



Safeguarding Children Policy and Procedure

Policy Name: Safeguarding Children Policy and Procedure

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Contents

1. Policy Statement, Principles and Aims
2. Scope
3. Safeguarding Strategy
4. Roles and Responsibilities
5. Good Practice and Code of Conduct
6. Unacceptable Practice
7. Staff/Child Relationships

Procedures

8. Safer Recruitment
9. 'My Concern' online reporting platform
10. Matchday Safeguarding Arrangements
11. Safeguarding Reporting Process
12. Low Level Concerns
13. Complaints Procedure and Whistleblowing
14. Managing Allegations against Staff
15. Reporting Procedure for the Safeguarding Lead
16. Staff Training
17. Photography and Images
18. Social Media and E-Safety
19. Types of Abuse and Neglect
20. Specific Safeguarding Concerns
 - Bullying and Cyber-Bullying
 - Contextual Safeguarding
 - Child Sexual Exploitation
 - Female Genital Mutilation
 - Radicalisation

Appendices

(b) Club Safeguarding Contact Details

Reference Legislation

- Social Services and Wellbeing (Wales) Act 2014
http://www.legislation.gov.uk/anaw/2014/4/pdfs/anaw_20140004_en.pdf
- Working Together to Safeguard People: Volume 5 – Handling Individual Cases to Protect Children at Risk 6
- Working Together to Safeguard People: Volume 6 – Handling Individual Cases to Protect Adults at Risk
- Wales Safeguarding Procedures
http://www.myguideapps.com/projects/wales_safeguarding_procedures/default/
- Keeping learners safe: managing allegations of abuse against teachers and others engaged in education services in Wales 2022
[Keeping Learners Safe \(gov.wales\)](#)

1. Policy Statement, Principles and Aims

POLICY STATEMENT

Wrexham Association Football Club ('the Club') is committed to safeguarding and protecting children and adults at risk who engage in Club organised activities.

Safeguarding is about protecting children and adults from abuse or neglect and educating those around them to recognise the signs and dangers.

The Club is determined to ensure that all necessary steps are taken to protect from harm, those children and adults at risk who participate in organised activity by Wrexham AFC including the Academy, Women's and Community elements of the club.

The Club takes its responsibilities seriously in this area and we are committed to:

- Getting the right people involved through safe recruitment and training.
- Creating a safe environment for all visitors, participants and staff.
- Having and promoting clear systems to report and deal with any issues or concerns.

Collectively, Wrexham AFC has an ongoing duty and commitment to ensure the game is a safe, positive and enjoyable experience for the thousands of children, young people and adults who regularly play, watch, coach, referee and volunteer; participating within a broad spectrum of activities at the Club.

PRINCIPLES

One of the most important principles of safeguarding is that it is **everyone's** responsibility. Each professional and organisation must do everything they can to ensure that children and adults at risk are protected from abuse.

The Board of Directors at Wrexham Association Football Club ('the Board') are committed to continually ensuring the well-being and safety of all children and adults at risk connected with our business activities, and to providing a safe and suitable environment for all those attending our premises for any purpose. It is the duty of all adults working in the Club to safeguard the welfare of children and adults at risk by creating an environment that protects them from harm.

The Safeguarding Lead works closely with the Local and North Wales Safeguarding Board for advice, guidance and referrals. The Safeguarding Lead will be guided by and adhere to Local Authority and Police protocols.

POLICY AIMS

- To develop a safe and welcoming environment for children and adults at risk involved in all Club-led activities ensuring they are free from abuse and the fear of abuse in all its forms;
- To foster a culture where safeguarding practice is widely understood, openly discussed and where the workforce recognises the role they play in keeping children, adults at risk, themselves and colleagues, safe from harm;
- To promote a clear system that supports constant alertness, prevention and early intervention in safeguarding matters and where necessary prompt and thorough action in response to any reported concerns or incidents;

- To apply legislation, government policy and guidance, and football governing body regulations, policy and guidance where applicable; and
- To work closely together with statutory agencies and other partners to promote and safeguard the welfare of children and adults at risk.

DEFINITIONS

A child is defined as anyone up to their 18th birthday. This definition will cover the phrase 'children and young people'.

'The Children's Act 1989'

2. SCOPE

This policy and procedure is for use across the Club and is to be adhered to by all. Any safeguarding concerns regarding Adults at Risk will fall under the Wrexham AFC 'Safeguarding Adults at Risk' Policy and Procedure.

All the requirements of this policy are obligatory and are to be enforced where there are any suspected instances of poor practice or abuse. All staff members, including full time, part time or casual as well as any consultants, partners or volunteers must make themselves aware of the Club's Safeguarding Children Policy and Procedures.

The Board may amend this policy at any time. The Board will continue to review this policy to ensure it is achieving its aims.

Failure to comply with this policy may be treated as misconduct and be dealt with under our Disciplinary Procedure and if a breach amounts to gross misconduct this may result in dismissal, possibly criminal prosecution and reporting of any incident to the appropriate regulatory or investigative body.

The well-being of children is paramount for all staff and accordingly, they must read and fully understand this policy. Where appropriate, the following guidelines will be supplemented by in-service training and additional guidance.

All employees; casual workers, consultants, contractors and volunteers have the responsibility to report any concerns to the Safeguarding Lead.

The policy will be widely available at all Wrexham AFC facilities on request for those without access to the internet.

Activities undertaken at the following locations and departments are under the remit of this policy, including:

- Wrexham AFC Racecourse Stadium including all matchday roles and activities that come into contact with children
- Wrexham AFC Academy (Colliers Park)
- Wrexham AFC Women (The Rock)
- Wrexham AFC Community Trust
- Travel, Events and Supporter Liaison
- Other club related entities and activities undertaken outside of the UK

The Club has a responsibility to maintain regular dialogue with the Local Safeguarding Childrens Board. The Club will refer concerns that a child may be at risk of significant harm to Childrens' Social Services, the Police or in cases of suspected radicalisation to the Channel Scheme as appropriate. The Club will refer to Childrens' Social Services any incident or allegation against a person in Relationship of Trust.

3. Safeguarding Strategy

The Club's Safeguarding Strategy sets out the Club's strategic approach for the next three years to ensure that safeguarding arrangements are consistently considered, implemented, and improved. It presents the Club's guiding vision, its objectives, the actions, and measures through which outcomes will be achieved, and underpinning principles.

The strategy acts as a framework through which all those working at or with the Club can better understand and carry out their safeguarding responsibilities, so that adults at risk who engage with the Club can do so in a safe environment.

Our Vision

"To create the safest and most welcoming environment for all participants in any and all Wrexham AFC related activities."

Humphrey Ker, Senior Safeguarding Manager

The vision behind the strategy is to collectively promote and protect the safety and wellbeing of children across the Club, and to create a welcoming and secure environment for them in which they are supported, respected and safe.

Our Priorities

We will do this through:

- **CULTURE:** Encourage a Club-wide, shared commitment to safeguarding, ensuring that safeguarding considerations are embedded into the Club's culture and approach to all work.
- **PEOPLE:** Maintain a professional workforce made up of responsible individuals who are vigilant, proactive, and responsive in their attitude to safeguarding, and are aware of the processes for dealing with safeguarding concerns.
- **AWARENESS:** Provide safeguarding education and awareness both to those at the Club responsible for safeguarding and those at risk of harm, so that individuals are empowered to recognise, report, and speak about their concerns in a safe and supportive environment.
- **COMPLIANCE:** Actively monitor and review safeguarding arrangements, and adjust where necessary, to ensure that they are as effective as possible.
- **HORIZIONS:** Seek out and embrace new opportunities and technology that encourages any form of abuse is prevented from the outset.

Our Foundations

We will achieve this following based on our foundations:

- **DIVERSITY:** Working together within our community to delivery our safeguarding vision
- **EMPOWERMENT:** To empower all those entrusted into our care
- **EQUALITY:** Treat everyone fairly and equality without exception
- **FAMILY:** Continue to champion our reputation as the original family club
- **INCLUSION:** We are committed to creating a welcoming and inclusive environment
- **RESPECT:** Promote a safe and supportive culture
- **TOGETHER:** The Board, staff and partners acknowledge that safeguarding and welfare is everyone's responsibility

4. Roles and Responsibilities

Wrexham AFC

Wrexham AFC believe that all children and young people have the right to take part in sport in a safe environment, free from any risk of abuse.

We take all practical steps to reduce the risk of harm to children involved in any club activities and exercise our moral and legal responsibility to protect them.

Senior Safeguarding Manager

The Senior Safeguarding Manager (SSM) for Wrexham AFC has governance for the Club's safeguarding provision, in consultation with the Club's Safeguarding Lead, and actively promotes safeguarding at Board level.

Safeguarding Lead (SL)

The Safeguarding Lead acts as the first point of contact for all safeguarding matters within the club. The Safeguarding Lead will be responsible for case management and the development and monitoring of policy and procedures.

Main duties include but not limited to:

- Working with others at the club to create a positive, child-centred approach to safeguarding children and adults at risk.
- Play a lead role in developing and establishing the club's approach to manage cases of poor practice and abuse reported to the club.
- Maintain accurate, confidential and up-to-date documentation on all cases of safeguarding and child protection and report where required in line with GDPR.
- Manage referrals to children's social care services, single point of contact (SPOA) the police, the EFL, the FA and the FAW as and when required.
- Central point of contact for internal and external individuals and agencies.
- Represent the organisation at external meetings related to safeguarding.
- Coordinate the dissemination of policy, procedures and resources throughout the club.

- Provide advice and support to all members of staff, volunteers and associates of the club in relation to safeguarding concerns and queries.
- Advise on the club's training needs and the development of its training strategy; provide training where appropriate.
- Play a lead role in maintaining and reviewing the club's implementation plan for safeguarding and protecting children.
- Keep own knowledge up to date.
- To act, at all times, in a manner appropriate to a representative for the football club.
- Hold a commitment to equality and diversity in the workplace.
- Produce a quarterly report for the Senior Safeguarding Manager to present to the Board.
- Be a visible, accessible and approachable presence within the club environment.

Academy Safeguarding Officer

The Academy Safeguarding Officer provides support to the Safeguarding Lead to ensure continued safeguarding compliance, pro-actively promote and raise safeguarding awareness and assist with responding appropriately to safeguarding incidents, concerns and allegations.

Main duties include but are not limited to:

- Work closely with the Safeguarding Lead and Senior Safeguarding Manager to ensure that the club's compliance with statutory obligations under the relevant legislation and adherence to the rules and regulations surrounding safeguarding as laid down by the relevant governing bodies under the club is bound.
- Support staff to respond appropriately to concerns about the welfare or safety of vulnerable groups.
- Conduct risk assessments for all extra-curricular activities including trips and tournaments.
- Provide advice, support and guidance on equality and diversity matters.
- Facilitate parent workshops providing education and resources for key safeguarding matters.
- Be a visible, accessible and approachable presence within the Academy environment.

Wrexham AFC Community Trust Safeguarding Officer (Head of Community)

The Head of Community for the Wrexham AFC Community Trust, works closely with the Club's Safeguarding Lead to ensure continued safeguarding compliance within the Trust, pro-actively promoting and raising safeguarding awareness and assisting with responding appropriately to safeguarding incidents, concerns and allegations.

Main duties include but are not limited to:

- Work closely with the Club Safeguarding Lead, the Community Trust Board and Senior Safeguarding Manager to ensure that the Trust's compliance with statutory obligations under the relevant legislation and adherence to the rules and regulations surrounding safeguarding as laid down by the relevant governing bodies under the Community Trust is bound.
- Support Community Trust staff to respond appropriately to concerns about the welfare or safety of vulnerable groups.
- Conduct risk assessments for all extra-curricular activities including trips and tournaments.
- Provide advice, support and guidance on equality and diversity matters.
- Facilitate workshops providing education and resources for key safeguarding matters as appropriate.
- Be a visible, accessible and approachable presence within the Community Trust environment.

Safeguarding Working Group

The Club's Safeguarding Working Group (SWG) will contribute and ensure safeguarding remains at the fore of all the Club's work. The Group has a collective responsibility to provide support to all departments operationally. The group maximises the diverse Club expertise and experience to help promote and ensure effective safeguarding, welfare, and wellbeing across the business and provide a positive influence and help foster a strong safeguarding and welfare culture within the Club. The group works collaboratively with the Senior Safeguarding Manager and support the operational needs of the Club and those outlined in the Safeguarding Standards framework to maintain effective communication measures and working relationships in relation to safeguarding and welfare across all the constitutes of the Club.

5. Good Practice and Code of Conduct

In order to provide all children with the opportunity of engaging with the club in a safe and positive way, all employees, workers, consultants, agency staff and volunteers should adhere to the following principles and actions and thus ensure that they role model positive behaviours and reduce the risk of allegations, abuse and neglect occurring:

- Listen carefully to children and young people about their needs, wishes, ideas and concerns and take them seriously;
- Treat all children and young people equally not showing favouritism;
- Always work in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication with no secrets);
- Make the experience of the activity fun and enjoyable;
- Promote fairness, confront and deal with bullying;
- Maintain a safe and appropriate distance with children and young people and avoid unnecessary physical contact;
- Where any form of manual/physical support is required it should be provided openly and with the consent of the child or young person;
- If children and young people have to be supervised in changing rooms always ensure coaches etc. work in pairs;
- Request written consent if the club are required to transport children and young people using the Club's Consent Form for any activities, events or significant travel arrangements e.g. overnight stays
- Employees and workers should maintain their qualifications and professional development;
- A qualified first aider is in attendance or readily available;
- Maintain appropriate professional relationships with children and young people, including only engaging with them online with prior approval and through the club's social media channels;
- On trips, ensure that adults should not enter a child or young person's room unless there is a safety concern, in which case two adults should enter and should not invite children or young people into their rooms;
- Be a good role model, this includes not swearing, smoking or drinking alcohol in the company of children and young people;
- Always give enthusiastic and constructive feedback rather than negative criticism;
- Promote the club's vision and values and be an ambassador for those values;
- Ensure children and young people adhere to his/her relevant Code of Conduct;

- Secure written consent for the club to administer emergency first aid or other medical treatment if the need arises;
- Reward effort as well as performance;
- Challenge unacceptable or inappropriate behaviour;
- Encourage children and young people to take responsibility for his/her own behaviour and performance;
- Keep a written record of any incident or injury that occurs, along with details of any treatment given or action taken using the Club's Safeguarding Concern Reporting Form (see appendix).
- Recording safeguarding concerns on the online platform 'My Concern' or within the Safeguarding Concern Reporting Form.

This list is not exhaustive.

6. Unacceptable Practice

The following examples of behaviour are considered poor practice and should be avoided by all employers, workers, consultants, agency staff and volunteers:

- Unnecessarily spending excessive amounts of time individually with a child or young person away from others;
- Being alone in changing rooms, toilet facilities or showers used by children and young people;
- Taking children and young people alone in a car or journey unless written consent is sought from the club's Safeguarding Team for emergency situations;
- Taking children and young people to your home or places where they will be alone with you;
- Sharing a room with children and young people;
- Engaging in rough, physical or sexually provocative games, including horseplay;
- Allowing or engaging in inappropriate touching of any form;
- Using or allowing to be used, inappropriate language towards or in the presence of children and young people;
- Allowing children and young people to use inappropriate language unchallenged;
- Making sexually suggestive comments to children and young people, even in fun;
- Reducing children and young people to tears as a form of control;
- Allowing allegations made by children and young people to go unchallenged, unrecorded or not acted upon;
- Doing things of a personal nature that children and young people can do for themselves.
- Not recording safeguarding concerns on the Safeguarding Incident Form or 'My Concern' application;
- Sending inappropriate text messages or social media messages to children and young people;
- Having children or young people engaged with the club as 'friends' or 'followers' within social networking sites such as Facebook, Twitter, TikTok, and Instagram; and
- Engaging with children and young people on 'one to one' personal electronic communications.

This list is not exhaustive.

7. Staff/Child Relationships

The Club provide advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with children. Staff found in breach of these rules may be subject to disciplinary action and/or a safeguarding investigation.

- Staff should ensure they maintain healthy, positive and professional relationships with all children (Under 18) and Adults at Risk.
- Staff working with children are in a 'position of trust' in relation to young people aged 16 and 17 years. Club personnel must not engage in sexual relationships with them whilst that unequal power relationship exists.
- Even after the young person has reached the age of 18, the Club prohibits relationships between personnel and young people for whom they have previously been responsible.

Abuse of Position of Trust

All staff are aware that inappropriate behaviour towards children is unacceptable and is likely to be unlawful. At all times, their conduct towards children must be professional.

It is important to understand that under the Sexual Offences Act 2003 it is an offence for a person aged 18 or over (A) to have a sexual, relationship with a person under the age of 18 (B), where (A) is in a position of trust, even if the relationship is consensual and (B) is over the age of consent i.e. 16.

However, as this legislation does not include sports roles or sports organisations and settings, Wrexham AFC will take disciplinary action in situations where an adult in a position of authority has abused their position of trust by having sexual contact with a 16 or 17-year-old. Consultation with the Designated Officer for Safeguarding (DOS) at the relevant Local Authority is essential, as is a referral to the Disclosure and Barring Service, and the Affiliated Football Bodies.

If you suspect that an abuse of a position of trust has occurred, is occurring or may occur, you should report this to the Senior Safeguarding Manager or Safeguarding Lead. They will contact the DOS as a matter of urgency and within 24 hours of the concern arising. If the matter relates to a member of the Safeguarding Team or Club Safeguarding Lead please contact:

The Safeguarding Manager at the EFL on **01772 325940** or email: safeguarding@efl.com

SPOA children's – contactable 8:30 - 5 (Mon – Thursday) 8:30 – 4:30 (Friday)

SPOAchildren@wrexham.gov.uk / 01978 292039. Link to public website – [Children's social care | Wrexham County Borough Council](#)

Alternatively, you can seek advice from our statutory partners listed in the Appendix or the 24-hour NSPCC Helpline – **0808 800 5000**.

If you believe someone is in immediate danger call North Wales Police on 999

Procedures

8. Safer Recruitment

Safer Recruitment

The Club recognises that anyone may have the potential to harm or abuse children or adults at risk in some way and is committed to taking all reasonable steps to ensure that unsuitable people are prevented from working with children or adults at risk. We will act reasonably in making decisions about the suitability of the prospective candidate based on checks and evidence including the Disclosure and Barring Service (DBS), barred list checks together with references and interview information. The level of DBS certificate required, and whether a prohibition check is required, will depend on the role and duties of an applicant.

For further details and procedures please refer to the Safer Recruitment and Selection Policy.

9. My Concern and My Voice

My Concern is a secure on-line based software system used by the Club to report, record and monitor safeguarding, well-being and pastoral issues, as well as enabling the Club to identify trends and patterns of harm and abuse, allowing early intervention to support all of our at risk groups.

My Voice is a quick, easy and anonymous reporting of Safeguarding concerns across the wider community; with all reports feeding into the My Concern system.

My Concern and My Voice is used extensively throughout the Club, and all full-time, part-time and voluntary staff, along with players, parent/carers, members of the public, match officials and anyone who partakes or watches activities held at the Club have access to the system allowing them to raise and share concerns including poor practice and confidential reporting directly with the Safeguarding Lead and senior leaders.

All part-time and full-time staff are provided with induction training and a tailor-made account which features a two-factor login feature.

Staff can access the secure system via <https://myconcern.thesafeguardingcompany.com/>

10. Matchday Safeguarding Arrangements

Unaccompanied Children

In accordance with the Club's ticketing terms and conditions, the minimum age that a child is permitted to attend a match at the Club unaccompanied is 14 years old. Any child under the age of 14 must be accompanied by an adult over 18 years of age.

Ball Team - The Department for Education do not regard Match Day Ball Retrievers under school leaving age as either performing or employed, but rather as volunteering (unpaid) and therefore are not subject to employment or performance licenses. However, good practice for children's activities should apply with emphasis on supervision and protection. Parental consent must be in place.

As a general rule ball retrievers:

- will be supervised by the Matchday Ball Team Supervisor
- should be aged 12 and over;
- should undergo an assessment and training to ensure they are suitable for the role;
- should wear the Club clothing, safety information lanyard and fluorescent bib provided.
- will be provided with refreshments by the Club
- will be provided with sun cream, if appropriate. This will be self-applied.

The Academy and Under 16's Girls team will provide the Ball Team for First Team and Women's matches.

Arrangements will be in place for each parent and carer to be on site at the conclusion of the match to collect their child or provide clear instructions regarding the collection of their child. No child will be allowed to leave the stadium without that arrangement being communicated to either the Matchday Ball Team Supervisor or the Safeguarding Lead.

Mascots

Matchday mascots are Junior Dragons. They must attend with a parent/guardian and be returned to a parent/guardian following their pitch appearance.

Official Mascot The role of official Club mascot, 'Wrex the Dragon', will be undertaken by a Trust employee who will hold an Enhanced Level Disclosure and Barring Service Certificate with Child Barring Check, has completed the Club Self Declaration Form and been provided with a copy of the 'Safer Working Practice' Guidance.

11. Safeguarding Reporting Process

Safeguarding concerns will fall into one of the following types:

- the behaviour of an adult towards a child;
- the behaviour of a young person towards other children including bullying by peers;
- risks identified through recruitment processes e.g. a positive disclosure;
- information about an individual provided by statutory agencies or another route;
- allegations of abuse; or
- concerns about harm to a child that has taken place outside of a Club activity e.g. at home or school but identified within a Club activity.

For members of the Club workforce these concerns may apply to both their professional and personal lives and alleged poor conduct may affect their position in the workplace.

How to Raise a Concern

Safeguarding is **everyone's** responsibility. Each member of the Club's workforce has a duty to report any concern about a child or adult at risk. Remember – **INACTION IS NOT AN OPTION.**

If there is an immediate risk of harm, a serious injury or a criminal offence committed, the Police or other emergency services must be involved at the earliest opportunity.

Step 1

If you have a concern of any form of safeguarding poor practice or abuse, raise it first with the Safeguarding, Welfare and EDI Lead. (see Appendix)

Step 2

If you feel unable to raise the matter with the Safeguarding Lead for whatever reason, raise the matter with the Club's Senior Safeguarding Manager. (see Appendix)

Step 3

If these channels have been followed and you still have concerns, or if the matter relates to a Designated Safeguarding Officer or Club Safeguarding Lead please contact:

The Safeguarding Manager at the EFL on 01772 325940 or email: safeguarding@efl.com

SPOA children's – contactable 8:30 - 5 (Mon – Thursday) 8:30 – 4:30 (Friday)

SPOAchildren@wrexham.gov.uk / 01978 292039. Link to public website – [Children's social care | Wrexham County Borough Council](#)

Emergency Out of Hours Duty Team 03450 533 116

North Wales Police on **101** or **999** in an emergency [Web Chat](#)

Steps will then be taken to fully investigate the matter to decide what appropriate action should be taken.

The Club is committed to protecting children and young people and will act to uphold this commitment.

What to do if you suspect abuse or poor practice has occurred?

If you are concerned about the welfare of a child or young person or you are concerned about an adult's behaviour towards a child or young person you must act. Do not assume that someone else will help the child. Safeguarding children is everyone's responsibility.

It is important that you report your concerns to either one of the following using the contact details in the Appendix:

- Senior Safeguarding Manager
- Safeguarding, Welfare and EDI Lead

Don't think "what if I'm wrong?" think "what if I'm right?"

What to do if you receive a safeguarding disclosure from a child or young person?

Stage 1

Deal with the disclosure as it happens and ensure that the child or young person's immediate needs are met and that they feel supported. When a disclosure is made, it is most important to understand that you must not investigate the disclosure yourself. The disclosure must always be taken seriously and dealt with according to the guidance in this Policy, even if the truth of the disclosure is uncertain. You are not expected to act as a social worker, counsellor, judge, jury, or avenge the abuser; you are expected to act in the best interest of the child or young person who may be at risk.

You must:

- Remain calm, put your own feelings aside and listen.
- Allow the child/young person to lead the discussion and to talk freely.
- Use TED (Tell me, Explain to me, Describe to me) to obtain the relevant information but do not use too many questions
- Let them tell you at their own pace. Silences are OK. You do not have to rush to fill in the gaps.
- Record the conversation accurately and as soon as possible after the disclosure using the words or phrases described by the child or young person.
- Accept what the child/young person says without challenge.
- Provide reassurance that you are taking them seriously and they are doing the correct thing by speaking out.
- Never ask questions that may make the child/young person feel guilty or inadequate.
- If physical abuse has taken place, you may observe visible bruises and marks but do not ask a child/young person to remove or adjust their clothing to see them. Make a note of the injuries and upload the detail to the body map within the MyConcern platform.
- Tell the child/young person that you will be contacting the Safeguarding Lead and that you will support them throughout.
- Respect the confidentiality of the disclosure and do not share the information with anyone other than those who need to know. Those who need to know are those who have a role to play in protecting children/young people.

You must not:

- Panic or show that you are shocked;
- Document the conversation whilst the child or young person is disclosing;
- Investigate;
- Give the impression that the child or young person is to blame;
- Ask leading questions;
- Pass judgement on what is being said;
- Make promises of confidentiality;
- Approach the alleged perpetrator.

Remember:

When a child/young person discloses they may feel:

- Guilt: They may blame themselves for the abuse and often feel guilt for telling.
- Ashamed: They may feel mortified about the abuse itself.
- Confused: They may be muddled about their feelings for the alleged abuser.
- Scared: They may be scared of the repercussions. They may be scared of the alleged abuser.

Stage 2

As soon as possible, once the immediate comfort and safety of the child/young person is secured, you must inform a Designated Safeguarding Officer of the disclosure using the contact details in the Appendix. You may make a referral yourself directly to a statutory agency if you are concerned about the child/young person's immediate safety and/or are having difficulty contacting a Designated Safeguarding Officer or if the perpetrator is a Designated Safeguarding Officer. If this is the case, the Senior Safeguarding Manager

must be informed. Every effort should be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a need to know basis only.

Stage 3

All staff trained in the use of the MyConcern online platform must record a concern which will automatically inform the Senior Safeguarding Manager and Safeguarding Lead by email.

Those without access to this should email

safeguarding@wrexhamafc.co.uk

Immediate notes should include:

- Who are you? What is your role? How can the Safeguarding Lead contact you?
- Date and Time of incident
- Place and context of disclosure or concern
- Important facts provided, e.g. names of those involved?
- What is the current position regarding those involved?
- Who knows what information? Who informed them?

What happens next?

All concerns are to be followed up and it is everyone's responsibility to ensure that they are. You should be informed by the Club's Safeguarding Lead within 24 hours what has happened following the report being made. If you do not receive this information, you should be proactive in seeking it out.

If you have concerns that the disclosure has not been acted upon appropriately, you should inform the designated Senior Safeguarding Manager or if unavailable a member of Club's Senior Management, and ultimately contact the relevant statutory agency.

NOTE: A disclosure is not the only way that you may be made aware of an issue. Any adult or child may inform you of a concern or a possible abusive situation. There may be an instance when a member of staff has witnessed an incident that may cause concern or be made aware of a concern by a third party. It is important to stress that the same process is to be followed.

Record keeping and Confidentiality

The Club will record all incidents and concerns using the Safeguarding Concern Reporting Form (see Appendix) or recording the information directly to the online reporting platform 'My Concern'. All such reports will be taken seriously, carefully recorded, acted upon where appropriate and confidentially retained. The Safeguarding Lead will regularly review reported concerns in order to identify patterns of behaviour that may give rise to concern. All information collected and stored, whether verbal or written, will be treated with the utmost sensitivity and handled in accordance with General Data Protection Regulations notwithstanding the Club's obligations to information share with statutory partners and football authorities.

13. Low Level Concerns

Wrexham Association Football Club believes every child, young person and adult at risk who participates our activities should be able to take part in an enjoyable and safe environment and be protected from

abuse. This is the responsibility of everyone involved in Club activities. Wrexham Association Football Club recognises its responsibility to safeguard the welfare of all children, young people, and adults at risk by seeking to protect them from all forms of neglect and abuse.

Wrexham Association Football Club recognises that a critical step to safeguarding is to ensure that all those who work with children, young people and adults at risk in our sport, behave appropriately and that any concerns about an adult's behaviour are identified early and are managed promptly and appropriately.

Wrexham Association Football Club aims to create and embed a culture of transparency and confidence within our Club to enable all concerns about an adult's behaviour (including those below the referral threshold) that are below the expected standards and values of our organisation and does not meet the organisational expectations encapsulated within our Safeguarding Policies and Procedures, can be shared responsibly, with the right person, enabling them to be dealt with promptly and appropriately.

These reports should be recorded under the MyConcern or MyVoice platform.

14. Complaints and Public Interest Disclosure

Complaints Procedure

Wrexham Association Football Club welcomes information from participants, parents and carers in order to improve the overall experience in every area of the Club's activities. This complaints procedure highlights the responsibility of staff at the Club to respond to complaints within three working days of receipt. If a complaint requires additional investigation, the reporting person will be notified of this. All correspondence received is passed to the Head of Human Resources to assess the nature and the extent of each matter before being passed to the relevant Head of Department and in respect of a safeguarding complaint, to the Safeguarding Lead in order for the appropriate action to take place.

The complaints procedure is monitored by appropriately trained staff from the Club's Fan Engagement Team.

Complaints can be made via the following contact lines:

Email: info@wrexhamfc.co.uk

Telephone: 01978 89 1864

Post: Wrexham AFC, STōK Cae Ras, Mold Road, Wrexham, Wales, LL11 2AH

The vast majority of supporter and customer complaints are successfully concluded by the Club. However, if a supporter is not completely satisfied with the outcome of their complaint, they should refer the matter directly to The Independent Football Ombudsman (IFO). Complaints should be made in writing and emailed to: contact@theifo.co.uk. Complaints may be submitted by post to: The Independent Football Ombudsman, Suite 33, Great George Street, Leeds, LS1 3AJ or by telephone (voicemail) on 0800 588 4066. Further information can be found at their website: 'theifo.co.uk'.

Whistleblowing (Public Interest Disclosure)

The Club views the reporting of concerns by members of its workforce as a vital element of maintaining its core values. Individuals are strongly encouraged to report incidents of malpractice where the law, Club policy or protocol have been breached by another member of staff.

These reports should be made to the Head of Department who will make every effort to retain confidentiality.

If your concerns relate to the Head of Department, they should be reported to the Head of HR by email: hr@wrexhamafc.co.uk

15. Managing Allegations against Staff

It is important that all allegations made against staff are reported immediately to the Safeguarding Lead and who will refer the matter to the Head of HR and the Designated Officer for Safeguarding (DOS). This policy is to be cross referenced with the Club Employee Handbook. A referral to the Affiliated Football Bodies will be made within 24 hours.

When an allegation is made against a member of staff, set procedures must be followed. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen.

A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we must accept that some professionals do pose a serious risk to children and we must act on every allegation. Any staff member in a position of trust will be considered under Part 5 of the Wales Safeguarding Procedures, Keeping Learners Safe 2022.

Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly, and consistently and to be kept informed of its progress. Suspension is an entirely neutral act and may assist the unfettered investigation of concerns. However, it is not the default option and alternatives to suspension will be considered. In some cases, staff may be suspended where this is deemed to be the best way to ensure that both the staff member and children are protected. In the event of suspension, the Club will provide support and a named contact for the member of staff.

It is important to add that the Football Association may impose an interim suspension depending upon the circumstances as reported.

Staff are reminded that publication of material that may lead to the identification of a member of staff who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing, including content placed on social media sites.

Subject to restrictions on the information that can be shared, the Head of Department should, as soon as possible, inform the member of staff about the nature of the allegation, how enquiries will be conducted and the possible outcome (e.g. disciplinary action and/or referral to the Disclosure and Barring Service or regulatory body).

The member of staff should:

- Be treated fairly and honestly and helped to understand the concerns expressed and processes involved;

- Be offered appropriate sources of support;
- Be kept informed, at agreed times, of the progress and outcome of any investigation and the implications for any disciplinary or related process;
- If suspended, be kept up to date about events in the workplace.

Non-Recent Allegations

All allegations concerning staff who are no longer employed at the Club, or allegations of non-recent abuse or poor practice must be reported to the Safeguarding Lead who will refer the matter to the North Wales Safeguarding Board and the Police if necessary. This process is to be adopted even if it is established that the alleged perpetrator of the abuse/poor practice is deceased.

16. Reporting Procedure for the Safeguarding Lead.

The Club and its staff are not experts in child protection and will refer issues to appropriate agencies. Upon being notified of an allegation of abuse against a member staff:

- The Safeguarding Lead will ask for a written factual statement (using the Safeguarding Concern Reporting Form) from the person making the report – this must be signed and dated or a completed online version using the MyConcern reporting platform.

If any statement has been made by the child, this should be reported in the child's own words. These reports should be confined to facts and should not include any opinion, interpretation or judgement.

- If the report involves an allegation about a member of staff, this will be referred to the Single Point of Contact for Wrexham County Borough Council Children's Services within 24 hours or as soon as practicable.

Otherwise, if abuse is suspected, the Safeguarding Lead will contact Children's Social Care where the incident occurred or where the child lives. Children's Social Care may involve the police.

The Safeguarding Lead will notify the FA Safeguarding Team, the English Football League and the Football Association of Wales using the Affiliated Football Referral Form within 24 hours or as soon as practicable.

The Head of Department, the Head of Communications and the Head of HR will be informed of the referral.

The parents/carers of the child will be contacted as soon as possible following advice from Children's Social Care or the Police.

- The Safeguarding Lead or line manager will ensure that any child concerned is immediately removed from any possible risk of harm.
- Once Children's Social Care has been informed and the incident accepted as a referral or notification, the Safeguarding Lead will notify the Club's Chief Executive Officer and Senior Safeguarding Manager in writing.
- All information will be dealt with confidentially and shared only with the people on a need-to-know or who-must-know basis.
- If the Safeguarding Lead is implicated, the Club's Chief Executive Officer and Head of HR should be contacted who will inform Children's Social Care in line with the procedure in this section.

17. Staff Training

It is important that staff receive training and awareness to enable them to recognise the possible signs of abuse, neglect and exploitation and to know what to do if they have a concern.

Staff should be aware of systems within the Club which support safeguarding. This includes:

- the Club's Safeguarding Children Policy and Procedure;
- Safer Working Practice;
- the details of the Safeguarding Lead.

All staff members should also receive appropriate child protection information which is regularly updated. The minimum being:

For staff working with children in Regulated Activity:

- The FA Safeguarding Children Workshop every three years

For other staff working with children in a position of authority and trust:

- appropriate safeguarding information and/or training annually;

For all other staff:

- Safeguarding awareness through safeguarding emails and other communications.

Staff are responsible for maintaining their certificates and ensuring that their safeguarding training, first aid and criminal records checks are updated every three years.

New Staff

All new members of staff will undergo an induction that includes familiarisation with the Club's safeguarding and child protection policy and safe working practices on their activities, as well as identification of their child protection training needs. They will be required to sign the Safer Working Practices Guide. We will also work with players and parents to raise awareness of safeguarding issues that may affect them e.g. social media issues. The Safeguarding Lead will undertake Local Authority lead safeguarding training every two years.

Supply staff and other visiting staff working with children

Workers in this group will be given a "Safer Working Practice" booklet. All staff will be made aware of the increased vulnerability and risk of abuse of certain groups, including disabled and SEN children, looked-after children and young carers.

Visitors with a professional role, such as social worker or members of the Police will have been vetted by their own organisation. Any professionals visiting the Club should provide evidence of their professional role and employment details (an identity badge for example). If felt necessary, the Club can also contact the relevant organisation to verify the visitor's identity.

18. Photography and Images

The Club welcomes photographs and images that celebrate the sport, the values and objectives of the Club and positive reflections of our Club operations. We understand however that photography and video imagery and its use can present difficulties, risk and sensitivity in a range of circumstances.

During the course of our activities it is foreseeable that a child's image may be captured by appointed photographers in digital photographs and in film. These images may then be used by Club staff and contractors in both internal and external news and marketing publications and on-line via websites and social media.

Video or Photographs as a Coaching or Management Aid

The recording of training or match footage is a legitimate coaching aid and as such parents and players are made aware that this is part of the coaching programme. Similarly photographs of matches or players for management purposes (e.g. ID passes or databases) are regularly taken. Both these types are covered by data protection law. As such all those responsible for the recording of this footage must:

- adhere to this policy;
- take responsibility for the safe storage and distribution of the images;
- give due consideration to the dignity and protection of the players involved; and
- inform parents where there are changes to the planned use of the footage which will lead to a wider distribution of the images than originally anticipated.

Consent

Where an activity may allow for the capture, and thus use, of a participant's image, the person responsible must develop appropriate documentation (forms and guidance) and associated processes to allow for the management of parental consent (or participant consent in respect of an adult at risk) and ensure that those individuals understand what they are consenting to and why. Consent must provide a genuine choice in order to be valid.

Legitimate Interest

When images are taken for identification or coaching purposes, consent is not normally the appropriate condition for capturing and using such images in this way. Parents and children must be aware that images are being used in this way. Should parents or children have any issues arising out of images being processed for the Club's legitimate interests they may contact our Data Protection Officer on email dpo@wrexhamafc.co.uk Details of all processing activities are documented in the Club's privacy notices available from the Club website.

Opt Out

Other than on match / public event days (see below), individuals have the right to opt-out (i.e. revoke or not give consent) of being photographed or object to their image being used as part of a legitimate interest. The workforce will endeavour to make suitable arrangements to apply any restrictions required whilst also minimising the disruption to normal Club activities. These arrangements will be agreed in advance with those with guardianship or parental responsibility for the individual and must uphold the dignity of the participant opting out.

Storage

All images, whilst held by the Club, will be securely stored on the Club's IT systems and remain the property of the Club at all times. Where footage is passed to players and parents for training and development purposes this must not be passed on further or published without the written permission of the Club's management staff. Families must be made fully aware of this restriction at the point of distribution.

Where consent has not been given but images have been captured, those images should follow the guidelines shown below but also should be of a general nature capturing the activity and not the individual and should not use children's names in resulting public use.

Match Day, Public Events, Incidental Image Capture & Consent

Large crowds may create further questions with consent and image use. At events such as matches, concerts and special public events, explicit consent is not required as there is a reasonable expectation that any person attending may have their image captured or broadcast. In any situations where children may be subject to 'incidental image capture' (i.e. they are in the background behind a main subject), where practical they should be informed that they may be on camera and have the opportunity to opt out.

Where a person finds that their image or that of their child has been used in these circumstances and they do not wish it to be used then we will endeavour to remove it from circulation where it is practical to do so and where there are reasonable grounds to do so.

Parents, Other Children and Other Photographers

The Club recognises that in some circumstance's parents, other family members and friends may wish to take photographs of their children or relatives. Each event will develop clear rules on what is acceptable; by default, photographs are not permitted at private / invitation events. Where a member of staff or child or parent has a concern about the capture and use of images they should report immediately to the activity or site manager.

With the advent of smart phones with digital cameras and instant connectivity to the world wide web, the scope for the capture and sharing of images has increased dramatically and as such activity managers should take care to apply the policy firmly and fairly.

In general, members of the workforce capturing images **must not:**

- using own/personal equipment to capture images of participants;
- capture images taken in changing rooms or where children are not fully clothed;
- use images of children who wish not to be in the photograph or whose parent does not wish them to be;
- use images where children are more vulnerable – upset, injury, illness;
- use images that are sexually suggestive or provocative; or
- the inclusion of young player's full names in any captions, kit or reports.

Matchday photography

Children attend games as spectators. Images of children may appear as part of the crowd on matchdays and be reproduced in official Wrexham Association Football Club promotional material and appear in the public domain.

By entering the Ground, all persons are acknowledging that photographic images and/or audio, visual and/or audio-visual recordings and/or feeds (and/or stills taken therefrom) may be taken of them and may also be used, by way of example and without limitation, in televised coverage of the game and/or for promotional, training, editorial or marketing purposes by the Club, the EFL or others (including commercial partners and accredited media organisations) and entry into the Ground constitutes consent to such use. There is further acknowledgment that photographic images and/or audio, visual and/or audio-visual recordings and/or feeds (and/or stills taken therefrom) may be used (by the Club or by a third party, such as a law enforcement body) to identify individuals, where permitted by data protection laws, for the purposes of preventing or detecting crime, or any breach of Ground Regulations.

Any queries on promotional material featuring a child/children should be addressed to the Safeguarding Lead who can be contacted by email: safeguarding@wrexhamafc.co.uk

The Club accepts no liability for non-Wrexham AFC images and reserves the right to prohibit the use of any photography, video or film on its activities or premises. This includes match days. There is to be no non-Wrexham AFC photographs or images being taken at Academy training or matchdays.

19. Social Media and E-Safety

Children increasingly use electronic equipment on a daily basis to access the internet and share content and images via social networking sites such as Facebook, Twitter, Snapchat and Instagram.

Unfortunately, some adults and young people will use these technologies to harm children. The harm might range from sending hurtful or abusive texts and emails, to grooming and enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings.

Children may also be distressed or harmed by accessing inappropriate websites that promote unhealthy lifestyles, extremist behaviour and criminal activity.

Cyberbullying and **sexting** by children on Club activities will be treated as seriously as any other type of bullying and will be managed through our Anti-Bullying procedures. Serious incidents, such as **sexting and peer-on-peer abuse** will be managed in line with our safeguarding procedures and the guidance from UK Council for Internet Safety (UKCIS): Sexting in schools and colleges, responding to incidents, and safeguarding young people (2017). Many children own or have access to handheld devices and the Club encourages parents and carers to keep their children safe when using the internet and social media at home and in the community by promoting the e-safety campaign Safer Internet Day. As a general rule, children are not allowed to take images on Club activities, in particular images are prohibited in private areas such as: toilets, changing rooms, showers and bedrooms and when other children are in a state of undress.

If you are experiencing online bullying or something else online has worried you please speak to a member of the Safeguarding Lead or to an adult you trust, or you can talk to Childline at any time on 0800 1111 or at www.childline.org.uk

Staff: Any communication using ICT (Information Communication Technology) by staff should be carried out using Club IT, e.g. mobile phone and Club email address. This ensures that Club policies, firewall/filters and security apply.

It is important for staff to maintain professional and personal boundaries in and out of work:

- Staff should not have direct personal communication with children from Club activities using ICT, e.g. email, mobiles (unless an approved arrangement is in place).
- On all social media, any requests from children or their parents/carers should be rejected.
- Concerns arising from contact on social media from children should be directed to a Safeguarding Officer or the Safeguarding Lead. This will help to avoid blurring boundaries between personal and professional life.
- Staff should take care on how they present themselves in the public domain (e.g. internet, media) and their association with Wrexham Association Football Club.
- Staff should use a disclaimer on social media with wording such as 'these views are my own views and not those of the Club'.
- Staff should direct any queries/clarification on this to the Head of Communications or the Safeguarding Lead

For further information, please refer to the Club's Safeguarding and Social Media Policy.

As a general policy, communication with children age under 16 is via the Club through the parent/carer or school/organisation. However, the Club recognises that direct communication with young people may be required on certain activities for professional and welfare purposes and in such circumstances the Safeguarding Lead and Senior Safeguarding Manager should be consulted, and protocols put in place and appropriate consent obtained from the parent/carer.

Filtering: Wrexham Association Football Club has an appropriate filtering system that manages the following content: discrimination; drugs/substance; extremism; malware hacking; pornography; piracy and copyright; self-harm; violence and gambling. This includes the Academy setting at all sites and the WIFI settings for Academy visitors (including parents/carers and children).

Any online concerns are to be reported to the Safeguarding Lead.

What is Abuse?

Abuse is when a child or young person is mistreated or significantly harmed. Abuse can take many forms:

The following is a non-exhaustive list of examples for each of the categories of abuse and neglect:

- **Physical** abuse – hitting, slapping, over or misuse of medication, undue restraint, or inappropriate sanctions.
- **Emotional / Psychological** abuse – threats of harm or abandonment, coercive control, humiliation, verbal or racial abuse, isolation or withdrawal from services or supportive networks.
- **Sexual** abuse – rape and sexual assault or sexual acts to which the child has not or could not consent and/or was pressured into consenting.
- **Financial** abuse – this category will be less prevalent for a child but indicators could be: unusual activity in a bank account by a counter signatory; not meeting their needs for care and support which are provided through direct payments; or complaints that personal property is missing.
- **Neglect** – failure to access medical care or services, negligence in the face of risk taking, failure to give prescribed medication, failure to assist in personal hygiene or the provision of food, shelter, clothing; emotional neglect.

20. Specific Safeguarding Concerns

Bullying & Cyber-Bullying

Bullying and cyberbullying can happen to any child. Wrexham Association Football Club pledges to help keep children safe from bullying, wherever it happens. For further information, please refer to the Club Anti-Bullying Policy.

What is Bullying?

Bullying is behaviour that hurts someone else. It includes name calling, hitting, pushing, spreading rumours, threatening or undermining someone.

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

Bullying can take different forms. It could include:

- physical bullying: hitting, slapping or pushing someone
- verbal bullying: name calling, gossiping or threatening someone
- non-verbal abuse: hand signs or text messages
- emotional abuse: threatening, intimidating or humiliating someone
- exclusion: ignoring or isolating someone
- undermining, constant criticism or spreading rumours
- controlling or manipulating someone
- making silent, hoax or abusive calls
- racial, sexual or homophobic bullying
- bullying someone because they have a disability.

What is cyberbullying?

Cyberbullying is bullying that takes place online. Unlike bullying in the real world, online bullying can follow the child wherever they go, via social networks, gaming and mobile phone.

Cyberbullying can include:

- sending threatening or abusive text messages
- creating and sharing embarrassing images or videos
- trolling – the sending of menacing or upsetting messages on social networks, chat rooms or online games
- excluding children from online games, activities or friendship groups
- shaming someone online
- setting up hate sites or groups about a particular child
- encouraging young people to self-harm
- voting for or against someone in an abusive poll
- creating fake accounts, hijacking or stealing online identities to embarrass a young person or cause trouble using their name
- sending explicit messages, also known as sexting
- pressuring children into sending sexual images or engaging in sexual conversations.

Signs of bullying

No single sign will indicate for certain that your child's being bullied, but watch out for:

- 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 whoever's bullying them)
- being nervous, losing confidence, or becoming distressed and withdrawn
- problems with eating or sleeping
- bullying others.

Effects of bullying

The effects of bullying can last into adulthood. At its worst, bullying has driven children and young people to self-harm and even suicide.

Children who are bullied:

- may develop mental health problems like depression and anxiety
- have fewer friendships
- aren't accepted by their peers
- are wary and suspicious of others
- have problems adjusting to school, and don't perform as well.

All children who are affected by bullying can suffer harm – whether they are bullied, they bully others, or they witness bullying.

Who's at risk?

Any child can be bullied for any reason. If a child is seen as different in some way or seen as an easy target they can be more at risk.

This might be because of their:

- race or ethnic background
- gender
- sexual orientation.

Or it could be because they:

- appear anxious or have low self-esteem
- lack assertiveness
- are shy or introverted.

Popular or successful children are also bullied, sometimes because others are jealous of them. Sometimes a child's family circumstance or home life can be a reason for someone bullying them.

Disabled children can experience bullying because they seem an easy target and less able to defend themselves.

Reporting Bullying

Wrexham Association Football Club will take all reports of bullying, discrimination and harassment seriously and adopt the appropriate process to ensure the reporting person is protected from repeat behaviour.

You may also wish to access any of the following websites designed to give advice and guidance to parents and children who are faced with dealing with bullying:

Guidance for parents/carers

www.anti-bullyingalliance.org.uk

www.stonewall.org.uk

www.kickitout.org

www.bullying.co.uk

Guidance for young people

www.youngstonewall.org.uk

www.kickitout.org

www.childline.org.uk

Contextual Safeguarding: As well as threats to the welfare of children from within their families, children may be vulnerable to abuse or exploitation from outside their families. These extra-familial threats might arise at school and other educational establishments, from within peer groups, or more widely from within the wider community and/or online. These threats can take a variety of different forms and children can be vulnerable to multiple threats, including exploitation by criminal gangs and organised crime groups such as

county lines; trafficking, online abuse; sexual exploitation and the influences of extremism leading to radicalisation. Extremist groups make use of the internet to radicalise and recruit and to promote extremist materials. Any potential harmful effects to individuals identified as vulnerable to extremist ideologies or being drawn into terrorism should also be considered.

Assessments of children in such cases should consider whether wider environmental factors are present in a child's life and are a threat to their safety and/or welfare. Children who may be alleged perpetrators should also be assessed to understand the impact of contextual issues on their safety and welfare. Interventions should focus on addressing these wider environmental factors, which are likely to be a threat to the safety and welfare of a number of different children who may or may not be known to local authority children's social care. Assessments of children in such cases should consider the individual needs and vulnerabilities of each child. They should look at the parental capacity to support the child, including helping the parents and carers to understand any risks and support them to keep children safe and assess potential risk to child.

Child Sexual Exploitation: "Child sexual exploitation (CSE) is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology."

(New definition of CSE from Department of Education & Home Office, February 2016)

What marks out exploitation is an **imbalance of power in the relationship**. Sexual exploitation involves varying degrees of **coercion, intimidation or enticement**, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. A common feature of sexual exploitation is that the child often does not recognise the coercive nature of the relationship and does not see themselves as a victim. All staff should be aware of the indicators of sexual exploitation and all concerns or suspicions must be reported. It may also be linked to **child trafficking**. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse. The child may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

Prevent

The Prevent Agenda was set up as part of the Government's wider counter-terrorism strategy called CONTEST.

It is a UK-wide strategy that aims to stop people becoming terrorists or supporting terrorism.

The strategy's three objectives are:

- To challenge the ideology that supports terrorism.
- To protect vulnerable people.
- To support sectors and institutions where there are risks of radicalisation.

Wrexham Association Football Club has a legal duty to prevent those participating in a learning environment from being drawn into extremism and radicalisation. The Club, in conjunction with its education providers and statutory partners, conducts an annual Prevent Self-Assessment and Action Plan. This supports the Club's commitment to its Equality Policy and overarching duty to protect all persons involved in Club activities as staff, volunteers or participants.

What is 'Radicalisation'?

Radicalisation is a term that refers to a process by which a person comes to support terrorism and forms of extremism leading to terrorism. During that process, it is possible to intervene to prevent vulnerable people being drawn into terrorist-related activity.

Radicalisation is also described as the process where someone has their vulnerabilities or susceptibilities exploited towards crime or terrorism - often by a third party who have their own agenda.

What is Extremism?

Vocal or active opposition to fundamental British Values including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

What are British Values?

Democracy – Over 18-year olds can vote in local and general elections.

The Rule of Law – We understand the importance in having laws which protect us and know the consequences of breaking laws and rules.

Tolerance of those of different faiths and beliefs – We are part of a culturally diverse society

Individual liberty – We have the freedom to make choices about leisure activities we take part in

Mutual Respect – We treat each other with respect.

What makes someone at risk of radicalisation?

The following factors have been identified as increasing an individual's risk of radicalisation:

- Struggling with a sense of identity.
- Questioning their place in society.
- Family issues.
- Experiencing a traumatic event.
- Experiencing discrimination.
- Difficulty in interacting socially and lacking empathy.
- Difficulty in understanding the consequences of their actions.
- Low self-esteem.

How to Spot the Signs of Radicalisation

There is no single pathway towards radicalisation – it is usually a combination of behaviours that are different to each person, according to their personal vulnerabilities.

The following behaviours could be an indication that an individual is becoming radicalised:

- Ignoring or demonising viewpoints that contradict their own.
- Expressing themselves in an 'us vs. them' manner about others who have alternative beliefs,
- Increasingly secretive or unwilling to discuss views.
- Using derogatory language.
- Changing their circle of friends.
- Losing interest in activities they once enjoyed.
- Becoming socially withdrawn or spending a lot of time online.
- Belief in conspiracy theories and distrust of mainstream media.

- Justifying the use of violence or expressing a desire for revenge.
- Secretive about who they talk to online and which websites they visit.

Reporting Terrorism and Suspected Radicalisation

If you suspect someone is involved in terrorism in any way or that someone has been radicalised, you can call the police on 101. You can remain anonymous throughout this process.

If a Prevent concern is identified in relation to an adult, a referral via the All Wales Prevent Referral Form should be submitted into the Welsh Extremism & Counter Terrorism Unit (WECTU). Please see the below links.

<https://digitalservices.south-wales.police.uk/en/all-wales-prevent-partners-referral-form-english/>

<https://digitalservices.south-wales.police.uk/cy/all-wales-prevent-partners-referral-form-welsh/>

If an individual presents with additional care and support this referral should be accompanied by a referral into Adult Safeguarding via email to: AdultsSPOA@wrexham.gov.uk or telephone 01978 291100. If you wish to discuss your concerns with a Club member of staff, please contact the Safeguarding Lead at email: safeguarding@wrexhamafc.co.uk

You can report online material that promotes terrorism or extremism on the GOV.UK website

<https://www.gov.uk/report-terrorism>

Alternatively, you can call the Anti-Terrorist Hotline anonymously on 0800 789 321.

Hazing: Any rituals, initiation activities, actions or situations, with or without consent, which recklessly, intentionally or unintentionally endangers the physical or emotional wellbeing of Children, Young People and Adults at Risk.

Discriminatory abuse: Abusive or bullying behaviour because of discrimination occurs when motivated by a prejudice against certain people or groups of people. This may be because of an individual's ethnic origin, colour, nationality, race, religion or belief, gender, gender reassignment, sexual orientation or disability. Actions may include unfair or less favourable treatment, culturally insensitive comments, insults and 'banter'. Discriminatory behaviour is unacceptable and will be reported to The FA. This includes incidents on and off the pitch (including social media).

Poor practice: This is behaviour that falls short of abuse but is nevertheless unacceptable. It is essential that poor practice is challenged and reported even where there is a belief that the motives of an individual are well meaning. Failure to challenge poor practice can lead to an environment where abuse is more likely to remain unnoticed. Incidents of poor practice occur when the needs of Children, Young People and Adults at Risk are not afforded the necessary priority, compromising their welfare, for example, allowing abusive or concerning practices to go unreported, placing Children, Young People and Adults at Risk in potentially compromising and uncomfortable situations, failing to ensure the safety of Children, Young People and Adults at Risk, ignoring health and safety guidelines, or giving continued and unnecessary preferential treatment to individuals.

Child-on-child abuse: Children and Young People can be taken advantage of or harmed by another child or young person. Child-on-child abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between individuals and within relationships (both intimate and non-intimate).

Infatuations: Children, Young People and Adults at Risk may develop an infatuation with a member of Staff who works with them. Such situations should be handled sensitively to maintain the dignity and safety of all concerned. Staff should be aware that in such circumstances, there is a high risk that words or actions may be misinterpreted and that allegations could be made against Staff. They should therefore ensure that their own behaviour is above reproach. A member of Staff who becomes aware that a Child, Young Person or Adult at Risk may be infatuated with him/her or with a colleague, should discuss this at the earliest opportunity with the Safeguarding Lead.

Domestic violence or abuse: Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged sixteen or over, who are or have been intimate with partners or family members regardless of gender or sexuality. This can encompass, but is not limited to: psychological, physical, sexual, financial, emotional abuse and so called 'honour' based violence.

Safeguarding Contacts

safeguarding@wrexhamafc.co.uk

Club contacts

Senior Safeguarding Manager

Humphrey Ker safeguarding@wrexhamafc.co.uk

Safeguarding, Welfare and EDI Lead

Linos Preece safeguarding@wrexhamafc.co.uk

07852510910

Head of Operations

Julie Greenwood Julie.greenwood@wrexhamafc.co.uk

Academy Secretary, Safeguarding and Welfare

Zoe Denman-Ellis Zoe.denman-ellis@wrexhamafc.co.uk

Head of Women's Football Operations

Gemma Owen gemma.owen@wrexhamafc.co.uk

Head of Wrexham Community Trust

Steve Dale steven.dale@wrexhamafc.co.uk

Other Safeguarding Contacts in Football

The English Football League (EFL) Safeguarding Team

Tel: 01772 325940

Email: safeguarding@efl.com

The FA Safeguarding Team

Tel: 0800 169 1863

Email: Safeguarding@TheFA.com

If you are worried about your **IMMEDIATE** safety or the **IMMEDIATE** safety of another child or adult at risk, call the Police using **999**

Other External Key Contacts:

NSPCC 24-hour Helpline – 0808 800 5000

NSPCC Childline – 0800 1111

North Wales Police – 101 (Non-emergency Number)

**Wrexham County Borough Council Childrens' Services 01978 292039
(office hours)**

**Wrexham County Borough Council Adult Services 01978 291100 (office
hours)**

Emergency Out of Hours Duty Team 03450 533 116