



Crawley Town Community Foundation

Safeguarding Children & Young People

March 2025

CONTENTS

Definition of Terms	4
1 Policy Aims and Objectives	5
1.1	5
1.2	5
2 Scope of Policy.....	6
2.1	6
2.2	6
2.3	6
3 Legal, Statutory and Regulatory requirements.....	6
3.1	6
4 Introduction / Background	7
4.1	7
5 Safeguarding Children and Young people	8
5.1 Recognising a Safeguarding Concern	8
5.2	8
5.3 Reporting a Safeguarding Concern	9
5.4 Recording a Safeguarding Concern	9
5.5 Making a Referral.....	9
5.6 Responding to a Safeguarding Concern and Partner Organisations	10
5.7	11
5.8 Dos and Don'ts of responding to a concern.....	12
5.9	13
5.10 Support Assessments and Reasonable Adjustments.....	13
6 Safer Recruitment & Maintaining a Safe Culture	13
6.1 Safer Recruitment Process at Crawley Town Community Foundation	13
6.2 Maintaining a Safe Culture.....	14
6.3	15
6.3	16
6.4	17
6.5	17
6.6	18
6.7	18
6.8	19
6.9	20
6.10 Position of Trust and Relationships of Trust.....	20
6.12 Safeguarding Codes of Conduct.....	21
7 Confidentiality	22
7.1	22
7.2	23
7.3	23
7.4	24

7.5	24	
8	Key Responsibilities	24
8.1	25	
8.2	25	
8.4	29	
8.5	30	
8.6	30	
8.7	31	
9	Performance Management and Reporting	31
9.1	32	
10	Risks associated with Policy	31
11	Privacy Implications	32
12	Equality, Diversity and Inclusion	32
13	Policy review and improvement	32
14	Associated procedures, templates or pro formas etc.	33
15	Safeguarding Procedures	33
15.2	DSL Managing a Safeguarding Concern	35
16	Appendices	36
16.1	Appendix 1 Useful Contacts	36
16.2	Appendix 2 Definitions, Categories, Signs and Indicators of Potential Abuse – Children and Young People	37
17.4	Support available for survivors of historical abuse in Football	47

Definition of Terms

Child/Children/Young People/Young Person	Refers to any children/child under 18 years of age. Terms are used interchangeably within policy.
Parent/Guardian	Refers to parents, carers or guardians of a young person.
Senior Safeguarding Manager (SSM)	Head of Foundation, accountable for safeguarding within Crawley Town Community Foundation.
Designated Safeguarding Lead (DSL)	The appropriate and named individual responsible for overseeing proper adherence to safeguarding policies and procedures and responsible for the management of concerns in line with local and national procedures – at Crawley Town Community Foundation, this is the Head of Foundation.
Designated Safeguarding Officer (DSO)	Overseen by the DSL, the DSOs are the Foundations Senior Leadership Team, who have departmental management responsibilities. They support the DSL to ensure that safeguarding is at the forefront of departmental activities.
Partner Organisation	Any other organisation who has been sub-contracted by or works alongside Crawley Town Community Foundation to deliver its portfolio of activities.
DBS	Disclosure and Barring Service.
Individual Support Plan (ISP)	A person-centred support plan, including personal risk assessments written in cohesion with a young person, their parent/guardian and other care professionals following a robust assessment of support needs.
Local Authority	Police Constabularies, Local Safeguarding Children’s Partnerships and other authorities based in the young person’s area of residence and/or where Foundation/partner organisation operates.
LSCP	Local Safeguarding Children Partnerships (formally Local Safeguarding Children Boards).
LADO	Local Authority Designated Officer.
GDPR	General Data Protection Regulation underpinning the Data Protect Policy of the organisation.

Contextual Safeguarding	An approach to safeguarding that responds to children & young people’s experiences of harm outside of the home, for example, with other children, in schools and in neighbourhoods.
Programmes, activities & events	Any programme delivered by Crawley Town Community Foundation or other partner organisations to children and young people as part of the Foundations portfolio of programmes.
The FA	The Football Association.

1 Policy Aims and Objectives

1.1 Policy Statement

Crawley Town Community Foundation believes children and young people have the right to live a life free from abuse and neglect and that everybody has a role to play in their protection. We place safeguarding at the heart of all our activities and those carried out by other partners.

Crawley Town Community Foundation recognises its responsibility to actively promote the welfare of all participants accessing programmes and support our network of partners in implementing robust safeguarding policies & procedures and continually reviewing and improving their ways of working to ensure the best possible outcomes for individuals in their reach.

We understand the safeguarding of children and young people is not limited to the delivery of safe programmes and our duty to recognise and respond accordingly to welfare issues unrelated to Crawley Town Community Foundation activities, and endeavour to work with Local Authorities to prevent harm to children and young people.

Crawley Town Community Foundation are committed to the ongoing support of the survivors of non-recent abuse in football and promote the work undertaken by affiliated football authorities

1.2 Purpose of Policy

This policy serves to ensure that all children and young people accessing a programme or activity hosted by Crawley Town Community Foundation or throughout our network of partner organisations can do so safely and with the appropriate levels of support. Overall, this policy aims to:

- Clearly demonstrate Crawley Town Community Foundations commitment to safeguarding children and young people
- Outline the measures Crawley Town Community Foundation will take to prevent safeguarding incident occurring because of their practices
- Outline the measures Crawley Town Community Foundation will take in response to a safeguarding concern or incident to ensure that the child or young person is supported appropriately, and the best possible outcome achieved
- Outline the measures Crawley Town Community Foundation will take to ensure appropriate learning is taken from any safeguarding incidents which occurs to make future improvements

- Clearly outline Crawley Town Community Foundation staff and volunteers’ responsibilities in relation to safeguarding
- Identify key safeguarding contacts and clearly outline their responsibilities
- Clearly outline the escalation process in the event of a safeguarding incident or concern
- Ensure that the child or young person is placed at the centre of a safeguarding incident or concern and that they are fully involved in any decisions made regarding their wellbeing or support
- Ensure that all Crawley Town Community Foundation staff and volunteers are confident in the actions to take in the event of a safeguarding incident or concern and understand what support is available to them at Crawley Town Community Foundation

2 Scope of Policy

2.1 Crawley Town Community Foundation Staff and Volunteers

This policy is for the use of all employees and volunteers of Crawley Town Community Foundation operating at all levels of responsibility throughout the organisation. All staff and volunteers have access to this policy and receive on-going training on their safeguarding responsibilities in relation to their job role.

2.2 Crawley Town Community Foundation & Partner Organisations

Crawley Town Community Foundation circulates this policy throughout their network and expects that each partner organisation underpins its key principles within their own local safeguarding arrangements.

2.3 Key Safeguarding Contacts

Darren Ford	Designated Safeguarding Lead	01293 410000 darrenford@crawleytownfc.com
-------------	------------------------------	--

3 Legal, Statutory and Regulatory requirements

This policy is underpinned by current government legislation and guidance. Crawley Town Community Foundation will regularly review and amend this policy to reflect any changes to legislation and guidance at a minimum of once yearly and more often as required.

3.1 Key Legislation

This Policy is underpinned by key legislation & guidance from government departments such as the Department for Education (DfE) and the Department of Health and Social Care, as well as the guidance and procedures of Local Safeguarding Children Partnerships (LSCPs):

- Working Together to Safeguard Children (2018) – Amended Feb 2024
- The Children Act (1989 and 2004)
- What to do if you're worried a child is being abused: Advice for Practitioners (2015)
- Safeguarding Vulnerable Groups Act (2006)
- DBS Code of Practice
- Protection of Freedoms Act (POFA) (2012)
- Keeping Children Safe in Education (KCSIE) – Amended Sept 2023
- After-school clubs, community activities and tuition: safeguarding guidance for providers (2023)
- Female Genital Mutilation Act (2013)
- Sexual Offences Act (2003)
- UN Convention on the Rights of The Child (1989)
- The Care Act (2014)
- The Equality Act (2010)
- General Data Protection Regulations (2018)
- Special Educational Needs and Disabilities Code of Practice: 0 to 25 years

4 Introduction / Background

To ensure the safeguarding of children and young people is prioritised by Crawley Town Community Foundation and our partner organisations, it is vital that there are well considered arrangements in place underpinned by government legislation, guidance & key principles of safeguarding as well as specific regulations operated throughout the FA.

A contextual approach must be adopted throughout the network, recognising that children and young people may be vulnerable to abuse, harm and exploitation from their relationships and interactions within the wider community and that safeguarding responsibilities are not limited solely to when a concern arises on one of Crawley Town Community Foundations programmes or activities.

Partner organisations must be committed to understanding the key issues faced by children and young people and tailoring safeguarding arrangements to prevent, recognise, and manage these appropriately.

4.1 Background

Safeguarding is everyone's responsibility & Child Safeguarding Principles

“Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- *providing help and support to meet the needs of children as soon as problems emerge*
- *protecting children from maltreatment, whether that is within or outside the home, including online*
- *preventing impairment of children's mental and physical health or development*
- *ensuring that children grow up in circumstances consistent with the provision of safe and effective care*
- *promoting the upbringing of children with their birth parents, or otherwise their*

family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children

- *taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework*

Working Together to Safeguard Children, Department for Education, updated December 2023

The Foundation engages with thousands of young people each year, utilising the power of the Crawley Town badge, which is widely trusted by children and young people and their families. Crawley Town Community Foundation recognise the vital role they play in supporting children and young people accessing programmes throughout the network and the importance of embedding principles and procedures to prevent the harm, abuse or exploitation of children and young people both on and off our programmes and activities.

5 Safeguarding Children and Young people

A child is defined as a person who has not yet reached their 18th Birthday. In this policy, the terms children and young people are used interchangeably.

5.1 Recognising a Safeguarding Concern

Abuse can be defined as the violation of a child's human rights, perpetrated by any other person or persons. This can range from treating someone in a way which significantly affects their emotional wellbeing, to causing physical harm. Abuse includes, but is not limited to Physical, Sexual and emotional harm.

Neglect can be defined as the persistent failure to meet a person's basic physical and/or psychological needs, likely to result in the serious impairment of a person's health or development.

Contextual safeguarding can be defined as an approach to understanding and responding to children's experiences of significant harm beyond their family and home that recognises the different relationships children have in their schools, peer groups, online and in their community. Parents and carers may have little influence over these contexts.

Staff and volunteers are trained to **recognise the indicators** that a child may be experiencing or at risk of abuse or neglect. EFL in the Community recognise the contextual safeguarding risks related to children and young people. As such, this is incorporated into all training for staff, volunteers and CCOs/partner organisations working within the network to ensure that staff and volunteers are confident in responding appropriately if they have any concern.

Comprehensive Definitions, Signs and Indicators of Potential Abuse with regards to children and young people are located within Appendix 2 of this policy.

5.2 Responding to a Safeguarding Concern

If a staff member or volunteer has a concern about a child or young person, or where a disclosure has been made, they will:

- Take appropriate and immediate action if the individual requires urgent medical attention or protection, including notifying the emergency services.
- Wherever possible, seek consent from the Individual to act and to report the concern. If it is decided to act against their wishes or without their consent, a record of the decision and the reasons for this must be made.
- Where it has been decided to act against the wishes of the individual, be transparent and ensure they understand that the concern will need to be shared with others.
- Where appropriate, signpost the individual to relevant support services.

5.3 Reporting a Safeguarding Concern

After responding appropriately to the concern, the staff member/volunteer will:

- Notify the DSL as soon as possible, and no later than the end of the working day.
- Where the DSL is unavailable, the staff member/volunteer will notify their line manager, who has been trained to Level 3, who will support until the DSL is available.

5.4 Recording a Safeguarding Concern

It is the responsibility of the staff member/volunteer to ensure that the relevant records are made, although, the DSL will oversee that this has happened in line with the correct procedures:

- Complete the appropriate reporting form on My Concern to ensure a record of the concern is maintained. Written evidence should be factual. Opinions can be included if it clearly documented that it is an opinion
- Ensure all records are kept securely and confidentially, in line with GDPR and internal data protection procedures

5.5 Making a Referral

The DSL will consider the appropriate action to take, taking the following into account:

- The individual's wishes and preferred outcome
- Whether there is a person in a position of trust involved
- Whether a crime *appears to have been* committed
- Whether the concern meets the threshold for the intervention of Local Authorities

The DSL will use their expertise and experience to decide upon the relevant action to take to achieve the best possible outcome for the young person. Actions decided upon can range from signposting the individual to appropriate support services in the case of more minor events to making a referral to their LSCP in the case of more significant concerns.

5.6 Responding to a Safeguarding Concern and Partner Organisations

When managing a concern, DSLs & DSOs at Crawley Town Community Foundation must follow their own internal policies and procedures, ensuring that they and their staff teams Respond, Report, Record & Refer appropriately.

Where staff or partner organisations require additional support, guidance, or advice to ensure a concern is managed appropriately, the Crawley Town Community Foundation Designated Safeguarding Lead is on hand to support.

Where a Crawley Town Community Foundation staff member or volunteer has a concern around a child or young person, or the conduct of the Foundations or partner organisation's staff or volunteers, they will notify the organisation's DSO and the DSL immediately. Where a child or young person has been harmed, they will first contact the relevant emergency services.

Clear escalation processes are outlined in ***Section 15 – Safeguarding Procedures***.

It is imperative that Crawley Town Community Foundation and partner organisations understand the contractual requirements in relation to the recording and reporting of safeguarding incidents for each individual contract and comply with these requirements fully. Requirements are set out in contracts and/or Service Level Agreements (SLAs) and should be clearly established during the development of the programme to ensure a robust process is in place for programme delivery.

5.7 Guidance for staff & volunteers

Context of incident	Guideline actions for Programme Lead
Low Risk	
Non-recent (historical), already referred	Provide support to individual and signpost to external support services as required. Report to DSL and make a record of incident/concern on the relevant case management system (Salesforce/My Concern etc.)
Medium Risk	
<p>Non-recent (historical), not referred yet and individual not believed to be at immediate risk of harm</p> <p>Incident on programme, Child on Child incident</p>	<p>Provide support to individuals and notify DSL. Where appropriate, support individuals to make a plan to keep themselves safe or signpost to external support services as required. Manage Individuals involved in accordance with Code of Conduct. Make a record of incident/concern on the relevant case management system. Programme managers/DSL to support staff as necessary including holding debrief/support session</p>
High Risk	
Non-recent (historical) where Individual is in immediate risk of harm	Where necessary, ensure the safety of the individual, seeking support of the emergency services as required
Incident on programme, Child on Child - serious allegation or sexual assault	Trigger Critical Incident Procedures immediately Notify DSL and programme manager immediately

Incident on Programme, Adult/staff on Individual	Follow any directions given to you and maintain a record of incident/concern Programme managers/DSL to support staff as necessary including holding debrief/support session
--	---

When escalating a safeguarding concern or disclosure, staff and volunteers will be asked for the following:

- **Facts** – A factual account of what has happened without opinion/hearsay. What has been witnessed or what exactly has been said
- **Actions** – Details of steps the staff team have already taken to support the young person
- **Cooperation** – Follow direction and guidance of the DSL
- **Records** – A detailed incident log on the relevant case management system (Salesforce, My Concern etc.)

The DSL will ask for ongoing updates of the situation so an appropriate response can be made to any developing concerns.

When handling a concern or disclosure, the DSL will keep accurate records of all subsequent actions taken, as well as monitor the feedback from statutory agencies on any action taken by themselves. In the event of an unsatisfactory response or action from statutory agencies the team will formally escalate their concerns within the local authority and inform the SMM.

5.8 Dos and Don'ts of responding to a concern

Do

- React calmly and make time for the individual
- Reassure them they have done the right thing in telling you and that they are not to blame
- Find an early opportunity to explain you will need to talk to others and explain why
- Take them seriously
- Where the individual has a communication impairment or there is a language barrier, be patient and consider how best to help them to express themselves
- Allow the individual to relay their own account of events without interruption in order to build a clear understanding
- Sensitively clarify information using “open” questioning techniques i.e. “tell me”
- Make a full record of what had been said, heard and/or seen as soon as possible. Ensure this includes the time and date, as well as the name of the person completing the record

Don't

- Panic or show any personal feelings or reactions to the information being shared
- Probe or investigate. It is only appropriate to clarify with what they are telling you after they have given their own account (what, when, who etc.)
- Ask leading questions or put words into the individual's mouth, speculate or make assumptions

5.9 Support Assessments & Reasonable Adjustments

As part of Crawley Town Community Foundations ongoing commitment to safeguarding and delivery of safe programmes, the importance of assessing participant needs is promoted through governance, training and support.

5.10 Support Assessments and Reasonable Adjustments

It is vital that young people with additional support needs accessing any programme, activity or event held within the network undergo a person-centred assessment of needs for any required adjustments to activities, the environment or staffing to be identified and actioned. It is important the Foundation and partner organisations have a robust process in place around assessing support needs, writing Individual Support Plans (ICPs), undertaking personal risk assessments, and providing tailored support from a team of trained and competent staff and volunteers. The EFL in the Community can provide guidance around this and ensure key staff have access to training and workshops as part of a wider training strategy, however, responsibility remains with the Foundation and partner organisations.

6 Safer Recruitment & Maintaining a Safe Culture

Crawley Town Community Foundation is committed to the fair treatment of both existing and potential staff and volunteers or users of its services and with protected characteristics as defined within the Equality Act 2010.

6.1 Safer Recruitment Process at Crawley Town Community Foundation

Crawley Town Community Foundation recognises that to fulfil safeguarding duties it must first be acknowledged that potential abusers may try to seek employment or volunteer in activities with children and young people and vulnerable groups, including those activities which are delivered by or on behalf of Crawley Town Community Foundation.

Activities carried out by Crawley Town Community Foundation and its Partners, must be done so by staff and volunteers who have been subject to a robust “Safer Recruitment” and vetting process. A DBS check alone must never be considered as sufficient evidence that a staff member or volunteer is suitable to work with vulnerable groups. Safer Recruitment measures include:

- Job adverts & people specifications clearly outline the organisation’s commitment to safeguarding, the safeguarding requirements of the role and the requirement of the appropriate Disclosure & Barring Service check
- All applicants complete an application form and CVs are not accepted in place of a complete application form
- All applicants are interviewed by a minimum of two appropriate staff, at least one of which has undertaken safer recruitment training
- Interview questions are consistent, relevant to the role and include value-based questions
- A minimum of two references are sought. Where applicable, one reference is requested from the most recent employer. Where an applicant has worked with children or vulnerable groups in the past, one is requested from this placement
- Where an applicant has not previously held employment, references are requested from education providers, volunteer placements and from character references
- Applicants shortlisted for a position are given a chance to self-declare any relevant criminal or disciplinary action taken against them, including barring and prohibition orders
- The appropriate DBS check is undertaken using the FA First Advantage System
- Where the applicant already holds the appropriate DBS check and this is registered with the Update Service, this is reviewed by Crawley Town Community Foundation
- Appropriate identification is supplied by applicant along with any required evidence of their right to work in the UK
- Evidence of relevant qualifications and professional body memberships is obtained
- Relevant qualifications and professional memberships are evidenced by the applicant
- Unconditional offers of employment are not made until all checks have been completed and are satisfactory.

Other partner organisations who Crawley Town Community Foundation subcontract to, do not utilise The FA First Advantage system to obtain DBS checks on staff and volunteers. These organisations must still adhere to a process of obtaining DBS checks for all staff and volunteers working with vulnerable groups and operate a safer recruitment policy which adheres to the principles of safer recruitment as outlined above. This is reviewed by Crawley Town Community Foundation through Due Diligence Processes.

6.2 Maintaining a Safe Culture

The impact of an organisation’s culture on the good practice and conduct of staff and volunteers cannot be overlooked. Safer Recruitment and DBS checks alone will not ensure that activities are well supervised and supported. Crawley Town Community Foundation and partners’ Leadership Teams and Trustees must take the lead on establishing and maintaining the values and culture of the organisation, ensuring all staff and volunteers understand and uphold their responsibilities in relation to the quality and safety of activities and be effectively supervised to ensure they have the continued support required to do so. Safer Culture measures include, but are not limited to:

- A “from the top down” approach in prioritising safeguarding
- Clear organisational values and expected behaviours
- A listening culture where the voice of activity participants is regularly captured and acted upon
- Regular and consistent channels for staff and participants to openly discuss working practices
- Visibility of management and leadership teams

- A thorough induction process for all staff and volunteers, regardless of their position or contract type. This includes a safeguarding and health & safety induction
- Training specific to the role
- Easily accessible and understandable policies & procedures
- Access to key contacts in the organisation such as the safeguarding and health & safety leads
- Mentoring from an experienced staff member
- Briefings to ensure staff and volunteers have access to all the information and resources they need to run safe and quality activities
- Regular support or 1:1 sessions with a line manager including discussions around safeguarding practices
- Team meetings with safeguarding as a fixed agenda item
- Debrief sessions
- Multi-agency working
- Lessons learned from poor practice or safeguarding concerns

6.3 Allegations of abuse or poor practice against Crawley Town Community Foundation Staff and Volunteers

Allegations of abuse and concerns or complaints about practice raised against a member of Crawley Town Community Foundation staff or a volunteer will always be taken seriously and managed in accordance with the local policies of the relevant authorities involved, including where a non-recent, historical allegation is raised.

Crawley Town Community Foundation expects all staff and volunteers to share a commitment to safeguarding children and young people and vulnerable groups, in accordance with this policy during their employment or volunteer activities.

In addition to this policy, Crawley Town Community Foundation outlines staff and volunteers duties, behaviours and responsibilities in respect of safeguarding within:

- Crawley Town Community Foundation Employee Handbook
- Safer recruitment messages including Job Descriptions and Person Specifications
- Safeguarding Code of Conduct (***See section 14***)
- Event specific Codes of Conduct

Crawley Town Community Foundation policies, procedures and best practice guidance, including those established by our CCOs and partner organisation, identify how staff and volunteers should be mindful that they hold a position and/or relationship of trust and one of a role model, and as such have a responsibility to keep themselves safe.

Complaints or concerns will be dealt with as an allegation by the Crawley Town Community Foundation where it is suggested that a member of staff or volunteer may have:

- Behaved in a way that has harmed, or may have harmed a young person or other vulnerable groups
- Committed a criminal offence against or related to a young person or other vulnerable group

- Behaved towards a young person or other vulnerable group in a way that indicates they would pose a risk of harm in respect of their work with these groups

Such allegations will be referred to the LADO at the relevant LSCP within one working day, and where there may have been a criminal offence committed, to the police within one working day.

Concerns raised about significant poor practice can sometimes be difficult to determine against thresholds for referral to statutory agencies such as the LSCP. An example of this may include breaches of the Crawley Town Community Foundation Safeguarding Code of Conduct for Staff and Volunteers (***see section 14***). In such situations the Crawley Town Community Foundation Designated Safeguarding Lead will use their professional judgement and seek advice where appropriate from the relevant LSCP or FA Safeguarding Case Management Team, before deciding whether to make a formal referral, or whether to treat the concern as serious poor practice or a “Low Level Concern” and deal with the matter in line with the allegations procedure and any subsequent disciplinary process.

Acknowledgement of Allegations

All allegations will be acknowledged to the referring person/organisation by Crawley Town Community Foundation within one working day of receipt, unless:

- The initial information is overtly spurious and is a malicious complaint
- From an anonymous complainant
- The circumstances mean that there are concerns in relation to confidentiality or where there is potential to jeopardise a local authority investigation

Allegations against Crawley Town Community Foundation Staff or Volunteers may be received from (this list is not exhaustive) a:

- Complaint or whistleblowing made directly to Crawley Town Community Foundation by a member of staff or a volunteer (including those from partner organisations), a child or young person or their parent/guardian or other party involved in their care, a member of the public including current or previous participants of Crawley Town Community Foundation activities
- Notification made by a statutory agency that an investigation is taking place by the Police or LSCP, whether it is directly related to their role within the Crawley Town Community Foundation or not e.g. safeguarding concern away from their employment
- Notification of concerns raised to the NSPCC
- Notification of concerns raised to contract holders such
- Notification of an investigation and/or suspension by The FA in accordance with their regulations
- Conviction, caution, or reprimand information revealed on a DBS certificate or as part of a self-declaration, including during the recruitment process
- Separate internal disciplinary investigation

- Concern which has escalated from a formal or informal complaint

6.3 Informing the Safeguarding & Incident Manager of Allegations and Concerns

Allegations relating to Crawley Town Community Foundation staff and volunteers must always be referred to the Crawley Town Community Foundation Designated Safeguarding Lead within one hour of the information or concern being known.

Internal Escalation of Allegations and Concerns

The Crawley Town Community Foundation Designated Safeguarding will also inform the Foundations Safeguarding Trustee and HR Trustee to ensure that Management Procedures and Disciplinary Procedures can be followed (where appropriate and only where to do so will not jeopardise a potential statutory agency investigation).

The SSM will take responsibility for informing the Crawley Town Community Foundation Chair of Trustees.

Note:

- Where the allegation is against the Designated Safeguarding Lead, it should be reported to the HR Manager, who will inform the Chair of Trustees immediately.

6.4 Referral to Statutory Agencies

The Designated Safeguarding Lead will follow the Crawley Town Community Foundation procedure for reporting allegations against staff and volunteers, including referral to the LADO at the relevant LSCP and other statutory agencies where appropriate.

All referrals must take place within one working day of the allegation or concern being raised.

Integrated Front Door: 01403 229900

Out of hours: 0300 222 6664

6.5 Seeking Advice and Ensuring Immediate Safety

In the event of an allegation, the DSL in conjunction with the HR Manager, will take the appropriate steps* to ensure the immediate safety of any individual or group involved, and any others who may be at risk. This may include making a referral to a local authority or The FA Safeguarding Case Management Team where appropriate and considering any recommendations made.

*Appropriate steps may include (this list is not exhaustive):

- Seeking advice or referral to a local authority (LSCP, Police);
- Consulting the EFL Safeguarding & Incident Manager

- Seeking advice from or referral to The FA Safeguarding Case Management Team
- In extreme circumstances, cancellation of an event
- Re-deployment of a member of staff or volunteer whilst a decision to investigate or whilst an investigation takes place. This action would need careful consideration, and may not always be appropriate, where other children, young people or vulnerable groups may then be put at risk
- Suspension of a member of staff whilst an investigation is carried out in accordance with the Crawley Town Community Foundation Disciplinary Procedure as identified in the Crawley Town Community Foundation Employee Handbook
- Adherence of any suspension from football made by The FA
- Any other action as required or enabled within EFL Disciplinary Procedures

6.6 Safeguarding Strategy Meetings and Statutory Agency Investigations

Where allegations suggest suspected abuse, statutory agencies will need to be referred to and any internal investigation would be required to work in parallel to criminal (police) investigations and/or an investigation by local authorities or other statutory agencies. In these circumstances **Crawley Town Community Foundation will not commence with an investigation until a discussion has taken place with the LADO at the relevant LACP/or Police**, to not jeopardise any statutory investigation which may take place or place others at further risk of abuse or place those against whom an allegation has been made, at further risk of subsequent allegations.

Crawley Town Community Foundations management of the investigation will need to consider whether the concerns are subject to:

- A police investigation
- Enquiries and assessment by the LADO at the relevant LSCP to ascertain whether a young person needs protection or services
- Consideration of appropriate disciplinary action in respect of the individual in line with the Crawley Town Community Foundation Disciplinary Policy
- Consideration of any wider disciplinary action in respect of their role or registration to any professional or other regulatory body e.g. The FA, General Teaching Council for England etc.

Following a case discussion or strategy meeting(s) attended by the Crawley Town Community Foundation Designated Safeguarding Lead, and so long as statutory agencies are in agreement that to commence an internal investigation will not impede or potentially jeopardise their investigations, the Crawley Town Community Foundation Designated Safeguarding Lead will plan and identify the scope and timescales for the investigation, in accordance with Staff and Volunteer Allegations Management Procedure, taking into account relevant guidance provided by The Advisory, Conciliation and Arbitration Service (ACAS) to conduct the investigation.

6.7 Referrals to The FA Safeguarding Case Management Team

In accordance with The Football Association regulations, the FA Case Management Team must be **notified within one working day** if there has been an allegation of serious poor practice made against a staff member or volunteer by completing a [Safeguarding Referral Form](#):

The Case Management Team will:

- Conduct a safeguarding investigation based on the information provided. This may include an interview with the staff member/volunteer
- Consult their records for any previous investigations relating to the staff member/volunteer, either while working for the reporting organisation or while at another Club or CCO within the EFL or the Premier League
- Decide on the suitability of the staff member/volunteer. An investigation may lead to the permanent or temporary suspension of the individual

6.8 Referrals to the Disclosure and Barring Service (DBS)

Crawley Town Community Foundation Designated Safeguarding Lead recognise that as an 'employer' of staff and volunteers in roles which may come under the definition of 'Regulated Activity' with a child or young person or other vulnerable group, we have a legal duty to refer an individual to the DBS if they:

- Have been dismissed from working in regulated activity because they have harmed someone while at work
- Have been dismissed or removed from working in regulated activity because they might have harmed someone while at work
- Would have been dismissed for either of these reasons but the individual resigned first

In addition to the above, there are two main conditions which should be met:

- Crawley Town Community Foundation have permanently removed a person from regulated activity through dismissal or permanent transfer from regulated activity (or would have if the person had not left, resigned, retired, or been made redundant)
- Crawley Town Community Foundation believe the person has either:
 - engaged in relevant conduct
 - satisfied the 'harm test' (i.e. no action or inaction occurred, but the present risk that it could, was significant)
 - received a caution or conviction for a relevant offence (a list of these offences is available on the DBS website)

Where these circumstances and/or thresholds are met, the HR Manager will undertake responsibility for making a referral to the DBS. We will refer in accordance with DBS Referral Guidance which can be accessed here:

<https://www.gov.uk/government/publications/dbsreferrals-form-and-guidance>

6.9 Support for Staff and Volunteers Handling Concerns

Crawley Town Community Foundation recognises that managing safeguarding concerns can be an emotive and potentially challenging area of work, which can impact upon those individuals handling such issues. Where appropriate, Crawley Town Community Foundation will offer advice and signposting to staff and volunteers regarding sources of personal support and advice if dealing with difficult situations. In the first instance, this is likely to be the Crawley Town Community Foundation Designated Safeguarding Lead.

6.10 Position of Trust and Relationships of Trust

Position of Trust

The Child Protection in Sport Unit (CPSU) defines a 'Position of trust' as a legal term that refers to certain roles and settings where an adult has regular and direct contact with children. Examples of positions of trust have previously included teachers, care workers, youth justice workers, social workers and doctors.

In 2022 the definition was expanded to include faith leaders and *sports coaches*.

People in these roles or working in such settings may well be in positions of trust and will normally have power and authority in a young person's life and may have a key influence on their future. They will have regular contact with the young person and may be acting in loco parentis.

It's against the law for someone in a position of trust to engage in sexual activity with a child in their care, even if that child is over the age of consent (16 or over).

Relationships of Trust

The Crawley Town Community Foundation endorses the position taken by Affiliated Football, which holds with the principle that there are some roles within sport where adults may not have a legal 'position of trust', but whose role and responsibilities could be viewed as a 'Relationship of Trust'.

A 'relationship of trust' can be defined as where an individual has responsibility for, authority and influence over young people and therefore have an ethical obligation to safeguard and protect young people from exploitation.

The Crawley Town Community Foundation extends these principles of responsibility to non-sport related roles taking place within or network.

Whilst legally, young people aged 16 and 17 have reached the age of consent for sexual activity, any inappropriate sexual relations involving staff and volunteers, with young people aged 16 or 17, will be considered a breach of a '**Relationship of Trust**'. These concerns will be referred to the appropriate football regulatory authorities including The FA Safeguarding Case Management Team and statutory agencies and may be subject to disciplinary action in respect of their employment. Where relevant, we will also make other regulatory bodies aware in those circumstances.

Behaviour and Safe Working Practice & Codes of Conduct

Our staff and volunteers will always adopt the highest standards of behaviour in order that they will maintain the confidence and respect of children and young people, other vulnerable people, parents, customers, partners, clubs and CCOs, other partners and colleagues.

We expect our staff and volunteers to always remember that:

- In their work with children and young people and other vulnerable groups, they will be a role model, in a position to influence and in a position of trust and/or relationship of trust
- They represent the Crawley Town Community Foundation and our parent organisation, Crawley Town Football Club along with any associated partners, and that negative or poor behaviour can have a wide- and far-reaching impact
- They not only represent the organisation in person, but also where they can be identified as being linked to the Crawley Town Community Foundation online, via professional or personal social media accounts

6.12 Safeguarding Codes of Conduct

Crawley Town Community Foundation Code of Conduct

The Crawley Town Community Foundation identifies expected behaviours and conduct for staff and volunteers, with regards to keeping children and young people and other vulnerable groups safe, outlining standards which minimise the opportunity for spurious allegations to be made against staff and volunteers. These are outlined within our Safeguarding Code of Conduct (**see section 14**).

Participant Codes of Conduct

(Children, Young People, Players, and Parents/Guardians etc.)

Our partner organisations should implement their own appropriate participant codes of conduct, in keeping with the principles outlined within guidance from The FA, EFL, EFL in the Community or any

other commissioning partner as appropriate to the activity. These codes of conduct must include reference to their anti-bullying/child-on-child abuse policies.

Crawley Town Community Foundation may from time to time, develop specific event-based Codes of Conduct for participants.

Low Level Concerns

KCSIE 2021 says that leaders should:

“Create the right culture and environment so that staff feel comfortable to discuss matters within and, where appropriate, outside the workplace which may have implications for the safeguarding of children.”

As such, Crawley Town Community Foundation are committed to supporting its staff team and network of CCOs and partners to develop their understanding of the importance of recognising and reporting low level concerns, to make continuous improvements to safer working practices and to prevent patterns of poor behaviour from going unchallenged and escalating to serious conduct issues, which may put children and young people at harm.

Where staff or volunteers act in a way which is inconsistent with the staff code of conduct, (including inappropriate conduct outside of work) and this behaviour doesn't meet the threshold of harm or is not considered serious enough for referral to the local authority, this is reportable to the EFL in the Community Safeguarding & Incident Manager, who will keep a record on the MyConcern case management system and monitor any patterns relating to the individual. Low Level concerns are also reportable to the FA case management team via a [Low Level Concerns Notification Form](#), to identify patterns of behaviour of staff members or volunteers moving between EFL, the Premier League, CCOs or Clubs under their umbrella, which may cause alarm.

Low level concerns may include:

- inadvertent or thoughtless behaviour
- behaviour that might be considered inappropriate depending on the circumstances
- behaviour which is intended to enable abuse.

Staff and volunteers are also asked to self-report any instances where their own conduct may have been inconsistent with the code of conduct, or where their behaviour outside of work cause concerns over their suitability to work with children or young people (such as disciplinary proceedings within other roles they may hold relating to vulnerable groups, or criminal proceedings they are facing etc.).

7 Confidentiality

7.1 Confidentiality Statement

Crawley Town Community Foundation will operate on the premise that all information imparted to a member of staff or volunteer will be treated in confidence. Confidentiality is a key issue for children and young people and other vulnerable groups. They may trust a member of staff or volunteer with issues of a personal nature and wherever possible their confidences should be respected.

7.2 Guidelines

Staff and volunteers must become familiar with the following Crawley Town Community Foundation Confidentiality Guidelines and that they are mindful of professional boundaries.

- Staff must not make promises on confidentiality they may be unable to keep
- Staff should always make a young person fully aware of any situation where confidentiality must not be maintained as in a **case of a concern for their safety or welfare**
- Staff or volunteers may be in a situation whereby they are dealing with information that is difficult for the member of staff to process without further advice/support. In this case the young person should be told that the situation will be discussed with another colleague with a speciality in that area, but that confidentiality will be maintained if possible

7.3 Breaking Confidentiality

It is important to seek the consent of the child or young person and take their wishes and opinions into consideration. Any decision to break confidentiality should always be in the best interest of the individual and preceded by informing the young person of what is about to happen and the reason for that decision. There will be no breach of confidence if the person to whom a duty of confidence is owed consents to the disclosure.

It is therefore essential that members of staff understand the balance between confidentiality and the sharing of information. For that reason, they must not promise absolute confidentiality to a child or young person or other vulnerable group as the safety and wellbeing of that person must be the paramount consideration.

Under GDPR and The Data Protection Act 2018, it is clearly stated that data protection is not a barrier to the sharing of information in relation to safeguarding. Schedule 8 of The Data Protection Act 2018 states the conditions for sensitive processing under Part 3 (Rights of the data subject) as:

Safeguarding of children and of individuals at risk

This condition is met if—

(a) the processing is necessary for the purposes of—

- (i) protecting an individual from neglect or physical, mental or emotional harm, or
- (ii) protecting the physical, mental or emotional well-being of an individual.

7.4 Sharing concerns with parent/guardians appropriately

Appropriately sharing information is important in ensuring a robust and considered response to a safeguarding concern. When working with children and young people, it is important to respect their opinions and wishes.

When considering speaking to a parent/guardian about a safeguarding concern or disclosure, it is important to take the following into account:

- If discussing the concern will negatively impact upon the welfare or safety of the individual.
i.e. where the parent/guardian is the alleged perpetrator of abuse or harm
- If the individual consents to you discussing the concern with their parent/guardian

The individual's welfare is paramount and central to any safeguarding actions taken. There is always a commitment to work in partnership with parents/guardians where there are concerns about the individual with care and support needs. Therefore, in most situations, it will be important to talk to parents/guardians to help clarify any initial concerns. For example, if the individual is withdrawn, there may be a clear explanation or additional detailed information which may help to clarify the most appropriate action to take.

Concerns will not be shared with parents/guardians if it is alleged that they are responsible for the abuse or harm, or there is other information to indicate this will put the individual at increased risk. In such situations, this is to be reported to the Safeguarding & Incident Manager as soon as possible and recorded.

All decisions taken regarding the sharing of information will be made in conjunction with the Safeguarding & Incident Manager, who are responsible for recording the decisions made along with the supporting rationale.

7.5 Confidentiality and Allegations against Staff and Volunteers

Consideration should be given to confidentiality where allegations are made against staff and volunteers, and that information should be shared strictly with those who need to know in order to keep children and young people and other vulnerable groups safe and protect those staff and volunteers where such allegations prove unfounded. Key staff who must be made aware in line with the procedure include:

8 Key Responsibilities

This section clearly outlines safeguarding responsibilities at the Crawley Town Community Foundation.

8.1 General Responsibilities

Crawley Town Community Foundation are committed to the principle that ***Safeguarding is everyone's responsibility***. Our staff and volunteers share a collective responsibility to ensure that they:

- Remain vigilant to concerns about young people whilst attending events hosted directly by Crawley Town Community Foundation
- Remain vigilant to concerns about children and young people whilst attending events facilitated by partner organisations and CCOs. For example, when; conducting governance visits, audits and assessments
- Act in accordance with Crawley Town Community Foundation's Safeguarding Policies and Procedures, and bring to the attention of the Crawley Town Community Foundations Designated Safeguarding Lead; suspicions of abuse or poor practice, disclosures or concerns raised about young people, and concerns raised about the conduct of adults or volunteers in relation to their work with vulnerable groups
- Act in accordance with Crawley Town Community Foundation Codes of Conduct for Staff or Volunteers along with the 'Behaviours' identified within the Crawley Town Community Foundation, and any specific Crawley Town Community Foundation Codes of Conduct for events including specific requirements within event or activity risk assessments

- Attend and engage with all relevant safeguarding training opportunities provided
- Comply with and uphold the principles of this policy and any associated policies and procedures

8.2 Specific Safeguarding Responsibilities

Crawley Town Community Foundation Board of Trustees are responsible for ensuring the organisation is operating robust policies, which are fit for purpose and meet the needs of children, young people and other vulnerable groups. Crawley Town Community Foundation is committed to ensuring a safeguarding champion has been appointed at board level, ensuring safeguarding arrangements are considered, scrutinised and that all the trustees are engaged.

Crawley Town Community Foundations Head of Foundation is the Safeguarding Senior Manager (SSM) with responsibility for Safeguarding.

The duties of the SSM are to ensure that:

- Safeguarding strategies and policies are approved by Crawley Town Community Foundations Board of Trustees and that Trustees are supportive and committed to upholding and promoting safeguarding arrangements
- The Crawley Town Community Foundation Senior Leadership Team endorse this Policy and commit to cascading it throughout the organisation and to key partners where appropriate
- This Policy and supporting procedures are fit for purpose and reviewed regularly
- There are safe recruitment practices in place within the organisation
- Safeguarding training is made available to those within the organisation
- Liaison takes place with the EFL, PL, PLCF, LFE, The FA and other appropriate agencies
- Liaison takes place with CCOs and other partner agencies/providers to ensure that appropriate safeguards are put in place
- They personally remain up to date with developments in protection issues for young people

The SSM takes responsibility for informing the Crawley Town Community Foundation Chair of Trustees, The EFL and any other key stakeholders, including the Charity Commission and the Crawley Town Community Foundation Insurers in the event of a significant or catastrophic incident

8.3 Crawley Town Community Foundation Safeguarding Team

The Safeguarding team consists of the **Designated Safeguarding Lead** and **Senior Leadership Team**.

The duties of the Safeguarding Team are as follows:

Designated Safeguarding Lead DSL – Head of Foundation

- Acts as first point of contact for all staff and volunteers to go to for advice if they are concerned about a child or young person, this includes out of hours cover as required
- Supports staff and volunteers through the process of managing concerns they may have about a child or young person
- Manages incoming notifications of safeguarding concerns from Local Authorities and liaises with partners to reach an appropriate outcome
- Ensures that concerns are logged and stored securely in line with data protection regulations on IT systems
- Works in line with the priorities of the SLT & Board to embed safeguarding within the organisation
- Works alongside internal departments to ensure safeguarding arrangements are considered as part of overall programme/activity development
- Develops and implements overarching safeguarding strategy for Crawley Town Community Foundation, underpinning key policies of governing and partner organisations such as The FA and EFL, as well as underpinning the principals of Crawley Town Community Foundation organisational strategy
- Oversees the safeguarding training strategy for Crawley Town Community Foundation, ensuring all permanent and temporary staff, as well as all volunteers are trained in line with national framework and the training requirements of individual contracts
- Ensures company policies and procedures remain current and fit for purpose
- Oversees the collating and reviewing of safeguarding and incident data, making recommendations for future improvements of safeguarding arrangements
- Responds to incidences of poor practice and/or suspected abuse within CCOs or other partner agencies where we manage contractual arrangements, as appropriate to the nature of the complaint
- Alongside HR, oversees the Safer Recruitment process at Crawley Town Community Foundation

Designated Safeguarding Lead DSL – Safeguarding & Incident Manager

- Acts as first point of contact for all staff and volunteers to go to for advice if they are concerned about a child or young person, this includes out of hours cover as required
- Supports staff and volunteers through the process of managing concerns they may have about a child or young person
- Offers guidance and advice to DSOs from CCOs and partner organisations as required
- Manages incoming notifications of safeguarding concerns from Local Authorities and liaises with CCOs and partners to reach an appropriate outcome
- Ensures that concerns are logged and stored securely in line with data protection regulations on IT systems
- Works in line with the priorities of the SLT & Board to embed safeguarding within the organisation
- Works alongside internal departments to ensure safeguarding arrangements are considered as part of overall programme/activity development
- Develops and implements overarching safeguarding strategy for Crawley Town Community Foundation, underpinning key policies of governing and partner organisations such as The FA and EFL, as well as underpinning the principals of Crawley Town Community Foundation organisational strategy
- Oversees the safeguarding training strategy for Crawley Town Community Foundation ensuring all permanent and temporary staff, as well as all volunteers are trained in line with national framework and the training requirements of individual contracts
- Oversees the safeguarding training strategy for delivery to DSOs from CCOs and partner organisations to ensure they are meeting the safeguarding requirements of individual programmes
- Ensures company policies and procedures remain current and fit for purpose
- Works alongside wider Governance & Quality Team to review CCO and partner organisation's safeguarding & incident management arrangements as part of the Capability Code of Practice CCOP
- Oversees the collating and reviewing of safeguarding and incident data, making recommendations for future improvements of safeguarding arrangements
- Responds to incidences of poor practice and/or suspected abuse within CCOs or other partner agencies where we manage contractual arrangements, as appropriate to the nature of the complaint
- Alongside HR, oversees the Safer Recruitment process at Crawley Town Community Foundation

8.4 Additional Safeguarding Responsibilities in the Crawley Town Community Foundation

Line Managers and Volunteer Supervisors

Specific Crawley Town Community Foundation staff are identified as a line manager of staff, or have a responsibility to supervise and coordinate volunteers, as a result they may:

- Have *direct* supervisory contact with children or young people because of Crawley Town Community Foundation or other volunteer opportunities made available from time to time
- Have *incidental* contact with young people as a result of support for project delivery

Those Line Managers or 'Supervisors' have a responsibility to ensure that:

- Issues or concerns around conduct relating to work with children and young people arising from a 'supervision and management' process should be discussed with Crawley Town Community Foundation Designated Safeguarding Lead in order to determine whether the matter should be dealt with as a low-level poor practice concern or a more significant concern, and will be dealt with:
 - in accordance with this Safeguarding Policy and Procedure, including where concerns or allegations (including those against staff) are required to be referred to statutory agencies or partner organisations
- in situations which give rise to organisation development opportunities; used as an evaluative process to inform policy or strategic development. The Crawley Town Community Foundation Designated Safeguarding Lead will make themselves available to support this process and discuss those situations with 'department heads'
 - They support and manage situations in the event of a crisis where they are contacted by a member of staff or volunteer, or where they are physically in attendance at such an event and must refer concerns in accordance with this policy to the relevant DSO, including the Crawley Town Community Foundation Designated Safeguarding Lead and statutory agency in cases of emergencies or where young people are at immediate risk
 - They support a strategic view of safeguarding arrangements within the Crawley Town Community Foundation, and make suggestions for development of relevant initiatives or areas for improvement
 - Ensure activities and events facilitated by the Crawley Town Community Foundation are appropriately risk assessed in accordance with the Crawley Town Community Foundation Health and Safety Policy
 - They consider the safeguarding training needs of their staff

8.5 Contract, Programme Managers and Heads of Department

Crawley Town Community Foundation is contracted to deliver a variety of programmes and, in addition, will further commission or subcontract to a partner organisation. In these situations, the Crawley Town Community Foundation identifies specific Contract and Programme Leads who have a responsibility to ensure that.

- Due regard is given to safeguarding as part of the due diligence, and commissioning process
- Crawley Town Community Foundation has adequate safeguarding arrangements in place to manage the commissioned or contracted programme
- Safeguarding arrangements (*this list is not exhaustive*); policies and procedures, identified DSOs, safeguarding commitments, safer recruitment, H&S arrangements, and appropriate training plans, are in place throughout the commissioned supply chain
- Appropriate Quality Assurance programmes are implemented and monitored to ensure compliance and minimum standards required by such organisations by which we are contracted or are developed internally by Crawley Town Community Foundation

8.6 Media, Social Media, Communications and Marketing

Crawley Town Community Foundation staff identified as having duties within their role for monitoring, managing/uploading content to print and online communication platforms, including social media and video sharing sites, have a responsibility to ensure that.

- They adhere to Crawley Town Community Foundation, EFL, EFL in the Community and The FA's, policy and guidance in respect of social media, appropriate use of photographs and video, including those policies in relation to 'Acceptable Use'
- Images and video footage used as part of print and online
- platforms have appropriate consent in place, by way 'event' or specific programme 'photography, video and image' consent forms
- They monitor, as far as is reasonable and practicable, content, including messages, comments or images posted on Crawley Town Community Foundation social media platforms or any other 'message board facility' made use of from time to time, and that concerns are passed on to the Crawley Town Community Foundation Designated Safeguarding Lead.

8.7 Crawley Town Community Foundation - Event DSOs

Crawley Town Community Foundation may facilitate events where young people may be in attendance. The organising member of staff must take responsibility for identifying a suitable member of staff (where the Crawley Town Community Foundations Designated Safeguarding Lead will not be in attendance) to act as 'Event DSO' who must have attended in house safeguarding training. This must be clearly identified in the Event Risk Assessment. The Crawley Town Community Foundations Designated Safeguarding Lead will make themselves available to support this process. The Event DSO's responsibilities may differ dependent upon the circumstances or nature of the event and will be identified in the event risk assessment, but in general may include:

- Briefing staff and volunteers, and arranging for those organisations present to brief participants at the event about the safeguarding arrangements
- Ensuring they make themselves available to deal with any concerns which arise on the day
- Ensure they are aware of photography and media considerations for the event, including where consent may not have been given, and manage this on the day
- Implement the Crawley Town Community Foundations safeguarding procedures in the event of any concerns, including informing the Crawley Town Community Foundations Designated Safeguarding Lead and keeping thorough record

9 Performance Management and Reporting

Crawley Town Community is subject to governance & quality monitoring to assess its capability to deliver safe programmes and meet safeguarding requirements.

9.1 CCOs

The Crawley Town Community Foundation is measured against the following:

- Capability Code of Practice (CCOP) – CCOP outlines recommendations for effective governance and management and is used as a tool to support CCOs to continually develop their practices
- Crawley Town Community Foundation Due diligence checks
- Project specific Due Diligence checks - Individual projects may have their own requirements for evidencing the organisation's capability to safely deliver programmes.
- Independent Safeguarding Reviews – EFL in the Community, in collaboration with relevant partners (EFL, PL & PLCF) commission a schedule of Independent Safeguarding Reviews for CCOs in the network, taking place on a seasonal basis.

10 Risks associated with Policy

This policy has been developed to ensure considered and robust processes are in place to mitigate risk, while ensuring that the key focuses of the organisation can be achieved. Risks mitigated by this policy include (but are not limited to):

- Putting children and young people and staff/volunteers at risk through an inexperienced or unprepared workforce supervising young people
- Putting children and young people and staff/volunteers at risk through employment of a workforce who have not satisfied safer recruitment requirements
- Negatively impacting the experience of children and young people accessing activities through a lack of consideration of their needs and failing to make reasonable adjustments or implement support measures as required
- A lack of safeguarding provision ensuring that staff are equipped and supported to recognise, manage, and escalate any concerns that may arise
- Failing to share information regarding a child or young person with relevant parties which may be required to ensure they are protected from abuse or neglect
- Failing to learn lessons from concerns that may arise and make continual improvements to processes
- Failing to adequately safeguard personal and sensitive data in line with data protection regulations
- Failing to comply with government legislation in relation to safeguarding and outcomes of governing bodies & contract holders
- Ultimately damaging the reputation of the organisation through poor practice

11 Privacy Implications

Crawley Town Community Foundation recognise its responsibility in protecting the personal information or special category data collected for the purposes of safeguarding children and young people. A robust Data Protection Policy is operated and is underpinned by the General Data Protection Regulations 2018 (GDPR).

For the purposes of protecting a child or young person from abuse or neglect, there may be times where the Crawley Town Community Foundation must share information with specialist agencies, local authorities and/or others involved in their care or support. In such cases, Crawley Town Community Foundation endeavours to clearly communicate who this information will be shared with and for what purpose, seeking the consent and input of the young person where this is possible. Any information shared with other parties will be done so in line with data protection regulations, to ensure that this is done so safely and without compromise.

All information collected for the purposes of safeguarding is recorded and stored securely and is kept for no longer than required. Crawley Town Community Foundation will seek to appropriately communicate what information is being held on a young person, for what purpose and for how long.

12 Equality, Diversity and Inclusion

This policy supports equality, diversity, and inclusion in the following ways:

- Ensuring measures are in place to appropriately identify vulnerabilities and/or care and support needs of children and young people accessing activities, programmes, or events for reasonable adjustments to made
- Supporting the recruitment of staff to ensure children and young people are supported by competent and appropriate staff & volunteers
- Ensuring staff and volunteers have appropriate training and supervision to appropriately carry out their duties in relation to safeguarding
- Fostering an environment where all children and young people can feel safe, flourish, and realise their full potential

13 Policy review and improvement

This policy will be reviewed by the DSL and Safeguarding Trustee once per year as a minimum standard. As part of the duties of the DSL, where significant amends are made to government legislation or guidance or where amends are required as part of ongoing learning and continual development of the safeguarding provision, review and amendment of the policy will be carried out as and when required. A clear history of the policy will be kept, with a record of amendments made. The policy will always be reviewed and agreed by the Crawley Town Community Foundations Board of Trustees before circulation throughout the organisation.

14 Associated procedures, templates or pro formas etc.

This policy should be read in conjunction with the following policies and practice guidance as appropriate to specific programmes or areas of work. Please note that this list is not exhaustive, and Crawley Town Community Foundation is committed to circulate relevant guidance documents to CCOs/partner organisations as they are produced and as amendments are made.

The FA Policies & Guidance	<p>The FA Football Safeguarding Framework and accompanying policies, procedures & guidance can be found on their website.</p> <p>http://www.thefa.com/football-rules-governance/safeguarding</p>
Crawley Town Community Foundation Policies & Guidance	<ul style="list-style-type: none"> ▪ Safeguarding Children Policy ▪ Complaints Policy ▪ Crawley Town Community Foundation Handbook – Specifically Sections relating to Behaviour, Grievance and Disciplinary Procedure, Equal Opportunities Policy, Recruitment, Whistle Blowing and Social Media
Crawley Town Community Foundation Policies, Guidance & Templates	<ul style="list-style-type: none"> ▪ Safeguarding Adults at Risk Policy ▪ Safeguarding Young People & Adults at Risk Easy Read ▪ Capability Code of Practice ▪ Volunteer Policy ▪ Complaints Policy ▪ Whistleblowing Policy ▪ Home Visit & Lone Worker Guidance ▪ Health and Safety Policy ▪ Recruitment & Selection Policy ▪ Recruitment of Ex-Offenders Policy ▪ Data Protection Policy ▪ Staff & Volunteer Code of Conduct ▪ Safeguarding Concern, Accident & Incident Reporting Form ▪ Safeguarding Supervision Policy & Agreement

15 Safeguarding Procedures

Crawley Town Community Foundation and delivery partners deliver a varied portfolio of activities within local communities. Crawley Town Community Foundation is responsible for the direct delivery of activities to children and young people.

The process for any staff member, delivery partner staff, parent/guardian, child or young person, or any other party notifying Crawley Town Community Foundation of a safeguarding concern can be found below.

This also outlines the actions that will be taken by the Crawley Town Community Foundation Designated Safeguarding Lead.

15.1 Reporting a Safeguarding Concern or Disclosure

1	Are you worried about something?	Has a child, young person or adult told you about something, or have seen something concerning?	
2	Is there an immediate danger?	Where a person has been harmed, or are they at immediate risk of harm?	Call 999 for immediate assistance
3	Have you notified the Designated Safeguarding	Notify the DSL of the organisation IMMEDIATELY	Comply with any actions, including making a record
4	Notifying the Designated Safeguarding Lead	Notify CRAWLEY TOWN COMMUNITY FOUNDATION DSL ASAP	darrenford@crawleytownfc.com PHONE: 07519 900303
5	Have you acted on your concern?	Always speak up, even if you're not sure	If you feel you can't report, follow Whistleblowing procedures

15.2 DSL Managing a Safeguarding Concern

1	Advise & Support	<p>The DSL will support our people to:</p> <ul style="list-style-type: none"> ● Respond appropriately ● Sign-post to support services (where appropriate) ● Make thorough and accurate records ● Monitor the situation
2	Make a Referral	<p>The DSL will:</p> <ul style="list-style-type: none"> ● Consult local thresholds for intervention ● Make referrals to the West Sussex Safeguarding Children Partnership or adults board
3	Multi-Agency Collaboration	<p>To manage a concern the DSL works with the relevant agencies appropriate for the concern and is determined on the level/type of the concern.</p>
4	Internal Escalation	<p>In the event of a high-level concern, the DSL will report to the Safeguarding Trustee, as appropriate.</p> <p>Staff/volunteers are advised to follow Whistleblowing policies, as appropriate.</p>
5	Managing Escalation	<p>Allegations of poor practice made against staff/volunteers will be reported to the Foundations Safeguarding Trustee and HR Trustee.</p>

16 Appendices

16.1 Appendix 1 Useful Contacts

Crawley Town Community Foundation Designated Safeguarding Lead: Darren Ford	01293 410000 darrenford@crawleytownfc.com
EFL in the Community Safeguarding & Incident Manager: Tara Lawson	01772 376797 tlawson@efl.com
The Charity Commission	www.charitycommission.gov.uk
West Sussex Adults Social Care Services	01243 642121
The FA/NSPCC	0808 500 5000 24-hour helpline
The FA Safeguarding Case Management Team	0800 169 1863 #6300
Anti-Terrorism Hotline	0800 789 321
NSPCC Female Genital Mutilation (FGM) Help line	0800 028 3550
Forced Marriage Unit (FMU)	0800 050 2020.
Stonewall (LGBTQ+ support & guidance)	0800 050 2020.
The Money Advice Service	www.moneyadviceservice.org.uk
Citizens Advice	www.citizensadvice.org.uk
Hub of Hope Find support services in your local area	www.hubofhope.co.uk

16.2 Appendix 2 Definitions, Categories, Signs and Indicators of Potential Abuse – Children and Young People

Adapted from:

- HM Government Guidance: *Working Together to Safeguard Children (2018)* and *What to do if you are worried a child is being abused, Advice for practitioners (2015)*
- Child Protection in Sport Unit (CPSU) guidance
- Affiliated Football Policy and Procedures
- NHS England guidance
- NSPCC guidance

Categories of Abuse:

Physical abuse

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Potential indicators of physical abuse: *(This is not an exhaustive list)*

- Children with frequent injuries.
- Children with unexplained or unusual fractures or broken bones; and
- Children with unexplained: bruises or cuts; burns or scalds; or bite marks.

Emotional abuse

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only when they meet the needs of another person.

It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children.

These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.

It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. **Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.**

Possible indicators of emotional abuse: *(This is not an exhaustive list)*

- Children who are excessively withdrawn, fearful, or anxious about doing something wrong.
- Parents or carers who withdraw their attention from their child, giving the child the 'cold shoulder'.
- Parents or carers blaming their problems on their child; and
- Parents or carers who humiliate their child, for example, by name-calling or making negative comparisons.

Sexual abuse

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

The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing.

They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

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

Possible indicators of sexual abuse: *(This is not an exhaustive list)*

- Children who display knowledge or interest in sexual acts inappropriate to their age.
- Children who use sexual language or have sexual knowledge that you would not expect them to have.
- Children who ask others to behave sexually or play sexual games.
- Children with physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections or underage pregnancy.

Neglect

The persistent *failure* to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

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

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

Possible indicators of neglect: *(This is not an exhaustive list)*

- Children who are living in a home that is indisputably dirty or unsafe.
- Children who are left hungry or dirty.
- Children who are left without adequate clothing, e.g. not having a winter coat.
- Children who are living in dangerous conditions, i.e. around drugs, alcohol or violence.
- Children who are often angry, aggressive or self-harm.
- Children who fail to receive basic health care; and
- Parents who fail to seek medical treatment when their children are ill or are injured.

Other considerations: including areas identified within: **Affiliated Football Policy and Procedures** and **FA Safeguarding Policy and Procedures for Grassroots Football or NHS England**

Child Sexual Exploitation (CSE)

Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities.

Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example, being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources.

Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

This definition of child sexual exploitation was created by the UK National Working Group for Sexually Exploited Children and Young People (NWG) and is used in statutory guidance for England.

Possible indicators of CSE: *(This is not an exhaustive list)*

- Children who appear with unexplained gifts or new possessions.
- Children who associate with other young people involved in exploitation.
- Children who have older boyfriends or girlfriends.
- Children who suffer from sexually transmitted infections or become pregnant.
- Children who suffer from changes in emotional well-being.
- Children who misuse drugs and alcohol.
- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss school or education or don't take part in education.

Bullying

Persistent or repeated hostile and intimidating behaviour towards a child or young person. Bullying is behaviour that hurts someone else – such as name calling, hitting, pushing, spreading rumours, threatening or undermining someone.

It can happen anywhere – at school, at home or online. It is usually repeated over a long period of time and can hurt a child both physically and emotionally.

Bullying that happens online, using social networks, games and mobile phones, is often called **cyberbullying**. A child can feel like there is no escape because it can happen wherever they are, at any time of day or night

Possible indicators of bullying: *(This is not an exhaustive list)*

- belongings getting “lost” or damaged
- physical injuries such as unexplained bruises
- being afraid to go to school, being mysteriously 'ill' each morning, or skipping school
- not doing as well at school
- asking for, or stealing, money (to give to a bully)
- being nervous, losing confidence, or becoming distressed and withdrawn
- problems with eating or sleeping
- bullying others

Child on Child Abuse

Child on child abuse can take many forms including physical, sexual (e.g. inappropriate touching) and emotional abuse (including bullying). ‘Keeping Children Safe in Education (KCSIE 2018); makes it clear that abuse is abuse and should never be tolerated or passed off as ‘banter’.

Child on child abuse often involves an imbalance of power between the perpetrator and the victim. This could involve perpetrators having control over the relationship which makes it difficult for those they abuse to defend themselves. This imbalance of power can manifest itself in several ways. It may be physical, psychological (knowing what upsets someone), or social (e.g. isolating or excluding someone). It could also include issues such as revenge porn or what are often gender issues (e.g. girls being touched or boys being involved in initiation activities).

Self-Harm

This is where an individual or sometimes a group will intentionally damage or injure their body, physically or by way of ingestion of substances. It is usually used as a way of coping or expressing overwhelming emotional distress.

Sometimes where people self-harm, they may feel on some level that they intend to die. Over half of people who die by suicide have a history of self-harm (NHS England 2016).

However, the intention is more often to punish themselves, express their distress or relieve unbearable tension, or a mixture of the two. It can also be a cry for help.

Possible physical indicators of self-harm (*This is not an exhaustive list*).

These are commonly on the head, wrists, arms, thighs and chest and include:

- cuts
- bruises
- burns
- bald patches from pulling out hair

Young people who self-harm are also very likely to keep themselves covered up in long-sleeved clothes, even when the weather is hot.

Possible emotional indicators of self-harm (*This is not an exhaustive list*)

The emotional signs are harder to spot and do not necessarily mean that a young person is self-harming. If you see any of these as well as any of the physical signs, then there may be cause for concern.

- depression, tearfulness and low motivation
- becoming withdrawn and isolated, for example wanting to be alone in their bedroom for long periods
- unusual eating habits; sudden weight loss or gain
- low self-esteem and self-blame
- drinking or taking drugs

Grooming

Grooming is when someone builds an emotional connection with a child to gain their trust for the purpose of sexual abuse or exploitation.

Children and young people can be groomed online or in the real world, by a stranger or by someone they know - for example a family member, friend or professional. Groomers may be male or female. They can be any age.

Many children and young people do not understand that they have been groomed, or that what has happened is abuse.

Children and young people with disabilities

Research has consistently shown that children with a disability are more at risk of abuse. Disability may be visible such as Cerebral Palsy or invisible such as a learning disability. Many things contribute to this including:

- Poor practice resulting from not understanding the care and support the child needs
- Attitudes and assumptions about disability
- Lack of awareness and the belief that disabled children are not abused
- Factors linked to the impairment i.e. it may be harder to communicate or avoid the abuser if the child depends on them

Hazing

Hazing is any action or situation, with or without the consent of the participants, which recklessly, intentionally, or unintentionally endangers the mental, physical, or emotional wellbeing of a child or young person. Hazing is not tolerated.

An example of hazing would be a group initiation ceremony, where a child is forcibly encouraged to consume alcohol.

Female Genital Mutilation (FGM)

Female genital mutilation is a form of child abuse common to some African, Asian and Middle Eastern communities in the UK. This illegal and life-threatening initiation ritual can leave young victims in agony and with physical and psychological problems that can continue into adulthood. Carried out in secret and often without anaesthetic it involves the partial or total removal of the external female genital organs.

The NSPCC Female Genital Mutilation (FGM) helpline offers specialist advice, information and support to anyone concerned that a child's welfare is at risk because of female genital mutilation. If you are worried that a child may be at risk of FGM, you can contact the 24-hour helpline anonymously on 0800 028 3550 or email fgmhelp@nspcc.org.uk.

If you wish to find out more about FGM then you can access the NSPCC's fact sheet via this link <https://www.nspcc.org.uk/>

Forced Marriage

A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. It is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights.

The Forced Marriage Unit (FMU) operates a public helpline to provide advice and support to victims and those being pressurised into forced marriages. If you are worried that a child may be at risk of forced marriage, you can contact FMU via the helpline on 020 7008 0151 or email fmu@fco.gov.uk. For more information on forced marriages go to www.gov.uk/forced-marriage

Honour based violence

The term 'Honour Based Violence' (HBV) is the internationally recognised term describing cultural justifications for violence and abuse. It justifies the use of certain types of violence and abuse against women, men and children.

HBV cuts across all cultures, nationalities, faith groups and communities and transcends national and international boundaries. HBV is also a Domestic Abuse issue, a Child Abuse concern and a crime.

Domestic Abuse

Domestic abuse is any type of controlling, bullying, threatening or violent behaviour between people in a relationship. But it isn't just physical violence – domestic abuse includes emotional, physical, sexual, financial or psychological abuse.

It can happen in any relationship, and even after the relationship has ended. Both men and women can be abused or abusers, and it can happen in mixed sex or same sex relationships.

Domestic abuse can seriously harm children and young people. Witnessing domestic abuse is child abuse, and teenagers can suffer domestic abuse in their relationships. Children and young people living in homes where domestic abuse takes place are legally recognised to be victims of that abuse, whether they have witnessed or experienced that abuse themselves. **If there is a concern that domestic abuse is taking place within the home of a child or young person, a referral must be made to the LSCP.**

You can read more about domestic abuse here: <https://www.victimsupport.org.uk/crime-info/typescrime/domestic-abuse>

Support for LGBTQ+ children & young people

All organisations have a responsibility to provide services and support for all children and young people – including those who are lesbian, gay, bisexual or transgender. LGBTQ+ children and young people remain largely invisible across sports. This lack of visibility, as well as the misapprehensions about LGBTQ+ people, contributes to an environment of homophobia and transphobia in sport.

Challenging homophobia and transphobia when they occur and creating an environment where everyone feels included is critical.

Every young person has the right to be treated with dignity and respect; this includes all young people who are openly lesbian, gay, bisexual or transgender or are thought to be.

For further information visit www.stonewall.org.uk or to speak with someone call 0800 050 2020.

Radicalisation and Prevent Duty of Care

The Prevent Duty is not about preventing learners or participants from having political and religious views and concerns but about supporting them to use those concerns or act on them in non-extremist ways. Providers from across the sector can find resources here on this website to support them in adopting the Prevent Duty. <http://www.preventforfeandtraining.org.uk/>

Online Safety

There are a number of risks to children and young people associated with delivering activities online. EFL in the Community and the network of CCOs & Partner Organisations recognise that children and young people may be vulnerable to: (list is not exhaustive)

- Online bullying/harassment
- Grooming
- Cybercrimes
- Loss/sharing of personal information or data

EFL in the Community and the network of CCOs & Partner Organisations recognise their responsibility in operating robust policies for the use of online platforms, including strict codes of conduct for staff and users, as well as guidance on how to stay safe online. (See section 14).

Coercive/Exploitative Relationships

Young people may be involved in abusive relationships with children, boyfriends/girlfriends or others outside of the family home. They may be coerced into carrying out harmful, illegal or antisocial activities such as selling/transporting drugs, stealing, carrying out acts of violence or taking part in sexual activity. This can be the case for young people from all backgrounds, however the risk may be increased for those associated with gangs or those who are vulnerable due to mental capacity.

17.3 Appendix 3: Prevent Duty

The government's strategy for countering terrorism CONTEST is split into 4 areas: Pursue, Protect, Prepare & Prevent. All educational institutions must comply with the Prevent Duty under the Counter Terrorism Act 2015.

The Prevent strategic objective is to stop people from becoming or supporting terrorists or radicalisation and challenge all forms of terrorism, including the influence from far-right extremist groups. The Prevent duty is to protect people from all streams of extremist activity and not solely aimed at one specific group.

The Prevent strategy has 3 key objectives and will specifically:

- Respond to the ideological challenge of terrorism and the threat we face from those who promote it
- Prevent people from being drawn into terrorism and ensure that they are given appropriate advice & support
- Work with sectors and institutions where there is a risk of radicalisation which we need to address

Within the Home Office Prevent Duty guidance document, it sets out very clear expectations and responsibilities of board members, leaders, managers and staff.

Some of these are detailed below –

“We expect active engagement from boards, managers, leaders & staff with other partners including the police and regional Prevent coordinators”

“We expect institutions to demonstrate that they undertake appropriate training & development for boards, leaders, managers & staff”

Prevent is part of safeguarding and everyone has a duty to safeguard young people and vulnerable groups from all aspects of abuse, exploitation and radicalisation. Implementing the Prevent Duty can be a sensitive issue, and it is important to reiterate this is not about spying on or about stopping conversations on controversial or sensitive topics. The Prevent Duty is intended to safeguard organisations, participants & staff from being exposed to exploitation or radicalisation and to support the discussion and understanding of complex and controversial issues

Board of Trustees responsibilities under the Prevent Duty –

- Actively engage with partners, including the police & Prevent coordinators
- Undertake appropriate training and development in Prevent Duty
- Exemplify British Values in their conduct
- Ensure robust procedures are in place to ensure any subcontractors are aware of the Prevent Duty and the subcontractors are not inadvertently funding extremist organisations
- Must comply with the requirements of the Equality Act in ensuring that their organisation challenges discrimination and expects all staff and participants to comply with this legislation also
- Must ensure that Crawley Town Community Foundation challenges racism, islamophobia, tackle hate & prejudice-based bullying, harassment and intimidation as part of their commitment to exemplification of British Values
- Responsible for ensuring that the Duty and its requirements are communicated to all levels of the organisation – management, staff, volunteers, parents and participants

Leaders and Managers also have responsibilities under the Prevent Duty. They must ensure:

- They have active engagement with local partners & support groups and regular contact with Prevent lead
- Clear, visible policies and procedures for managing whistleblowing & complaints
- Policies are in place for all who have access to the organisations IT equipment to ensure they are using them safely, legally and securely
- Prevent compliments the organisations safeguarding and equality acts and covers welfare & safety of all
- A risk assessment is carried out to address the organisations implementation of Prevent
- Robust procedures for managing subcontractors and their awareness and implementation of Prevent
- Appropriate training of all staff and education participants in Prevent
- Staff exemplify British Values in their management, teaching/coaching and through general behaviours in the organisation
- That opportunities are used to promote British Values to young people and young people
- Robust procedures for sharing information internally and externally about individuals when a concern arises
- Have clear Prevent referral process with single point of contacts which are known to all staff and participants
- Pastoral care is at the heart of the provision and sufficient pastoral care is available to all young people who are vulnerable or being exploited
- Provide all staff and volunteers training on Prevent and recognising the signs of radicalisation ▪ Building resilience:
- To promote British Values and where appropriate within education or project delivery ensure that specific guidance is provided to those participants ▪ IT policies and training:

- Ensure that young people are safe from terrorist and extremist material when accessing the EFL in the Community I.T facilities
- Regularly check web filter reports and respond to any concerns raised within them
- Revise acceptable use of I.T policies to reflect the Prevent Duty and access to violent or extremist websites

Channel

Channel is a key element of the prevent strategy and is a multi-agency approach to protect people at risk from radicalisation and from being drawn into committing terrorist-related activity by building on existing collaboration between local authorities, statutory partners, the police and the local community. It is about early intervention to protect and divert people away from the risk they face before illegality occurs. Channel is one tactical option employed by prevent and has recently been placed on a statutory footing. To make a referral into the Channel process Crawley Town Community Foundation will contact the relevant local authority children's services helpline number.

Recognising and responding

Identifying someone who is being exploited or radicalised can often be difficult as there is no single pathway to an individual being radicalised. The below information is not exhaustive and the presence of one of these signs or factors does not necessarily mean that an individual is being radicalised or is involved in extremist activity. However, a combination of these factors may increase vulnerability and/or may indicate that an individual needs support.

Safeguarding from radicalisation is no different to protecting from other forms of harm. Crawley Town Community Foundation and its partners are not expected to be experts in identifying signs of radicalisation and extremism; however, they should have policies and procedures in place, ensure that staff have an awareness through education and empower vulnerable groups. Staff should be vigilant and ensure that they respond swiftly and appropriately to concerns.

Vulnerability

- Identity crisis - Distance from cultural/religious heritage and uncomfortable with their place in the society around them
- personal crisis - Family tensions or trauma, sense of isolation, adolescence, low self-esteem, disassociating from existing friendship group and becoming involved with a new and different group of friends, searching for answers to questions about identity, faith and seeking a sense of belonging
- personal circumstances - Migration, local community tensions, events affecting country or region of origin, alienation from UK values, having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy
- Unmet aspirations - perceptions of injustice, feeling of failure, rejection of civic life
- Criminality - experiences of imprisonment, poor resettlement/reintegration or previous involvement with criminal groups
- Experience of poverty, disadvantage, discrimination or social exclusion
- Learning difficulties/mental health support needs
- Experienced personal trauma, particularly any trauma associated with war or sectarian conflict

Behaviours

- Using extremist narratives and a global ideology to explain personal disadvantage
- Justifying the use of violence to solve societal issues
- Significant shift in behaviour or outward appearance that suggests a new social/political/religious influence
- Conflict with family over religious beliefs/lifestyle/dress choices
- Vocal support for terrorist attacks (either verbally or written)
- Witnessed or been the perpetrator/victim of racial or religious hate crime
- Travel for extended periods of time to international locations known to be associated with extremism
- Change in emotional behaviour e.g. becoming withdrawn or angry
- Sharing of views or trying to influence others with extremist ideology

Access to extremism / extremist influences

- Association with extremist groups or associates/family engaging in extremist activity
- Accessing the internet for the purpose of extremist activity e.g. use of closed network groups, access to or distribution of extremist material, contact associates covertly via Skype/email etc.
- possesses or is actively seeking to possess and/ or distribute extremist literature/other media material likely to incite racial/religious hatred or acts of violence
- Support for groups with links to extremist activity e.g. propaganda distribution, fundraising and attendance at meetings
- Extremist ideological, political or religious influence from within or outside UK

Handling Concerns

In all circumstances, where staff or volunteers have concerns about someone's behaviour or a disclosure which raises concern regarding radicalisation or extremism, the concern must be brought to the attention of the Crawley Town Community Foundation Designated Safeguarding Lead within 24 hours using the same procedures for raising a safeguarding concern.

The Crawley Town Community Foundation Designated Safeguarding Manager will determine whether the concerns relate to safeguarding and therefore necessitate a safeguarding referral to children's services or whether a dual referral is required to both social care **and Channel** or other statutory agency e.g. the police.

17.4 Support available for survivors of historical abuse in Football

In order to support those who have come forward and disclosed sexual abuse in a football context, affiliated football authorities have:

- **Set up a dedicated helpline number for survivors via the NSPCC.** This provides survivors with initial advice and guidance, as well as ensuring referrals are made to the police. From 23 November 2016 to 19 October 2017 the football helpline received more than 2,500 calls. 941 calls were from people

concerned about abuse in football and approximately 65% of these resulted in referrals to external agencies. The remainder of the calls were enquiries and advice contacts.

- **Partnered with Sporting Chance:** This partnership is to provide nationwide opportunities for support to survivors of sexual abuse in football. Sporting Chance has increased the number of available phone lines, tailored the initial face-to face therapist assessment process for survivors, developed a set of criteria to select therapists with expertise in the field, and educated them about the Crown Prosecution Service pre-trial therapy guidance. This is important to ensure that survivors receive support that will not hinder the progress of any criminal or civil justice processes.
- **Offered direct support to all known survivors via the police:** Only the police know the details of the survivors who have come forward to pursue a criminal justice

Review

It is important Crawley Town Community Foundation and partner organisations review and reflect upon incidents and concerns to learn lessons and make continual improvements to their safeguarding provision. Depending on the severity of the concern or incident, the way in which Crawley Town Community Foundation and partner organisations review and make improvements may differ.

Management Information

Policy Name:	Safeguarding Young People
Effective Date:	March 2025
Next Review Date:	March 2026
Drafted By:	Darren Ford
Approved by Board Date:	March 2025
Available to staff and / public via:	<ul style="list-style-type: none">● Crawley Town Community Foundation website (Staff/Public)● Breathe HR Portal (Staff)
Linked Policies or procedures:	<ul style="list-style-type: none">● Safeguarding Adults at Risk● Whistleblowing Policy● Safeguarding Easy Read Guide