

CACT SAFEGUARDING POLICY

Introduction

Charlton Athletic Community Trust (CACT) acknowledges, accepts and is committed to its responsibilities for the well-being and safety of those children and young persons who partake in activities in the name of the CACT. It does so in the belief that placing their welfare at the centre of its concerns provides a solid foundation for the development of young persons and for good Child Protection and Safeguarding practice.

A Trust Dedicated to Welfare

CACT is a caring and responsible organisation. The purpose and aim of this policy and accompanying procedures as laid down in this document sets out to protect all children and young people and provide a framework which applies to all Trustees, staff, volunteers and third party organisations that work, volunteer or provide services. Third party organisations will be asked for their Safeguarding Policies and procedures where appropriate.

CACT fully supports the statement that “Safeguarding is Everyone’s Responsibility”

Summary of Charlton Athletic Community Trust Safeguarding Policy

CACT’s objectives for the development of children accessing CACTs programme are

Promote and support good outcomes in terms of health, development and educational achievement for all children in turn raising both physical and mental wellbeing.

Safeguard children and young people when issues of poor practice, abuse and or exploitation are disclosed or reported.

Enable parents and children to be involved as is practicably possible in a working partnership with the relevant departments of CACT. This includes listening to the wishes and feeling of children and young people and involving them as far as possible in individual decisions and the development of programmes and activities.

Acknowledge its responsibility to set high sporting and social standards of behaviour, be honest and take the feelings of others into account.

Celebrate children’s and young people’s success and recognise achievement, effort and good behaviour.

Provide a disciplined and progressive environment where children will work together taking a pride in themselves and their surroundings.

Equality Statement

CACT is committed to promoting equality in all areas of work including employment and service provision. CACT will work with partners in the community, voluntary, public and private sectors to achieve this.

1) Safeguarding Accountability and Governance

1.1 CACT accepts and adheres to The Football Association (FA) and Football Leagues (FL) Affiliated Football Safeguarding Policy. Along with this, the Trust adopts the guidelines and procedures on safeguarding as laid down in ‘Working Together to Safeguard children 2018’, “Keeping Children Safe in Education April 2019” (Department of Education), the Children’s Act 1989 and 2004) and the “What to do if you are worried a child is being abused: advice for practitioners 2015 .CACTs Safeguarding Policy will be reviewed on an annual basis in consultation with the English Football League, Royal Greenwich Borough and the London Borough of Bexley. CACT will also incorporate and include the following guidance

- Sexual violence and sexual harassment between children in schools and colleges 2018
- Royal Greenwich Borough Safeguarding and London Borough of Bexley Guidance
- The English Football League Guidance Safeguarding Children and Young People 2017
- The FA Affiliated Football Safeguarding Policies and Procedures 2014
- The FA Keeping Football Safe and Enjoyable 2017
- The Data Protection Act 1998.

1.2 CACT recognises that the Children Services Departments, the NSPCC and the Police have a statutory duty to protect children and young persons at risk. CACT accepts that it must work in partnership with these agencies when a safeguarding issue arises and fully supports the concept multi-agency working.

1.3 The CACT Board of Trustees has an appointed Safeguarding Lead who works with the CEO and the Designated Officer. Reports are supplied to the Board of Trustees on a quarterly basis and also go to the Personnel and Finance Sub group for examination. Both the Board and Sub Group meetings provide feedback to the Designated Officer as well as guidance and direction. The Board of Trustees also receive training from the Safeguarding Trustee and Designated Officer.

The Safeguarding Policy is adopted by the Board of Trustees after each and every review and then is signed off by the CACT Chief Executive and endorsed by the CACT Safeguarding Trustee. This Policy applies to all CACT staff and volunteers (paid and unpaid) and to the Board of Trustees.

1.4 The Safeguarding Policy is applicable for all Trustees, staff and volunteers whether paid or unpaid concerned with the management and delivery of CACTs programmes and activities.

1.5 Safeguarding will be an agenda item on all CACTs main meeting including the Trustees meeting, Finance and Personnel, Senior Management Team and the Managers Meeting.

Definition of a Child

Anyone who has not yet reached their 18th birthday. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate, does not change his/her status or entitlements to services or protection.

(Definition provided by Working Together 2015)

Definitions of Abuse

Physical Abuse

This includes hitting, burning and biting, giving children and young people alcohol, inappropriate drugs or poison, attempt to suffocate or drown young children, excessive or inappropriate training regimes and use of drugs to enhance performance or delay puberty.

Neglect

This includes failure to meet a child's or young person's basic needs (e.g. for food, warm clothing etc.) leaving children alone or unsupervised and or fail to ensure children or young people are safe or expose them to undue extremes of weather or risk of injury (e.g. through unsafe equipment). Neglect can also be in the form of emotional neglect where a child or young person lives in an environment of low warmth, stimulation affection.

Emotional Abuse

This can include persistent lack of love and affection, children and young people that are constantly threatened or taunted, adults whose overwhelming ambition exceeds that of the child or young person and persistent disregard of a child's or young person's effort or progress.

Sexual Abuse

This includes situations where adults use children or young people to meet their own sexual needs. This includes sexual intercourse, masturbation, oral sex, anal intercourse or fondling, as well as showing pornographic videos or magazines, or taking photos of children or young people for inappropriate use.

Bullying

It is now recognised that for all categories of abuse the abuser may not always be an adult but could be a child or young person. Bullying may be seen as deliberate, hurtful behaviour, usually repeated over a period of time, where it is difficult for those bullied to defend themselves.

Radicalisation

Radicalisation is defined as the act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic or social conditions, institutions or habits of the mind. Extremism is defined as the holding of extreme political or religious views.

Child Sexual Exploitation (CSE)

Sexual exploitation of children and young people under 18 involves exploitative situations and relationships where the young person (or another) receive “a perceived reward” (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) for the engagement in sexual activities.

CSE can occur through the use of technology without immediate understanding, e.g. being persuaded to post images on the internet or mobile phone without immediate payment or gain. Violence, being pressured and intimidation are common. Involvement in exploitative relationships is often where the child or young person has limited choice as a result of their social, economic or emotional vulnerability. Gang affiliation could be an example of the latter where the child or young person may see an initial positive reason for becoming affiliated not recognising the danger and exploitation that lies ahead.

If a concern is found regarding CSE the established reporting and referral processes will be used will be used, CACT will also make use of established tools such as the RGB CSE Risk Assessment tool of other Borough / County equivalents.

Other issues area that will cause distress and affect a child and young person’s welfare are

- Peer on Peer Abuse
- Gang related activity
- Female Genital Mutilation (FGM)
- Transgender

These areas will be incorporated into the CACT Safeguarding Training Programme to ensure that staff are aware of the issues. The reporting procedures will be as specified in Section Seven of this Policy.

County Lines

County Lines involves the practice of gangs from often large urban areas travelling to smaller locations such as coastal towns to sell drugs. This can also involve the movement of young people who have been recruited to sell drugs between the two locations and is often associated with a period when that young person goes “missing” Young people moving through County Lines are open to exploitation and at a high risk of CSE.

CACT will work with the relevant authorities should that have concerns over young people being involved in this practice.

2) The key principles of the Policy are:

- The child’s and young person’s welfare is and must always be the paramount consideration.
- All children and young people have the right to be protected from abuse and exploitation.
- All children have the right to be listened to.
- All suspicions and allegations of abuse and poor practice will be taken seriously and dealt with promptly
- As above in point 1.2 working in partnership with other organisations, the young people and children and their parents and carers are essential.

CACT has a clear role to play in safeguarding children and young people by protecting them from, physical, sexual or emotional harm and from neglect or bullying. This applies to all staff working for the Trust whether in a paid or voluntary capacity.

3) Safer recruitment and Training

Safer recruitment

3.1) CACT recognise the importance of Safer Recruitment. All staff engaged in regulated activity (as set down via the statutory guidance from Government) whether they are full time, casual or voluntary should undergo the following checks and procedures:

- Complete an application form and attend an interview. The interview will include a member of CACT staff that has undertaken Safer Recruitment training.
- Provide 2 references from 2 different professional sources

- Provide copies of original certificates of qualifications.
- Be able to prove identity with 2 different forms of ID.
- Be able to prove the right to work in the UK.
- Undergo a DBS Enhanced Disclosure producing the necessary documents (referencing the statutory guidance on regulated activity). This will also include checks against the barred list if appropriate.
- Observation of the delivery of an activity if appropriate.
- Attend and induction where the CACT Safeguarding Policy and Procedures will be explained.
- Attended an appropriate level Safeguarding workshop.
- CACT will ensure all staff has an opportunity to attend free courses that are provided by the Greenwich Safeguarding Children and London Borough of Bexley Safeguarding Boards.
- The DBS has to be renewed every 3 years

All staff will be required to familiarise themselves with the content of their job descriptions around their responsibilities for safeguarding children.

Any issues relating to concerns raised over disclosures on the DBS will be discussed in terms of the risk that disclosure poses to children by a panel made up of the Safeguarding Officer, appropriate programme manager responsible for this area and a member of the HR Team. The owner of the DBS will also be invited to this meeting. A recommendation will then be made to the Safeguarding Trustee and the CEO.

Recruitment of ex-offenders

3.2 As an organisation Charlton Athletic Community Trust (CACT) assesses applicants suitability for positions which are included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order using criminal record checks processed through the Disclosure and Barring Service (DBS), CACT complies fully with the DBS Code of Practice and undertakes to treat all applicants fairly. CACT undertakes not to discriminate unfairly against any subject of a criminal record check on the basis of a conviction or other information needed.

The Rehabilitation of Offenders Act 1974 (“1974 Act”) primarily exists to support the rehabilitation into employment of reformed offenders who have stayed on the right side of the law.

Under the 1974 Act, following a specified period of time which varies according to the disposal administered or sentence passed, cautions and convictions (except those resulting in prison sentences of over four years and all public protection sentences*) may become spent. As a result the offender is regarded as rehabilitated.

The 1974 Act places limits on what convictions and cautions an employer can ask an individual about and what they can take into account. Any employer can ask a person to disclose unspent convictions and take these into account. Where the job or activity is listed in the Exceptions Order, a standard or (where the role is listed in Regulations made under the Police Act 1997) an enhanced disclosure certificate can be requested, and an employer can ask a person about any unprotected spent convictions and cautions – that means those spent convictions and cautions which are not protected and would be disclosed on a DBS certificate (under the rules described above).

3.3 An application for a criminal record check is only submitted to DBS after a thorough risk assessment has indicated that one is both proportionate and relevant to the position concerned. For those positions where a criminal record check is identified as necessary, all application forms, job adverts and recruitment briefs will contain a statement that an application for a DBS certificate will be submitted in the event of the individual being offered the position. All applicants will be subject to CACT's Safer Recruitment process.

CACT ensures that all those in CACT who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences. CACT also ensures that they have received appropriate guidance and training in the relevant legislation relating to the employment of offenders, e.g. the Rehabilitation of Offenders Act 1974.

At interview, or in a separate discussion, CACT ensures that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Any member of staff that has content on their DBS when presenting themselves for an activity will have been risk assessed and will have been deemed as presenting no risk to any person on that activity. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment. This is in line with the Football League Recommendations as well

3.4 CACT will ensure that project delivery partners where appropriate have a safer recruitment process which will include the required level of DBS check and that staff have undergone safeguarding training within the last 3 years. This will be stipulated in any Service Level Agreement or contact with that third party.

Training

3.5 Training will have to be undertaken by all staff every 3 years. Football staff will be required to attend the FA Safeguarding workshop whilst non-football staff will be required to attend the Royal Greenwich and the London Borough of Bexley Safeguarding Boards Basic Awareness workshops. Educational staff will receive training updates on a yearly basis at the start of the new academic year. Additionally staff may be required to attend Safeguarding Training at Level 2 and Level 3 if their particular role requires this.

4) Whistle blowing

4.1 CACT is committed to achieving the highest possible standards of service and the highest possible ethical standards in public life and in all of its practices. To achieve these ends, it encourages freedom of speech. It also encourages staff to use internal mechanisms (whistleblowing) for reporting any malpractice or illegal acts which are of a **safeguarding** concern (potential harm to a child or adult) or omissions by its staff or volunteers including ex staff and volunteers.

Internal issues

- If staff and or volunteers have concerns about another staff member or volunteer then this should be referred to the CACT Designated Safeguarding Officer.
- Where there are concerns about the CACT Safeguarding Officer these should be referred to the CACT Safeguarding Trustee or in their absence the CACT Chief Executive Officer (CEO)
- In both the above the managing allegations procedures will be followed as laid out in section 8 of this policy and will potentially result in the reporting of the incident to the Local Authority Designated Officer (LADO) and statutory services.

External issues

For external issues please contact either the Designated Safeguarding Officer or the Safeguarding Trustee or both. This again could result in the reporting of the incident to the Local Authority Designated Officer (LADO) and statutory services.

More information can be found in the CACT Whistle Blowing Policy.

Contacts

**The Designated Officer / CACT Safeguarding Officer is Barry Simmons
0208 850 2866 / 07816 848677**

The Safeguarding Trustee is Ken Palmer 0208 921 4438

The CACT CEO is Jason Morgan 0208 850 2866

5) Designated Person and Safeguarding Trustee

5.1 CACT in line with the FA policies and procedures has appointed a designated person to deal with first reports of poor practice or abuse. This person will be known as the Designated Safeguarding Officer or CACT Safeguarding Officer but will perform the same functions as the FA's Club Welfare Officer. The Safeguarding Officer will have attended the FA Club Welfare Officer workshop and be trained to DSO Level Three. This falls in line with the recommendations from the Football League and the Premier League. The Safeguarding Officer will provide support to colleagues in CACT as and when appropriate regarding safeguarding concerns.

Role of the Designated Safeguarding Officer

5.2 The CACT Safeguarding Officer will receive the first reports of poor practice / care and or abuse and will liaise with the relevant services to report the concerns be it the Local Authority Designated Officer (LADO), MASH Teams, Children's Social Care, the Police or the County FA Welfare Officer if the concerns are football related. The CACT Safeguarding Officer will keep CACT staff informed of all action and conclusions to any safeguarding referrals and reports as appropriate.

5.3 The CACT Safeguarding Officer has the responsibility for updating all CACTs Safeguarding Policies and Procedures and for arranging training for all staff as and when required and in line with the set renewal dates by the relevant appropriate bodies such as the Football Association and Local Authorities.

5.4 The CACT Safeguarding Officer and Charlton Athletic Football Club (CAFC) Safeguarding Officer will meet on a quarterly basis as a means to develop Safeguarding Policies and Procedures and share and develop best practice. This meeting will also include members of the personnel function from both CACT and CAFC and other staff as deemed appropriate.

5.5 The CACT Safeguarding Officer has the responsibility of preparing reports for the Safeguarding Trustee and the Senior Management Team.

5.6 The CACT Safeguarding Officer will also have the responsibility of reporting all allegations against staff to the relevant LADO and making possible referrals to DBS if appropriate (this is a legal requirement).

5.7 The CACT safeguarding Officer will work with the CACT HR officer to ensure that safer recruitment practices are followed and revised when needed.

5.8 The CACT Safeguarding Officer will receive regular supervision from the CACT CEO and Safeguarding Trustee. In turn supervision will be provided for CACT staff involved in any safeguarding work or cases.

5.9 The CACT Safeguarding Officer will be responsible for the generation and maintenance of safeguarding case files in line with GDPR legislation and ensuring these are stored safely.

Role of the Safeguarding Trustee (SSM)

5.10 The CACT Safeguarding Trustee will represent the Safeguarding Function on the Board of Trustees and will provide the Board with updates and guidance on new legislation and practice. This will also be disseminated to the CACT Safeguarding Officer.

5.11 The CACT Safeguarding Trustee will have the responsibility to ensure that all CACT Safeguarding policies and procedures are adhered to.

5.12 The CACT Safeguarding Trustee will provide guidance and support the CACT Safeguarding DSO on an on-going basis. This includes support in dealing with safeguarding issues as they arise and in the production of new policies and procedures.

5.13 The CACT Safeguarding Trustee will deputise for the CACT Safeguarding officer during times of absence i.e. annual leave.

5.14 The CACT Safeguarding Trustee will provide training to the Board of Trustees, to the CACT Safeguarding Officer and assist the CACT Safeguarding Officer in all staff training.

Meetings

5.15 The CACT Safeguarding Officer and the CACT Safeguarding Trustee will formally meet on a quarterly basis just before the Board of Trustee meetings to review all CACT practices and procedures as well as analyse and safeguarding cases that have arisen over the last quarter or on going.

5.16 Ad hoc meetings will also be arranged as and when needed.

Everyone's responsibility

5.17 All CACT staff and volunteers have a safeguarding responsibility. As per the reporting procedures the initial contacts will be the Programme Lead and the Designated Safeguarding Officer. Please ensure that the name of your Programme lead is known to you.

**The Designated Officer / CACT Safeguarding Officer is Barry Simmons
0208 850 2866 / 07816 848677**

The Safeguarding Trustee is Ken Palmer 0208 921 4438

6) Identification and Referral of Child Abuse

6.1 The protection of children and young people is the proper concern of everyone in a position to help. All staff and volunteers at the Trust who are involved with children and young people will be made aware of how to recognize child abuse and make appropriate referrals to the CACT Safeguarding Officer. Training in this will be provided by the Trust in the form of the FA/NSPCC accredited "Safeguarding Children" course or the Greenwich Basic Safeguarding workshop. All staff will have to renew this every 3 years. Additional training is provided by the Greenwich and London Borough of Bexley Children's Safeguarding Boards Board and staff will be able to access these courses as well.

In addition any child or young person who is subject to a child protection plan, who are looked after or subject to any other intervention will be supported in conjunction with and guided by the statutory services and professionals.

7) Reporting Procedures

7.1 If there are concerns about a child or young person **then report this in the first instance to the CACT's Safeguarding Officer** and inform the Programme Lead Officer unless they are part of allegation. See CACT Reporting procedures and flow chart for more information.

7.2 If the issue is one of poor practice then CACT's Safeguarding Officer will either:

- Deal with the matter internally with the support of SMT and the programme Lead Officer
- Seek advice from the CFA Welfare Officer (football related incidents only).

7.3 If the concern is one of abuse then the CACT referral form can be used to report this to the Programme Lead and the CACT Safeguarding Officer. The CACT Safeguarding Officer will then contact the Police, Children's Services, Multi Agency Safeguarding Hub (MASH) or the Local Authority Designated Officer or all or some of the latter depending on the nature of the concern. Guidance will be taken from the

Referral policies and procedures from Royal Greenwich Borough and the London Borough of Bexley.

The CACT Safeguarding Officer will also contact the relevant CFA Welfare Officer and FA Case Manager if the concern is a football related one. Guidance will also be sought The English Football League Guidance Safeguarding Children and Young People (2017) and The FA Affiliated Football Safeguarding Policies and Procedures

7.4 If the allegation is against the Safeguarding officer then all information should be directed to the CACT CEO or Safeguarding Trustee who will action as above.

7.5 The same procedure will be in place if the Safeguarding Officer is absent.

7.6 If the child or young person needs immediate medical treatment they should be taken to hospital or an ambulance called. If the latter is the case then the ambulance staff should be informed that there is a child protection concern. The CACT Safeguarding Officer should then be informed to take the necessary actions in point 7.3.

7.7 As stated in the Trust Dedicated to Welfare section “Safeguarding is Everyone’s Responsibility” and therefore all staff need to be aware of their duties to report any issue that causes a concern by following the above and referencing CACTs Safeguarding Reporting Procedures.

7.8 If the abuse is historical (i.e. non-recent abuse) in nature similar reporting procedures will be followed as above.

7.9 Information will be shared with appropriate organisations if it safeguard a child or young person from potential abuse of abuse that is already occurring. This will be in line with CACTs Data Protection and Information Sharing Policies. All referrals and information sharing will be handled with the strictest confidentiality and only shared with organisations that need to know.

7.10 The CACT Designated Safeguarding Officer will collaborate with the CAFC Designated Safeguarding Officers on all relevant reported concerns or issues.

7.11 With regards to serious incidents the CACT Major Incident Management Plan may be implemented which includes specific responsibilities of staff and the handling of media interest.

8) Managing allegations against staff and volunteers

All allegations against staff will be taken seriously particularly if they:

- Behaved in a way that has harmed a child, or may have harmed a child.
- Possibly committed a criminal offence against or related to a child.

- Behaved towards a child or children in a way that indicates they are unsuitable to work with children.

First reports can be made to Programme Leads who will inform the CACT Safeguarding Officer or reports can go straight to the CACT Safeguarding Officer. Once received the Safeguarding Officer will work with SMT to investigate the case and then bring in appropriate responses. The CACT Disciplinary Policies and Procedures will be used to guide this process. Appropriate responses could include:

- Referral to the Local Authority Designated Officer (LADO). This will be carried out **immediately** if this is required.
 - Royal Greenwich Borough LADO 020 8921 4438
 - London Borough of Bexley LADO LADO@bexley.gov.uk 020 3045 5543
 - Kent County Council LADO kentchildrenslado@kent.gov.uk 03000 410888
- If football related informing the County FA, FA Case Management Team and the EFL Trust DSO (all within 72 hours)
 - Kent FA 01622 791850 info@KentFA.com
 - London FA 02076108360 info@londonfa.com
 - FA Case Management Team 0800 0835 902 safeguarding@thefa.com
 - EFL Trust DSO 01772 325800
- Referral to the Police if the case is of a serious enough nature. The police will become the lead agency if they deem the allegation to be a criminal offence.
 - Emergency 999
 - Non-Emergency 101
- Suspension of the member of staff or volunteer whilst the investigation happens or the deployment of either of the latter to alternative work in CACT or the provision of an additional member of staff to work alongside them.
- The CACT Designated Officer has a **legal duty** for a Referral to DBS if it is considered the threshold has been met for this. This is a legal requirement under the Safeguarding Vulnerable Groups legislation 2006.

Please see Appendix Two for more details.

The CACT Safeguarding Officer or designated person shall also be responsible for contacting the parents / carers of the child.

Possible outcomes will be as follows:

- A police investigation of a possible criminal offence.

- Enquiries and assessment by children's social care about whether a child is in need of protection or in need of services.
- Consideration by CACT of disciplinary action in respect of the individual.

In the context of football related issues any allegation that results in the involvement of the police, Local Authority Adult Safeguarding Board or any other statutory team will result in a referral to the FA and EFL Trust Safeguarding Teams.

The CACT Safeguarding Officer will be responsible for the recording all safeguarding issues and updating records kept about the latter and any referrals made. These records will be kept in a designated locked cabinet and only be accessible to the CACT Safeguarding Officer.

As detailed in Section four of this Policy CACT has a Whistleblowing Policy that details the arrangements for reporting issues and incidents in confidence.

Appeals

After any disciplinary action the member of staff subject to the latter has the right to appeal.

The Appeal

If the employee wishes to appeal they must:

- Write to the person named in the letter of outcome within the time frame specified in the written decision (normally within 5 working days from receipt of the outcome)
- Set out any grounds for their appeal along with any supporting documentation
- State whether they are appealing against the finding that they have committed the alleged act(s), against the penalty imposed or if the procedure was not followed correctly

The Appeal Hearing

CACT will invite the employee to a meeting to discuss the appeal setting out:

- The date, location and time for the hearing
- The person who will hear the appeal
- The right to be accompanied

At the Appeal Hearing the employee will be allowed to explain their case and the Trust will respond accordingly.

The Outcome of Appeal

The employee will be informed in writing of the decision and of the fact that the appeal was the last stage and that the process has been exhausted.

If a football related incident the member of staff may have the right of appeal to the FA to any suspension placed on them following the FA's procedures. Contact the FA Safeguarding Team for more information on 0808 800 5000.

Please see the flow diagram in Appendix Two for more information

9) CACT Complaints procedure

CACT aims to provide a professional and approachable service for members of the public, customers and all service users who need help, advice and information relating to any aspect of CACT's activities. CACT works hard to ensure that a high level of customer service is provided by all of our employees at all times.

If you have a complaint which is related to the safeguarding of children or adults you can contact us in the following ways:

By post to:

The CACT Designated Safeguarding Officer
Complaints C/O Administration Officer
Charlton Athletic Community Trust
CAFC Training Ground
Sparrows Lane
New Eltham
SE9 2JR

By telephone: 020 8850 2866

By email: info@cact.org.uk

Office hours are Monday to Friday, 9am to 5pm.

CACT will acknowledge your complaint within three working days of receipt of the complaint and send a formal response within 21 working days. CACT will attempt to resolve all justifiable complaints within this timescale however, if this cannot be done,

CACT will update the complainant on progress of the complaint.

If you are not happy with the response you have the option of taking the complaint to the Chief Executive Officer after 28 days if dissatisfied with the progress made.

Please note that details of all complaints are recorded and if you use this complaints procedure you are agreeing that we can use personal information you send us for purposes connected to your complaint.

10) Access to the CACT Safeguarding Policy

The Safeguarding Policy will be accessible to parents, carers, children and young people in hardcopy and via the CACT website and to coaches and staff via the Shared Drive and BREATHE HR alongside other policies. This will also be available in accessible formats.

Information will also be placed in all CACT facilities where activities take place to inform parents / carers / children of where they can access the Policy and Procedure. Where appropriate the CACT Safeguarding Policies and Procedures will be physically displayed as well.

11) Use of Mobile phones / social networking sites and communication to children and young people

- All staff must communicate to children and young people in an appropriate manner.
- Staff wishing to communicate with children and young people outside of CACT activities must do so via parents and carers.
- No mobile phone numbers or E mail addresses should be taken and stored on devices belonging to a member of staff.

Staff must not use social networking sites such as Facebook or Twitter to communicate with children and young people on CACT programmes. A CACT Facebook page does exist where non personalised messages can be sent to groups involved in CACT sessions i.e. cancellation of a certain session or a reminder about events. If a young person tries to establish a relationship with a member of staff this request must be denied and the CACT Safeguarding Officer informed so that they can liaise with that child's / young person's parents / carers.

CACT also has a separate E safety policy which outlines its responsibilities and those of the children and young people when using computers etc. in a CACT activity.

12) Consent and the taking and use of images.

Written Consent must be obtained for any child / young person to attend any activity or programme run by CACT. This should be from their parent or carer. In some situations for Look after Children consent can be gained from an assigned social worker

CACT will not allow photos or videos to be taken of children or young people unless there is specific parental / carer written consent.

Parents and carers and the children and young people will be informed of the use of the images as well and where possible be given copies of these. Parent's children and young people have a right for their images to be taken down at any time including all previous images.

No personal cameras / phones etc. may be used to record such images.

When the image is used CACT will not identify the name of the child / young person.

13) Codes of Conduct

All staff will be asked to sign codes of conduct which sets out the working practices and parameters of their responsibilities and engagement.

Where appropriate parents / carers and children and young people will be asked to sign codes of conduct setting out their responsibilities and expected standards of behaviour. A clear list of sanctions is also available to view setting out CACT responses to non-compliance to these codes. This could be for example exhibiting aggressive and or threatening behaviour towards staff and other children or young people or damaging property etc.

Please read the CACT Code of Conduct for guidance on Safer Working Practice

14) Discrimination

CACT will not accept any behaviour and or language which are considered to be discriminatory with prejudice or is oppressive towards any race, gender, culture, age, disability, religion, sexuality or political persuasion

15) Disabled Children and Adults at Risk

Children and young people with a disability are at an increased risk of abuse. This could be due to:

- Lack of peer group support
- Intimate / physical care / invasive medical care meaning that the young person does not know what is appropriate and non-appropriate touch
- Communication difficulties
- Difficulty in resisting and reporting abuse
- Multiple carers
- Dependant on a potential abuser for basic needs
- Having medical conditions that could be used to falsely explain non accidental injuries

CACT will ensure that staff working with disabled children and young adults:

- Learn the child's / young person's communication methods
- Ensure the young person's needs are known
- Ensure care plans are in place
- Give the child or young person the opportunity to make informed choices
- Have clear strategies to deal with difficult behaviour

An adult at risk is defined by the provision of support and care that they are receiving. By having a disability or mental health issue alone this may not constitute that they are an adult at risk. If they receive support i.e. by a statutory service to enable them to deal with everyday living then they would most likely meet the definition. Please consult CACT's Adult at Risk Policy available on the Shared Drive or BREATHE HR

16) Assessment of partner safeguarding policies and procedures

If working in partnership with partners for the purpose of the delivery of programmes and activities CACT will ask as minimum for evidence of

- Safeguarding Policies and reporting procedures including allegations made against staff and whistleblowing procedures.
- A Designated Safeguarding Officer and their level of training (DSO Level 3 as a minimum)
- Training of staff and at what level and frequency
- Safer recruitment procedures including interview, induction and probation
- Staff code of conduct
- Completion of DBS checks if appropriate for the roles.

CACT reserves the right to use their own Safeguarding Policies and Procedures if concerned about the response of a partner to any safeguarding issue. This will be reflected in any Service Level Agreement.

17) Specific projects

National Citizen Service (NCS)

The NCS Team will report all issues to the CACT Safeguarding Officer who will follow the procedures for reporting abuse and allegations against staff as laid down in this policy but these will be also uploaded onto the NCS Pharos system. The NCS Safeguarding Team will categorise the issue from a Level of One (most serious) to Level Five (least serious). Certain safeguarding issues will have involvement with the NCS Safeguarding Team (usually Level One and Two issues). The CACT NCS Team and the CACT Designated Officer will work with the NCS Safeguarding Team to resolve these.

Health Team

Most of the cases with the Health Improvement Team will use the CACT reporting procedures as laid down in this policy. In the case of the CACT / Oxleas NHS Trust Healthy Schools programme if a safeguarding issue is raised via the questionnaires then this must be reported to the School Designated Safeguarding Officer with the CACT Safeguarding Officer copied in. Oxleas NHS Trust will also be notified with appropriate details by the Health Improvement Team.

New programmes of activity

Any new programme of activity or one which is undergoing renewal and or improvement will include safeguarding in the planning brief influenced by any known risks that maybe encountered or otherwise, any known information about the group and activity and will take into account any knowledge held by third party agencies and /or stakeholders including information sharing governance.

The views of the young people will also be taken into account with regards to being and feeling safe on any new programmes of activity and what they would like a safeguarding function to look like.

18) Monitoring and review

The CACT Safeguarding Policy will be reviewed on an annual basis usually coinciding with the start of a new academic year to tie into the CACT Educational programmes. The Policy may also be updated if there are organisational changes, the development of new activities or programmes, changes due to safeguarding incidents and or new legislation. The reviewed Policy will be sent to the appropriate Board of Trustees meeting for formal adoption on an annual basis as well

19) Contacts

CACT Safeguarding Officer	Barry Simmons	0208 850 2866 / 07816 848677
Secondary Contact	Jason Morgan	0208 850 2866
Safeguarding Trustee	Ken Palmer	0208 850 2866

www.cact.org.uk

Royal Greenwich Borough

Royal Greenwich Borough (RGB) Local Authority Designated Officer (LADO) via the Children's Safeguarding Unit on 020 8921 4477

RGB Children's Services Contact and Referral Team 020 8921 3172

RGB Children Services out of hours 0208 854 8888

RGB Safeguarding Children Board
020 8921 4477 or safeguardingboard@greenwich.gov.uk

RGB Safeguarding Children Board – Staff Training and Development
020 8921 5713 or safeguardingtraining@greenwich.gov.uk

London Borough Bexley

London Borough of Bexley Safeguarding Children's Service	020 8303 7777
London Borough of Bexley Out of Hours service	020 8303 7777

E mail safeguardingchildren@bexley.gov.uk

LSCB-Training@bexley.gov.uk 020 8303 7777

Kent Specialist Children's Services - Central Duty Team 08458 247 100
social.services@kent.gov.uk

Bromley Safeguarding Children's Board 0208 461 7816 BSCB@bromley.gov.uk

FA/NSPCC helpline 0808 800 5000 / Text phone 88858

FA Safeguarding Team 08001691863 E mail Safeguarding@TheFA.com

English Football League (EFL) Trust DSO ctaylorefltrust.com

PHAROS (NCS programme only) incident@ncstrust.co.uk

Related Policies and documentation

CACT Reporting Procedures
CACT Adults at Risk Policy
CACT Whistleblowing Policy
CACT Health and Safety Policy
CACT Code of Conduct
CACT Lone Working Policy
CACT Risk Assessment Policy
CACT Social Media Policy
CACT Equal Opportunities Policy
CACT Complaints Policy and Procedures

Reviews

Reviewed 05/06/2018 Reviewed 28/09/2018

Reviewed 06/09/2019 Next review 06/09/2020

Trustee Endorsement 18/09/2019



Signed
Barry Simmons

CACT Safeguarding Officer

Date 18/09/2019

As the Chief Executive Officer, I endorse this Policy to be current and a true reflection of Charlton Athletic Community Trusts Safeguarding policies and procedures



Signed
Jason Morgan
CACT CEO

Date 18/09/2019

Endorsement by CACT Safeguarding Trustee

As Safeguarding Trustee, I endorse this Policy to be current and a true reflection of Charlton Athletic Community Trusts Safeguarding policies and procedures

Print name Ken Palmer

Position Safeguarding Trustee

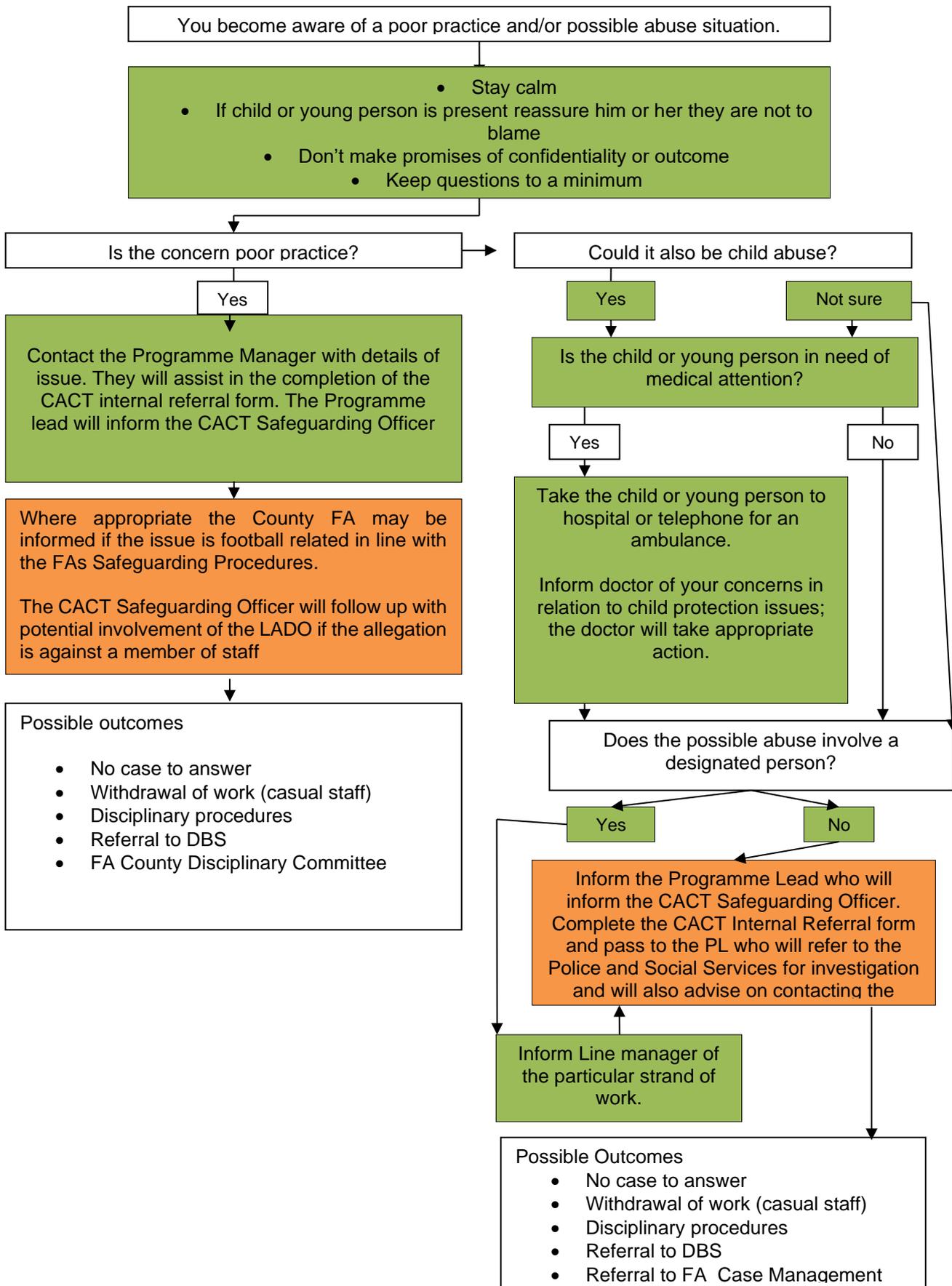


Signed Ken Palmer
CACT Safeguarding Trustee

Date 18/09/2019



Safeguarding Policy



Key

CACT = Charlton Athletic Community Trust
FA = Football Association

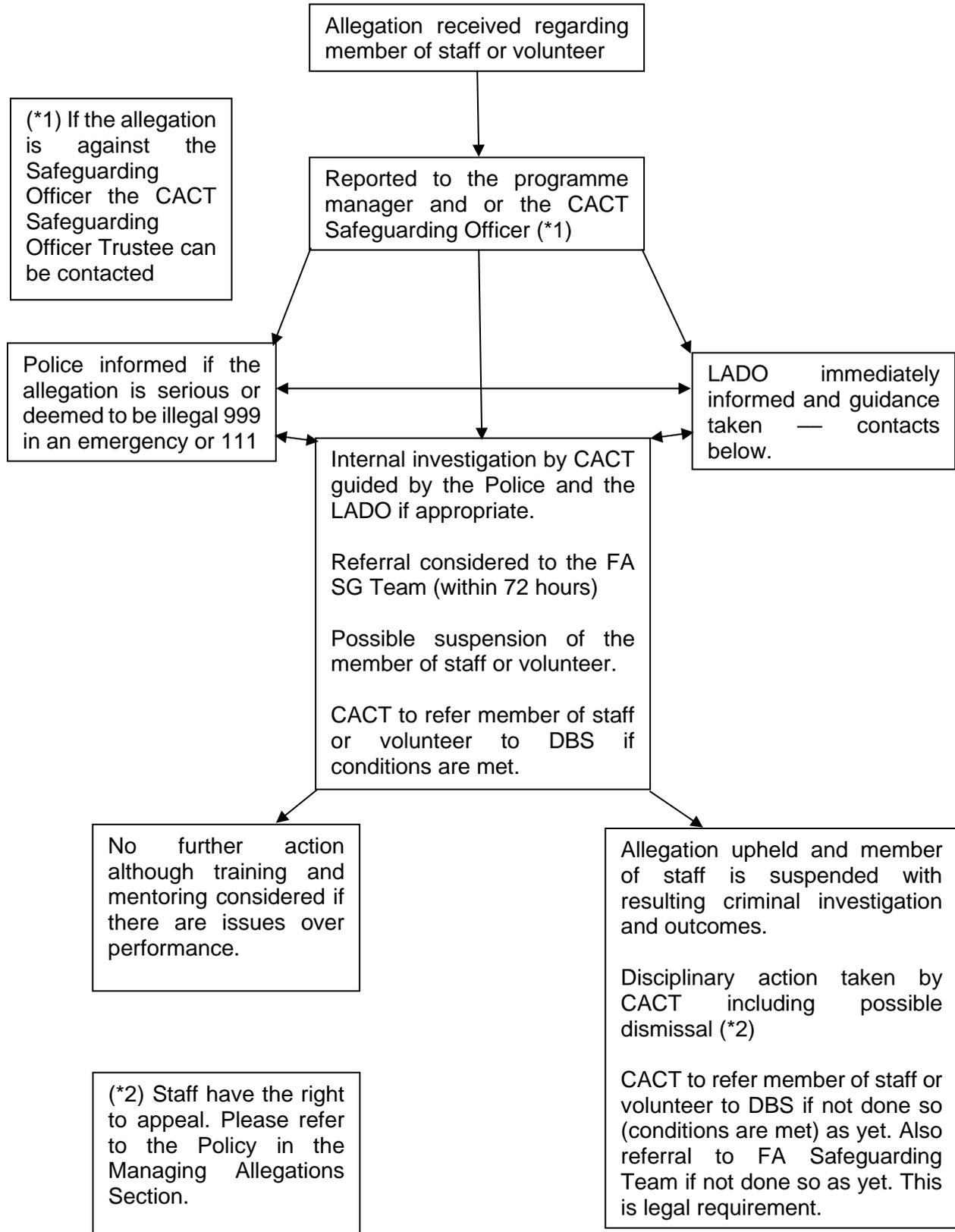
Safeguarding Staff

CACT	Designated Safeguarding Officer	Barry Simmons
CAFC	Designated Safeguarding Officer	Kiran Dingri
CAFC Academy Education and Welfare Officer		Joe Francis

Officer responsibility /
actions

CACT Safeguarding
Officer responsibilities /
actions

Appendix Two Managing Allegations against Staff and Volunteers



Appendix Two Contacts

Royal Greenwich Borough LADO 020 8921 4438

London Borough of Bexley LADO LADO@bexley.gov.uk 020 3045 5543

Kent County Council LADO kentchildrenslado@kent.gov.uk 03000 410888

FA Case Management Team 0800 0835 902 safeguarding@thefa.com

This Covid-19 Addendum summaries key Covid-19 related changes to this Safeguarding Policy, updated on 5 July 2020.

It is envisaged that the CACT Safeguarding procedures in terms of reporting will remain the same during the COVID 19 Pandemic. However, there will be changes to programme delivery and this the following arrangements will be in place

- 1) Youth Service sessions will be delivered virtually via Zoom. A specific Risk Assessment is in place, procedures for staff and a code of conduct for young people. Additional safeguards will include
 - Parents and carers will have to consent for their children to be involved.
 - The environment the young person uses must be suitable for the Zoom session and there must be a parent / carer in the same room.
 - If a safeguarding concern is raised then staff will act accordingly in line with CACT Safeguarding Policy.
 - If a third party is delivering a session then CACT staff will oversee the delivery.
 - No personal equipment will be used to deliver the sessions and the Zoom Accounts will be those owned by CACT.
 - Staff will deliver in pairs and must dressed appropriately for the session. All sessions are recorded and held centrally.
- 2) The CACT mentoring programme will continue virtually and the same safeguards will be in place as above. Where a meeting is held externally then this must be in a public area with a parent or carer present. With the Current COVID 19 situation it is not suitable for a member of staff to meet a mentee in the latter's home, CACT facility or any other building until the guidance changes.
- 3) When safe to do so driven by guidance from the Government, Public Health, Local Authorities DFE and Sport's Governing Bodies other programmes will re commence such as Football Development and NCS with appropriate risk assessments and procedures in place. These will be signed off by the CACT Executive and Senior Management Teams, shared with CACT Trustees and if appropriate signed off by external partners such as the Local Authority, Premier League and EFL.

When programmes do recommence, specific guidelines will be developed to demonstrate to young people and their parents / carers the manner in which CACT will keep young people safe following the guidance regarding social distancing, hand washing, sanitising and cleaning equipment. These methods will be available via CACTs official social media sites and will be sent to parents / carers if they have a child that books on any activity.

All programmes will be booked in advance and there will be no open access so numbers can be controlled in line with the aforementioned social distancing procedures.

- 4) There will be no changes to CACTs Safer Recruitment Policy and Procedures. Adjustments may be made to the interview process which may be conducted virtually but the other aspects such as DBS check, request for references etc will remain the same. During the COVID 19 general recruitment may also be halted with recruitment only agreed for key positions should a member of staff leave.