family or a responsible & appropriately DBS checked employee of the Club. Two U18 players can share a room, but for clarification an U18 cannot share with an adult age 18+ (including other players).

The same principle applies to overnight stays for U18/U21/B Team trips. However exceptional circumstances will be considered where 17 and 18-year-olds are on the same squad and wish to room together, where appropriate mitigations and consent can be established and implemented.

A risk assessment will be completed prior to any academy trips, tour or events, which will include safeguarding considerations. Refer to the NFFC Event Risk Assessment Guidance and the NFFC Safer Event Management (Trips and Tours) Guidance.

9.6 Managing Behaviour

Whilst we appreciate individuality and that some children, young people or adults at risk may behave in a way outside social norms. All behaviour issues and concerns will be dealt with in accordance with our Behaviour Policy and Behaviour Management Framework and we will consider all behaviour as a form of communication.¹⁶

¹⁶ Refer to our Behaviour is a form of communication guidance

10. PHOTOGRAPHY AND IMAGERY

- 10.1 Nottingham Forest recognises the use of photographs and imagery on website, social media, posters, within the press or other publications, can pose direct and indirect risks to children if they are not managed appropriately.
- 10.2 The Organisation takes its guidance on the use of images from guidelines issued by the FA and Premier League¹⁷.
- 10.3 Before taking images of children, young people or adults at risk, the child/young person's parent/guardians consent must be obtained. Parents/guardians are responsible for informing the Organisation of any change of circumstances which may affect consent.
- 10.4 Parents/guardians will be informed of how the image will be used. The Organisation will not allow an image to be used for something other than that for which it was initially agreed.
- 10.5 All children featured in Organisation publications will be appropriately dressed. Where possible, the image will focus on the activity taking place and not a specific child.
- 10.6 Where appropriate, images represent the broad range of people participating safely in the event. Designated Organisation photographers will, where applicable, undertake a DBS check and attend a Safeguarding Children workshop.
- 10.7 Any Organisation photographer will be responsible for keeping up to date with the latest guidelines detailed by the FA and the Premier League, the Organisations Safeguarding policy and will always wear Cub identification.
- 10.8 Children, young people or adults at risk who are subject to family, care or legal proceedings, or who are under a court order will not have their images published in any Organisation document, if the parent/guardian who has Parental Responsibility (PR) does not provide consent.
- 10.9 No images of children featured in Organisation publications will be accompanied by personal details.
- 10.10 Recordings of children, young people or adults at risk for the purposes of coaching aids are only filmed by Organisation officials and are stored safely and securely at the Organisation's premises/network.
- 10.11 If any staff member, stakeholder, parent, guardian or carer has any concerns relating to any photograph, photographer, image or pictures, they should report it via MyConcern or MyVoice in accordance with section 8 & appendix 7 of this policy.
- 10.12 If consent for a photograph is retracted then the image will be withdrawn.
- 10.13 All photographs and videos will be stored in accordance with our IT Policy and Data Protection Policy.

¹⁷ The FA Safeguarding, Section 8

APPENDICES

Appendix 1: Definitions

Abuse is the improper treatment of others. Harm will often be related to or arise from abuse or maltreatment of children, young people, or Adults at Risk. There are several forms of abuse defined in UK law, many relating to both children and adults: emotional (including bullying, hazing), discriminatory, financial, physical, neglect and sexual (including grooming). Financial abuse is something more usually related to adults but where professional (and future professional) footballers are concerned this is a significant area of risk. Types of abuse are further detailed in Appendix 2.

Activity (or activities) refers to any Nottingham Forest FC business operation or setting including football matches, events, coaching or education programmes, medical or sports science programme, football tours or other related activities where the Organisation has a responsibility (both direct or indirect) for the welfare and safety of individuals taking part.

Adult refers to any person aged 18 and over.

Adult(s) at Risk refers to adults (those who are 18 or over) who may have some form of additional vulnerability, including, but not limited to: disability, intellectual vulnerability, mental health condition and who may be unable to take care of themselves or unable to protect themselves against significant harm or exploitation from others. The organisation recognises that the legal position in respect of adults is complex, and any safeguarding intervention may require the consent of the individual prior to any action being taken.

Capacity refers to the ability to decide at a particular time, for example when under considerable stress. The starting assumption must always be that a person has the capacity to make a decision unless it can be established that they lack capacity under the Mental Capacity Act (2005).

Child/Children are any person under the age of 18, as defined in The Children Act (1989).

Child Abuse is when a child is harmed by an adult or another child – it can be over a period of time but can also be a one-off action. It can be physical, sexual or emotional and it can happen in person or online.¹⁸

Child on Child Abuse is Inappropriate behaviours between children that are abusive in nature including physical, sexual, or emotional abuse, exploitation, sexual harassment, all forms of bullying, coercive control, hazing/initiation rituals between children and young people, both on and offline (including that which is within intimate personal relationships)¹⁹.

Child Protection is part of the safeguarding process. It focuses on protecting individual children identified as suffering, or likely to suffer, significant harm. This includes child protection procedures detailing how to respond to concerns about a child.²⁰

Consent is the agreement or permission to do or allow something. Most activities involving children require the consent or approval of the child's parent.

Female genital mutilation (FGM) comprises all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reason²¹.

Harm means ill-treatment or the impairment of health or development including, for example,

¹⁸ Understanding child abuse: types, signs, and support | NSPCC

¹⁹ <https://safeguarding.network/content/safeguarding-resources/peer-peer-abuse>

²⁰ Getting started with safeguarding and child protection | NSPCC Learning

²¹ <https://www.who.int/news-room/fact-sheets/detail/female-genital-mutilation>

impairment suffered from seeing or hearing the ill-treatment of another.²²

Harmful Sexual Behaviour (HSB) is developmentally inappropriate sexual behaviour displayed by children and young people which is harmful or abusive.²³

Health means physical or mental health.

Parental Responsibility (PR) refers to those individuals with legal responsibility for a specific child. Where consent is required in respect of a child taking part in Nottingham Forest FC related activities, or reporting a concern, we will take all reasonable steps to identify the person(s) with legal PR for that child.

Regulated Activity refers to certain roles that involve working with children or vulnerable adults, such as teaching and providing care. Anyone who is on the Disclosure and Barring Service (DBS) barred lists cannot work in these roles.²⁴

Safeguarding is a term used in the UK and is a shortening of the phrase ‘safeguarding and promoting the welfare of children and adults’ and refers to:

- protecting children from abuse and maltreatment
- preventing harm to children's health and development
- providing support to meet children's needs when problems emerge
- ensuring children grow up with safe and effective care, within their family where possible
- taking action to enable all children and young people to have the best outcomes.²⁵

Significant Harm is the term to identify the threshold that justifies compulsory intervention in family life in the best interests of children.²⁶

Staff are employed or deployed by an Organisation or Foundation whether in a paid, voluntary, consultancy or third-party capacity.

Stakeholder is a term used to refer to any person who has an interest or involvement in the activity and/or the delivery of the activity, or the welfare of those taking part in the activity.

The Academy is the standalone Academy department within the Organisation which is responsible for nurturing and developing the Organisation’s future generations of players. The Academy is based at an independent site external to the Organisation’s City Ground. It is also the location of the Organisation’s Training Ground.

The Organisation refers to Nottingham Forest Football Organisation (including Nottingham Forest Netball), its staff and all the activities it undertakes. In certain circumstances it may also refer to third parties with an entrusted responsibility for delivering Organisation-supported activity.

The Organisation refers to both Nottingham Forest Football Organisation and The Nottingham Forest Foundation operating under the Nottingham Forest brand.

The Foundation is the Nottingham Forest Foundation, its staff and all the activities it undertakes. In certain circumstances, it may also refer to third parties with an entrusted responsibility for delivering Organisation-supported activity.

Volunteer is a person who freely offers their skills and expertise or takes part in a task, event or enterprise with the Organisation or Trust at their own expense in terms of time and/or resources.

²² Children Act (1989) S31(9) & (10)

²³ Hackett, S. (2014) Children and young people with harmful sexual behaviours. London: Research in Practice

²⁴ [What is Regulated Activity? | Children & Vulnerable Adults](#)

²⁵ [Getting started with safeguarding and child protection | NSPCC Learning](#)

²⁶ Children Act (1989) S47

Welfare is not defined in child protection law but includes considerations regarding the physical, emotional, educational needs of a child.²⁷



²⁷ <https://www.georgegreen.co.uk/site/george-green-blog/family-law/general-principles-of-child-law-the-welfare-principle>

Appendix 2: Types of Abuse and Indicators

The main 4 types of abuse are:

Physical abuse is when someone hurts or harms a child or young person on purpose. It includes hitting with hand or objects, slapping and punching, kicking, shaking, throwing, poisoning, burning and scalding, biting and scratching, breaking bones, drowning. Physical abuse is any way of intentionally causing physical harm to a child, young person or adult at risk. It also includes making up the symptoms of an illness or causing a child, young person or adult at risk to become unwell.

Signs of physical abuse (but not limited to):

- Bruises
- Broken or fracture bones
- Burns or scalds
- Biting
- Withdrawn
- Unusual behaviour, such as being irritable or not feeding properly²⁸.

Emotional abuse is any type of abuse that involves the continual emotional mistreatment of a child. It's sometimes called psychological abuse. Emotional abuse can involve deliberately trying to scare, humiliate, isolate or ignore a child. Emotional abuse is often a part of other kinds of abuse, which means it can be difficult to spot the signs or tell the difference, though it can also happen on its own.

Signs of emotional abuse (but not limited to):

- Humiliating or constantly criticising a child, young person or adult at risk.
- Threatening, shouting at a child, young person or adult at risk or calling them names.
- Making the child, young person or adult at risk the subject of jokes.
- Blaming and scapegoating
- Making a child, young person or adult at risk perform
- Not recognising a child, young person or adult at risk's own individuality or controlling.
- Pushing a child, young person or adult at risk too hard or not recognising their limitations.
- Exposing a child, young person or adult at risk to upsetting events or situations, like domestic abuse or drug taking
- Failing to promote a child, young person or adult at risk's social development
- Not allowing them to have friends
- Persistently ignoring them
- Being absent
- Manipulating a child, young person or adult at risk
- Never saying anything kind, expressing positive feelings or congratulating a child on successes.
- Never showing any emotions in interactions with a child, also known as emotional neglect²⁹.

Sexual abuse involves forcing, pressurising, tricking or enticing a child, young person or adult at risk to engage in any kind of sexual activity. This could be online or in person and not necessarily involve any of violence³⁰

²⁸ [Identifying Child Physical Abuse & How to Prevent It | NSPCC](#)

²⁹ [What Is Emotional Abuse & Things You Should Know | NSPCC](#)

³⁰ [Sexual abuse | Childline](#)

Signs of sexual abuse (but not limited to):

- sexually transmitted infections
- changes in emotional wellbeing
- going missing
- avoiding certain people or being alone with them
- displaying sexual behaviour inappropriate for their age
- self-harm
- eating disorders
- unwillingness to remove clothing when changing for sport
- unexplained gifts
- mental health issues

Neglect is the ongoing failure to meet a child's basic needs. Which can put a children, young people or adults at risk in danger or result in the serious impairment of their development. Broadly speaking there are 4 types of neglect including physical, educational, emotional and medical neglect³¹.

Signs of neglect (but not limited to):

- constant tiredness
- compulsive stealing
- running away
- accepting of excessive punishment
- feelings of worthlessness
- self-harm
- drug abuse
- poor trust in adults
- poor social relationships
- extremes of passivity or aggression
- excessive need for approval
- attention and affection
- mental health issues

Other Safeguarding Concerns/Types

Bullying is repeated, negative behaviour that is intended to make others feel upset, uncomfortable or unsafe.³² For further guidance on how to deal with bullying & cyberbullying refer to the Anti-Bullying Policy.

Child Criminal Exploitation is child abuse where children, young people and adults at risk are manipulated and coerced into committing crimes.³³

Child-On-child abuse also referred to as peer-on-peer abuse. It is when children or young people sexually, physically or emotionally abuse another young person. Children and young people may abuse others due to the perceived vulnerabilities or differences of the victim.³⁴

Child Sexual Exploitation is a type of child sexual abuse. It occurs when an individual or group

³¹ [Neglect is also Child Abuse: Know All About It | NSPCC](#)

³² [Anti-Bullying Pro](#)

³³ [Criminal exploitation and gangs | NSPCC](#)

³⁴ [Child-On-Child-Abuse: Signs and Indicators](#)

takes advantage of imbalance of power to coerce, manipulate or deceive a child or young person or adult at risk.³⁵

County Lines is a term used to describe gangs and organised criminal networks involved exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of “deal line”. They are likely to exploit children, young people and adults at risk to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.³⁶

Cyberbullying is the repeated, negative use of technology to intentionally hurt others e.g. posting unwanted pictures or messages, accessing another person’s account without permission, creating fake accounts to impersonate or harass someone, and sharing other people’s private information online.³⁷

Grooming is when someone builds a relationship, trust and emotional connection with a child or young person so they can manipulate, exploit and abuse them.³⁸

Fabricated or induced illness is a rare form of child abuse. It happens when a parent or carer exaggerates or deliberately causes symptoms of illness in the child.³⁹

Female genital mutilation (FGM) is a procedure where the female genitals are deliberately cut, injured or changed, but there is no medical reason for this to be done.⁴⁰ The Female Genital Mutilation Act (2003) is the UK legislation relating to this offence.

Forced Marriage is where one or both people do not or cannot consent to the marriage and pressure or abuse is used to force them into the marriage. It is also when anything is done to make someone marry before they turn 18, even if there is no pressure or abuse.⁴¹

Harmful Sexual Behaviour is sometimes referred to as Problematic sexual behaviour. It is developmentally inappropriate or socially unexpected sexualised behaviour which does not have an overt element of victimisation or abuse.⁴²

Hazing is any activity expected of someone joining or participating in a group that humiliates, degrades, abuses or endangers them regardless of person’s willingness to participate.⁴³

Poor practice is the same as low-level concerns. It is behaviours/concerns that falls short of abuse but is nevertheless unacceptable and required action for further guidance on how to respond, record and deal with poor practice refer to our Low-Level Concern Policy.

Radicalisation refers to the process through which a child, young person or adult at risk comes to support or be involved in extremist ideologies, it is a form of harm.⁴⁴ The Counterterrorism and Security Act (2015) places a duty on organisations to have due regard to prevent people from being drawn into terrorism (“the Prevent duty”). For further guidance refer to our Prevent Strategy.

³⁵ [Protecting children from sexual exploitation | NSPCC Learning](#)

³⁶ [County Lines - National Crime Agency](#)

³⁷ [Anti-Bullying Pro](#)

³⁸ [What Parents Need to Know About Sexual Grooming | NSPCC](#)

³⁹ [Overview - Fabricated or induced illness - NHS](#)

⁴⁰ [Female genital mutilation \(FGM\) - NHS](#)

⁴¹ [Forced marriage - GOV.UK](#)

⁴² [Harmful sexual behaviour \(HSB\) or peer-on-peer sexual abuse | NSPCC Learning](#)

⁴³ http://www.stophazing.org/wp-content/uploads/2014/06/hazing_in_view_web1.pdf

⁴⁴ [Radicalisation and child protection | NSPCC Learning](#)

Appendix 3: Internal and External Safeguarding Contacts

Name	Role	Email	Phone
Louise Gibson	Head of Safeguarding	Louise.gibson@nottinghamforest.co.uk	07729094817
Zofia Campbell	Academy Safeguarding Manager	Zofia.campbell@nottinghamforest.co.uk	07468698416
Reece Stevenson	Women's Sport & Event Safeguarding Lead	Reece.stevenson@nottinghamforest.co.uk	07468698409
Alex Bailey	Academy Player Care Lead	alex.bailey@nottinghamforest.co.uk	07796349039
Ant Thomas	Academy Safeguarding Officer	anthony.thomas@nottinghamforest.co.uk	07345080810
Beccie Davis-Yates	Women's Sport Safeguarding Officer	beccie.davis-yates@nottinghamforest.co.uk	07345998381
Sophie Morrow	Player Care & Wellbeing Officer	sophie.morrow@nottinghamforest.co.uk	07842445701

Other contact points:

Safeguarding Team Inbox: safeguarding@nottinghamforest.co.uk

Matchday Welfare & Safeguarding team inbox: besafe@nottinghamforest.co.uk

Text 80800 Forest (Matchdays).

Local Authority Contact Details

Nottinghamshire

The Multi-Agency Safeguarding Hub (MASH) is the single point of contact for all professionals to report safeguarding concerns:

You can contact the MASH team: 0300 500 8090; or professional consultation line 0115 977 4247

Online form: where you are concerned about a child [Report a new concern about a child](#) | [Nottinghamshire County Council](#)

Opening hours:

- Monday, Tuesday & Thursday 8.30am to 5pm.
- Wednesday 10:30am to 5pm.
- Friday - 8.30am - 4.30pm.

In an emergency outside of these hours, contact the Emergency Duty Team on 0300 456 4546.

Nottinghamshire adult safeguarding board provides support to adults at risk across Nottinghamshire.

Referral form for adults at risk: [Members of the public - report abuse or neglect](#) | [Nottinghamshire County Council](#)

If in an emergency, 0300 456 4546

Nottingham City

The City MASH is the single point of access for support and child and young person safeguarding services within Nottingham City.

All services are accessed [Multi Agency Safeguarding Children Hub \(MASH\) - Nottingham City Council](#)

Telephone: 0115 876 4800

Opening Hours:

- Monday to Friday 8:30am to 4:50pm Outside of these hours the telephone number is for emergency safeguarding enquiries only.

Nottinghamshire Safeguarding Children Partnership, County Hall, West Bridgford Nottingham, NG2 7QP.

The Nottingham City Safeguarding Adults Board (NCSAB) provides local safeguarding support and protection for adults at risk.

[About Nottingham City Safeguarding Adults Board - Nottingham City Council](#)

ncsafeguardingadultsboard@nottinghamcity.gov.uk

NCSAB Loxley House, Station Street, Nottingham NG2 3NG

Other Resources

The NSPCC general helpline provides parents, guardians, and carers with guidance and support: just call them on **0800 800 5000** and one of their counsellors will be there for you and ready to help.

NSPCC Whistleblowing Advice Line⁴⁵ 0800 028 0285 help@NSPCC.org.uk

⁴⁵ [Whistleblowing Advice Line | NSPCC](#)

Appendix 4: Safeguarding Team Key Responsibilities

Head of Safeguarding (HoS)

The Head of Safeguarding works across both Organisation and Trust to provide a clear sense of direction and purpose that assists both organisations to deliver their safeguarding strategies and implement policies and procedures that aim to promote and protect the welfare of children, young people, and adults at risk.

Their key responsibilities are:

- Lead the development and delivery of safeguarding strategies.
- Ensure compliance with all statutory obligations under relevant legislation, rules, regulations, standards, and guidance as laid down by the football authorities under which the organisation is bound (i.e., the Premier League and the FA).
- Proactively identify and mitigate safeguarding risks to individuals and to the organisation.
- Lead on the development, implementation and regular review of safeguarding policies, procedures and practices and ensure they meet statutory and football authority requirements and are aligned with best practice.
- Ensure all internal and external stakeholders receive regular, relevant education in line with their level of role, responsibility and engagement with children, young people and/or adults at risk.
- Provide regular direction, reports and updates to the Safeguarding Board and operational groups.
- Work with the People and Culture Team and Heads of Departments to develop and implement safer recruitment and induction practices.
- Work to embed a culture of strong safeguarding awareness, engagement and working practices.
- Provide support, guidance, and direction to staff in respect of all safeguarding incidents, concerns or allegations and ensure full evaluation of any lessons learnt.
- Ensure all Designated Safeguarding Officers are appropriately trained, supported, regularly supervised, and facilitate regular safeguarding meetings.
- Develop and maintain relationships with statutory and football authorities (such as the Police, Local Authorities, NSPCC the Premier League, the Football League, and the FA).
- Ensure continued professional development by regularly attending relevant training and keeping up to date with current safeguarding issues and risks as well as changes to legislation, statutory guidance, and best practice.

Trust Safeguarding Manager

Reporting to the Trust CCO, the Safeguarding Manager will be accountable for all day-to-day safeguarding functions of the Trust. The Safeguarding Manager will be responsible for the effective implementation of all policies and procedures that keep engaged children, young people, and adults at risk. The Safeguarding Manager will lead on all aspects of quality assurance and risk management, including the implementation of policies and procedures.

- Be the first point of contact for staff, volunteers, parents, children and adults at risk where concerns about welfare, poor practice or abuse are identified.
- Ensure all Trust safeguarding policies and procedures are up to date and operational.
- Implement effective processes and arrangements for managing and mitigating risks.

- Record and manage all incidents, concerns, allegations and evidence of poor practice
- ensuring, where necessary, external agencies are informed.
- Oversee the effective use of MyConcern and manage all Trust cases on the system.
- Lead on the Premier League Charitable Fund (PLCF) commissioned safeguarding audit.
- Be the key contact for the Trust's Board Safeguarding Lead and ensure they are kept informed of all relevant matters.
- Work closely with Nottingham Forest Football Club's Safeguarding Manager, keeping them informed of any serious concerns including those that may result in reputational damage and/or are referred to Charities Commission, Local Authority, Police, funding partners or other external organisations.
- Manage all DBS processes in a timely manner, acting as a verifier for staff and volunteers.
- Co-ordinate the delivery of relevant Safeguarding CPD and maintain the safeguarding training records for staff and volunteers.
- Provide day to day support for staff on safeguarding matters including monitoring and quality assurance of programme delivery.
- Support staff with safeguarding risk assessments and approve safeguarding arrangements for all activities and partners, including due diligence and actions plans for improvements.
- Lead on the writing and review of key quality assurance policies, including risk management and a critical incident planning.
- Operational responsibility of the Trust's risk register, reporting to the CEO and Board any emerging or significant risks and recommend operational improvements.
- Oversight of Trust data protection, sharing, storing, confidentiality and privacy.
- Develop and maintain the effective positive working relationships with appropriate partner organisations.
- Ensure that all Trust delivery programmes are fully compliant with the latest safeguarding, risk and health and safety legislation.

The Academy Safeguarding Manager (ASM)

The designated person will have primary responsibility for leading and implementing the club's safeguarding strategy and policy and for putting excellent monitoring and reporting procedures into daily practice to safeguard children and adults at risk across the academy.

Their key responsibilities are:

- Line Management of Academy Designated Safeguarding Officers (part time and casual).
- Ensuring appropriate safeguarding cover at the training ground during all Academy activity.
- Providing strategic influence and guidance on good safeguarding practise as part of the Academy Leadership Team.
- Working with all stakeholders to create a positive, child-centred academy environment.
- Lead on implementing and evolving the academy's approach to safeguarding children, young people and adults at risk.
- Be the lead point of contact within the Academy for reporting and managing of Safeguarding concerns about children and young people and guide and delegate colleagues to manage concerns where appropriate.
- Ensure all stakeholders are fully aware of reporting procedures through regular training and the dissemination of appropriate resources.

- Manage cases relating to safeguarding concerns about children and young people reported to and by the academy staff and stakeholders, undertake further investigations as/when required, and ensure all information is accurate, confidential, up to date, in line with GDP regulations and appropriately captured and monitored using our online system MyConcern.
- Support the Head of Safeguarding to manage concerns relating to Academy staff when appropriate.
- Liaise with parents/carers, schools, and local authorities when appropriate in relation to safeguarding concerns.
- Maintain oversight of children and young people with additional vulnerabilities and ensure their needs are assessed and reasonable support is in place for them at the Academy.
- Monitor and report on themes or trends in safeguarding matters at the Academy to the Academy Leadership Team, Head of Safeguarding and where appropriate the Senior Safeguarding Board.
- Help to ensure that the Premier League standards are met within in the Academy by promoting and championing all safeguarding policy and procedures and assisting in compiling evidence for audits.
- Develop policies, procedures and guidance documents to enhance safeguarding practises at the Academy. Facilitate and support the development and review of policies and procedures as appropriate.
- Design and deliver educational interventions for staff including training, presentations, and resource materials to raise awareness of safeguarding policies, procedures, and guidance.
- Design and regularly review the Academy safeguarding induction and ensure new starters receive relevant information and resources
- Support the Operations and Coaching departments with planning, preparing, and delivering trips and tours, including risk assessments and safeguarding provisions. Attend trips and tours on occasion to maintain oversight of risks, to assess safeguarding procedures, and to provide safeguarding support.
- Assist the Academy in keeping staff's safeguarding training up to date, including the FA Safeguarding Children certificates and first aid for coaches.
- Support the Club's safer recruitment process by ensuring new and existing staff undertake the relevant DBS checks in a timely manner.
- Attend training and fixtures for all age groups in the Academy to observe and feedback where applicable on best practice. Including and not limited to all training and fixture venues both home and away.
- Provide advice and support to all staff, volunteers and associates of the organisation in relation to safeguarding concerns and queries.
- Responsible for identifying staff training and development needs by evaluating strengths and weaknesses, Once identified, responsible for planning, organising and overseeing appropriate training on an annual basis.
- Attend and contribute to Academy SWEP Group meetings as deemed appropriate.
- Represent the Academy at Club safeguarding meetings and feedback where appropriate.
- Maintain player information confidentiality and professional distance from all playing staff acting within professional codes of conduct and scope of practice at all times.

Women's Sport & Event Safeguarding Lead

To lead on the development and implementation of the Club's safeguarding strategy, policy and procedures for Women Sport across NFFC. In addition, being the safeguarding event manager across the club, being primarily responsible for NFFC Matchday safeguarding requirements.

Their key responsibilities are:

- Working with all stakeholders to ensure a positive environment appropriate for both Women and Girls football & NFFC Netball Pathway.
- Play a lead role in developing and establishing the Women Sport approach to safeguarding as the Club goes through a period of transformation.
- Be the first point of contact for reporting and managing concerns within Women's Sports department (Women & Girls Football & Netball) and ensure all stakeholders are fully aware of policies and processes through the dissemination of appropriate resources.
- Managing cases using our online reporting application, MyConcern, ensuring accurate, confidential and up-to-date documentation in line with GDPR regulations, escalating cases to the Head of Safeguarding or Senior Safeguarding Lead where appropriate.
- Play an active role in ensuring the Club's policies and procedures are continually reviewed to ensure compliancy and we continue to lead in the women's sport arena.
- Provide advice and support to all staff, volunteers and associates of the organisation in relation to safeguarding concerns and queries.
- Work with the Head of Safeguarding, General Manager for Women and Girls and Head of Netball Operations to highlight any safeguarding or welfare trends and provide mitigation, support and advice in relation to these trends.
- Lead on the development, implementation and delivery of a personal development and/or life skills programme in line with players' needs.
- Provide high-quality safeguarding and wellbeing support by working closely with the Women's and Girls staff (Football and Netball) to ensure there is a holistic approach that puts safeguarding at the heart of everything we do.
- Provide 1:1 support that is tailored towards individual needs of players and signposts them to internal and external support where appropriate.
- Develop the processes for supporting players at key transition points at the Club, in particular induction, exit, progression through age groups, and trialists.
- Complete and lead of risk assessments in relation to events, programmes, tournaments or trips from a safeguarding perspective.
- Attend where appropriate tours and trips, leading on all safeguarding & welfare pre, during and post trips.
- Support and deliver parent and player voice initiatives and develop a parent education programme to help support across Women's sport at NFFC in accordance with the NFFC Forest Engagement Framework.
- Be the principal point of contact for relevant governing bodies for all matters relating to areas within safeguarding.
- Attendance at training and fixtures for all age groups in accordance with our safeguarding quality assurance framework.
- Deliver staff training when required in accordance with our safeguarding workforce development plan.
- Represent the NFFC Women Sport at meetings and feedback where appropriate.

Designated Safeguarding Officers (DSOs)

DSOs support the Organisation's Head of Safeguarding to proactively promote and raise

safeguarding awareness and assist with responding appropriately to safeguarding concerns and allegations.

DSOs are based in operational positions across the Organisation, Trust, Academy, Women and Girl's football and Netball programmes. The DSOs ensure that suitable operations and practices are in place to ensure that staff are appropriate and adequately trained in safeguarding.

Their key responsibilities are:

- Supporting the Head of Safeguarding and the relevant Heads of Departments to promote the welfare of children and young people and adults at risk.
- Implementing reporting and recording procedures and where applicable be the first point of contact within the Safeguarding Team.
- Report safeguarding concerns or poor practice to the Head of Safeguarding.
- To maintain a high profile as the recognised point of contact, freely available to all individuals wishing to raise concerns or seek help and guidance on any questions connected with the Safeguarding Policy and Procedures.
- To attend safeguarding meetings within the safeguarding structure.
- Communication with outside agencies through the direction of the Head of Safeguarding.
- Attend meetings with linked external agencies including LADO etc. through the direction of the Head of Safeguarding.
- Promote safe working practice guidance, Code of Conduct and assist with risk assessments of activities.
- Assist the Head of Safeguarding in keeping staff's safeguarding training up to date, including the FA Safeguarding Children Certificates and the medical department and PL requirements. Identify areas for development / training needs.
- Delivery of some staff training (where identified & required).
- To communicate clearly with all staff, volunteers, parents/carers, and vulnerable groups on matters related to safeguarding, providing advice and support when necessary.
- Carry out monitoring visits to relevant sites/activities.

Appendix 5: Guidance to staff when dealing with a disclosure

We are committed to providing a safe and inclusive environment where a child, young person or adult at risk can feel comfortable disclosing any worries or concerns they may have. We are child-focused in all that we do, and we will ensure that the child feels supported and believed (see appendix 7 for the 4's model).

The following guidelines offer help and support in responding to abuse or a suspicion of abuse:

You should:

- Listen carefully.
- Stay calm and do not offer your personal opinions or thoughts.
- Do not overly question the child, young person or adult at risk. Obtain sufficient information to be able to understand the disclosure and immediate risk.
- Write down all the clarification questions you were required to ask as soon as possible, documenting them verbatim.
- Tell the child, young person or vulnerable adult that you are listening and taking what they say extremely seriously.
- Seek medical attention if necessary.
- Take appropriate action to keep the child, young person or adult at risk safe- you may be the only person in a position to do this.
- Inform the Head of Safeguarding or a member of the safeguarding team immediately or as soon as practicable.
- Write down everything said (in their words as far as possible) and what was done- accuracy and details are important.
- Any injuries seen should be noted and recorded.
- Keep this information stored in a secure place.
- Be aware that medical or criminal evidence may be relevant.

You should not:

- Offer to keep any information disclosed confidential. Explain that you may need to share this information to the police, social care or another adult in order to keep them safe.
- Make promises they cannot keep.
- Interrogate the child – it is not your job to carry out an investigation.
- Cast doubt on what the child has told you
- Never interrupt or change the subject.
- Say anything that makes the child feel responsible for the abuse.

Further guidance and support can be located: <https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/what-to-do-child-reveals-abuse/>

Appendix 6: Rules, Regulations and Guidance

The Organisation is governed by the legislation and rules/regulations set out by several key governing agencies including the Government, Football Association (noting its safeguarding plan: *Keeping people involved in football safe: 2021-2024*), English Football League, and the NSPCC Child Protection in Sport Unit, and the Premier League:

- The Premier League Safeguarding Standards 2024/25.

Relevant national guidance:

The content of this policy is underpinned by the following legislative documents and policies:

- The Children Act 1989 – HM Government
- Every Child Matters 2003 – HM Government
- Safeguarding Vulnerable Groups Act 2006 – HM Government
- Working Together to Safeguard Children 2023 – HM Government
- Keeping Children Safe in Education 2025 – HM Government
- Protection of Freedoms Act 2012 – HM Government
- What to do if you are worried about a child being abused 2015 – HM Government
- Human Rights Act 1998 – HM Government
- Standards for Safeguarding and Protecting Children in Sport 2005 - NSPCC CPSU
- Safeguarding Children and Young People. Guide to Member Organisations and Community Trusts 2017 – EFL
- Nottinghamshire Area Child Protection Procedures – Nottinghamshire County Council
- The Sexual Offences Act 2003 – HM Government
- Education Act 2002 – HM Government
- Counter Terrorism and Security Act 2015 – HM Government
- Preventing and Tackling Bullying 2017 – HM Government
- Prevent Duty Guidance 2023 – HM Government

Links with other Policies and Guidelines:

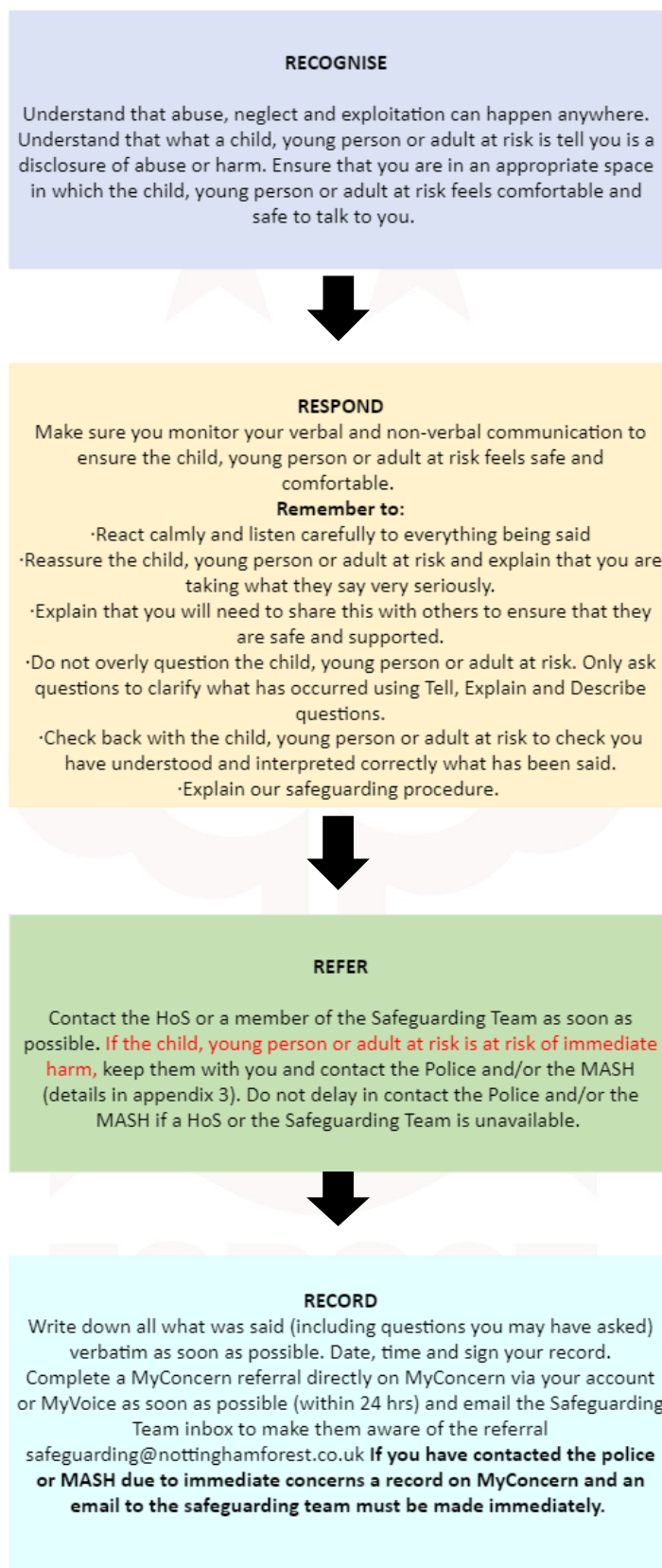
- Anti-bullying Policy
- Behaviour Policy and Framework
- Care and Accommodation Policy
- Complaints Policy
- Codes of Conduct (Players/Parents/Spectators/Staff)
- Code of Conduct for Scouts Policy
- Disciplinary Policy
- Due Diligence Policy & Framework
- eSafety Policy
- Evaluation and Management of DBS Content Policy
- Event Risk Assessment Guidance
- IT Policy
- Low-level Concerns Policy
- Managing Allegations Against Staff and Volunteers Policy
- Management of Safeguarding Data Policy
- MyConcern Guidance and Procedure Policy
- Prevent Strategy

- Risk Management Policy
- Recruitment Policy
- Safer Event Management (Trips and Tours) Guidance
- Safeguarding Players Under 18 Playing in Older Age Groups Policy
- Safeguarding Recording Standards Policy
- SCR Management Policy
- Social Media Policy
- Transport Policy
- Whistleblowing Policy
- Workforce Development Plan

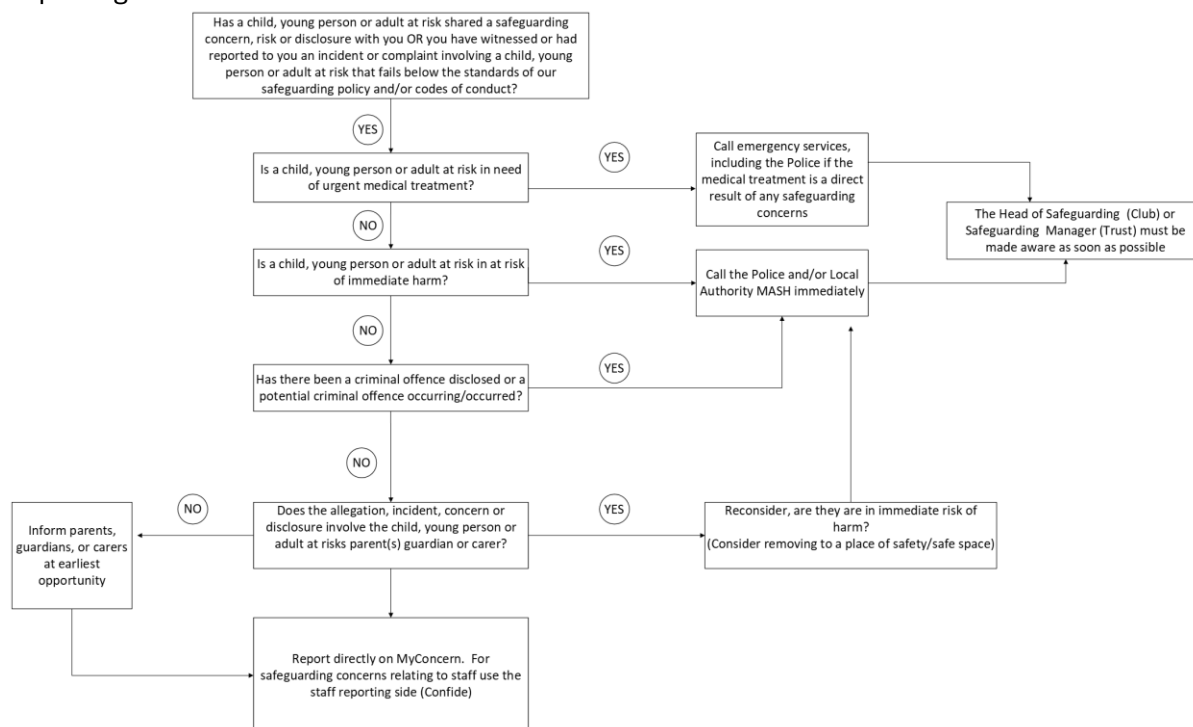


Appendix 7: Reporting and Responding Guidance

When dealing with a disclosure from a child, young person or adult at risk follow the 4R's:



Reporting Process Flowchart:



Appendix 8: Dealing with child-on-child abuse

There are different ways that a child or young person may be abusive towards others, and they might not realise they are doing so:

- bullying or cyberbullying
- emotional abuse
- online abuse
- physical abuse
- sexting
- sexual abuse.

When a child abuses another child, it is sometimes called 'peer-on-peer' or 'child-on-child' abuse. Peer-on-peer abuse refers to abuse that takes place between children of a similar age,

whereas child-on-child refers to abuse between children of any age. Sometimes children might also display abusive behaviour towards adults.

IDENTIFYING CONCERNS

There are a range of ways concerns might be raised.

- A child or adult might make a direct allegation of abuse by a child or young person.
- A child or adult might tell you they're uncomfortable with a child or young person's behaviour. They may not realise the behaviour is abusive.
- A member of staff or volunteer might observe behaviour that gives cause for concern and make a report following this procedure.
- A child or young person might tell you they have harmed someone else or are at risk of doing so.

If you have the above concerns, a report via MyConcern should be made as soon as possible (following the process diagram in appendix 7).

RESPONDING TO INCIDENTS

Sometimes you might see a child or young person behaving inappropriately and decide to talk to them about this immediately, in order to manage the behaviour. Remember that they may not realise their behaviour is unacceptable. Talk to them calmly and explain why their behaviour is unsuitable and what they can do to improve it. If you have been required to do this it is important you keep accurate and detailed notes and make a MyConcern referral as soon as possible.

Notes should include:

- the child's details (name, age)
- the date and time of the incident
- what was happening before the incident took place
- what the child said or did that gave you cause for concern (write down their exact words if possible)
- whether the behaviour appeared spontaneous or premeditated

The HoS will review the concern to establish if this is a child protection concern. An allegation becomes a child protection concern when:

- the behaviour involves sexual assault or physical assault
- the child who has experienced the abusive behaviour has suffered significant harm
- the behaviour forms part of a pattern of concerning behaviour by the child or young person who is being abusive
- the child carrying out the abuse is displaying sexualised behaviour
- the child carrying out the abuse may be doing so because they have experienced abuse themselves.

It is also a child protection concern when there's a significant difference of power between the child who is displaying abusive behaviour and the person being abused, for example when:

- there's an age difference of more than two years
- there's a significant difference in terms of size or level of ability
- the child displaying abusive behaviour holds a position of power (such as being a helper, volunteer or informal leader)

- the child being abused is significantly more vulnerable than the other child or young person⁴⁶.

If the HoS reasonable believes that this concern is a child protection concern, a statutory referral must be made to the local agency MASH (see appendix 3 for contact details) as soon as practicable in accordance with the MyConcern Guide and Policy.



⁴⁶ [Managing allegations of abuse made against a child | NSPCC Learning](#)