



HULL CITY TIGERS and TIGERS SPORT AND EDUCATION TRUST
SAFEGUARDING CHILDREN AND ADULTS AT RISK
POLICIES AND PROCEDURES

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Amendment history

Date	Version	Author and role	Details of Amendments
August 2021	2	Caroline Adamson, Head of Safeguarding	Annual review, however delayed due to the potential of club's sale.
March 2022	3	Caroline Adamson, Head of Safeguarding and Kayleigh Jackson, Trust DSO	Annual review – Joint Policy approach with the Club and Trust.
February 2023	4	Caroline Adamson, Head of Safeguarding and Kayleigh Jackson, Trust DSO	Amend and update safeguarding structure and amendment to the sexual offences Act in respect of position of trust
March 2023	5	Caroline Adamson, Head of Safeguarding and Kayleigh Jackson, Trust DSO	Amended to add section on gift and favouritism and communication via social media.
May 2023	6	Caroline Adamson, Head of Safeguarding and Kayleigh Jackson, Trust DSO	Amended to reflect the changes in roles at SMC.

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1. Safeguarding Statement:

The safety of children and adults at risk is of paramount importance to Hull City Tigers and Tigers Sport and Education Trust, and we shall continue to do our utmost to help safeguard children, young people, and adults at risk in our care.

At Hull City, we believe that football should be an enjoyable activity for everyone whether as a participant or spectator, child, or adult. We continue to do all we can to encourage the participation of all sectors of the community and to make the involvement in football a healthy, life-enhancing, and safe experience.

As a Club and as a Trust, we are fully committed to safeguarding and providing a safe environment for children, young people and adults at risk and will always take appropriate action to ensure children, young people and adults at risk are safe.

We fundamentally believe that safeguarding and promoting the welfare of children is everyone's responsibility.

2. Introduction:

Hull City recognises our key responsibility to safeguarding the welfare of children and adults at risk, by fully committing to the practice which protects them from any form of harm. Everyone at Hull City has responsibility to make sure that the wellbeing of children and adults at risk is put first and that everyone who comes into contact with children, young people and adults at risk has a key role to play.

In order to achieve this, Hull City Tigers and Tigers Trust has developed a number of policies and procedures designed to ensure that children, young people and adults at risk can enjoy the range of opportunities open to them to participate in activities in a safe environment. This policy sets out a clear and consistent framework for delivering this promise.

3. Safeguarding Team:

Hull City Tigers and Tigers Trust has a Safeguarding Team who can be contacted should you have any concerns. They are as follows:

Caroline Adamson Head of Safeguarding and Club Lead Disclosure Officer **07525873309**

David Beeby	Club Secretary/ SMM	01482 358360
Kayleigh Jackson	Tigers Trust Designated Safeguarding Officer (DSO)	07946368998
Catherine Bishop	Trust CEO, Trust Lead Disclosure Officer	07929207604
Caroline Adamson	Academy Designated Safeguarding Officer	07525873309
Caitlin Card	Academy Player Care Manager and DSO	07561709362
Cliff Edens	SMC Safeguarding Officer	01482 358317

Our Policies and Procedures are regularly reviewed and updated and must be approved by the Board of Directors of Hull City Tigers, the Board of Trustees for the Tigers Trust, in consultation with the EFL. Breach of this Policy may result in a safeguarding investigation and disciplinary action up to and including dismissal.

This policy is reviewed annually by the Safeguarding Steering Group and is amended when new legislation and guidance is issued by the Government.

4. How we Safeguard Children, Young People, and Adults at Risk:

Safeguarding is placing the safety, welfare and wellbeing of children, young people, and adults at risk, at the centre of what we do. We will listen, encourage, and respond to children, young people, and adults at risk views, and want to ensure that children, young people and adults at risk to feel safe and happy.

Hull City Tigers and Tigers Trust are committed to ensuring the safety and well-being of children, young people, and adults at risk in the following ways:

Recruitment:

- Making sure that people are recruited who are suitable to work with children, young people and adults at risk. Hull City Tigers and Tigers Trust intend to ensure that: -
- All staff, full or part time and including volunteers, having access to, and working with, children and adults at risk, have an Enhanced Children's and Adults Disclosure and Barring Service check every three years.
- Contractors such as maintenance and IT providers are required to complete a basic disclosure and barring service check every three years.
- All staff and volunteers must supply at least two references as part of the recruitment procedure.
- All relevant staff receive the Club/Trust safeguarding induction, appropriate training, and guidance.
- All staff are instructed to report any concern/disclosure or any form of alleged abuse to the Head of Safeguarding / Trust's Safeguarding Officer within two hours.
- Staff and volunteers are required to sign a self-declaration form annually.
- All staff and volunteers receive any support they may need.

Policies and Procedures:

By providing a range of policies, procedures and guidance for staff and volunteers, which are kept updated, easily accessible and operates in conjunction with this policy. These Policies include:

- Anti-Bullying
- Code of Conduct
- Complaint’s policy
- Data and Cyber-security Breach Prevention and Management Plan
- Data Protection and Confidentiality Policy
- Health and Safety
- LAC Policy
- Online Safety Policy
- Peer- on- Peer Abuse Policy
- Racism, Equality and Diversity
- Recruitment
- Safeguarding and Child Protection Policies including reporting poor practice
- Safeguarding and Protecting Adults at risk
- Safer Recruitment Policy
- Staff Self-Declaration
- Whistleblowing Policy

N.B. All these policies are available to staff on the Club’s T Drive/ Trust’s M: Drive, or by contacting the Safeguarding Team.

- **Training:** By ensuring that staff and volunteers are provided with regular training and undertake the EFL Safeguarding and FA Safeguarding online training.
- **Information:** By ensuring that children, young people, adults at risk and their parents/carers are always listened to have access to information as to where to get help should they have concerns. We do this via leaflets, contact cards, display posters and the Club’s/Trust’s website.

5. Acronyms

This policy contains a number of acronyms used in the within the safeguarding, sporting and community sector. These acronyms are listed below alongside their descriptions.

Acronym	Long form	Description
CCE	Child Criminal Exploitation	A form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity in exchange for something the victim needs or wants, for the financial advantage or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
CEO	Chief Executive Officer	A high–ranking executive of a firm and make major corporate decisions.
CCO	Club Community Organisation	An independent charity linked with the local football Club in Tigers Trust case this is Hull City Tigers Football Club.
CSCS	Children’s Social Care Services	The branch of the Local Authority that deals with children’s social care.

CSE	Child Sexual Exploitation	A form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, for the financial advantage, increased status or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
DBS	Disclosure and Barring Service	The service that performs the statutory check of criminal records for anyone working or volunteering in a community setting.
DPO	Data Protection Officer	The appointed person within the CCO who has responsibility for overseeing data protection strategy and implementation to ensure compliance with the UK GDPR and Data Protection Act.
DSO	Designated safeguarding Officer	A member of the senior leadership team who has lead responsibility for safeguarding and child protection throughout the Tigers Trust/ Academy / Club.
FGM	Female Genital Mutilation	All procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.
UK GDPR	UK General Data Protection Regulation	Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent.
HBA	'Honour-Based' Abuse	So-called 'honour-based' abuse involves crimes that have been committed to defend the honour of the family and/or community.
IICSA	Independent Inquiry into Child Sexual Abuse	The Independent Inquiry into Child Sexual Abuse is analysing case files from the Disclosure and Barring Service to learn more about the behaviours of perpetrators who have sexually abused children in institutions, and to understand institutional responses to these behaviours.
KCSIE	Keeping Children Safe in Education	Statutory guidance setting out schools and colleges' duties to safeguard and promote the welfare of children.
LA	Local Authority	A local government agency responsible for the provision of a range of services in a specified local area, including education.
LAC	Looked After Children	Children who have been placed in local authority care or where children's services have looked after children for more than a period of 24 hours.
LGBTQ+	Lesbian, Gay, Bisexual, Transgender, Queer (or Questioning), Ace plus	Term relating to a community of people, protected by the Equality Act 2010, who identify as lesbian, gay, bisexual, or transgender, or other protected sexual or gender identities.
NSPCC	The Society for the Prevention of Cruelty to Children	The National Society for the Prevention of Cruelty to Children is a British child protection charity.
PLAC	Previously looked-after children	Children who were previously in local authority care or were looked after by children's services for more than a period of 24 hours. Are also known as care leavers.
PSHE	Personal, social and health education	A non-statutory subject in which participants learn about themselves, other people, rights, responsibilities, and relationships.

PHE	Public Health England	An executive agency of the Department of Health and Social Care which aims to protect and improve the nation's health and wellbeing.
SCR	Single Central Record	A statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and instructors, and volunteers who attend the Academy/Tigers Trust in a non-visitor capacity.
SEND	Special Educational Needs or Disabilities	A child or young person has special educational needs and disabilities if they have a learning difficulty and/or a disability that means they need special health and education support, we shorten this to SEND.
SLT	Senior Leadership Team	Staff members who have been delegated leadership responsibilities in Club/Tigers Trust.
VEMT	Vulnerable, Exploited, Missing and Trafficked	Work closely with partners to support and safeguard young people at risk of exploitation.

6. Definitions

The terms **“children”** and **“child”** refer to anyone under the age of 18.

For the purposes of this policy, **“safeguarding children and adults at risk”** is defined as:

- Protecting children and adults from maltreatment.
- Preventing the impairment of children and adults mental and physical health or development.
- Ensuring that children and adults grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children and adults at risk to have the best outcomes.

For the purposes of this policy, **“consent”** is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity and has the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16.

The Department of Health defines an adult at risk as a person aged 18 or over who may need community care services because of a disability (mental or other), age, or illness.

A person is also considered vulnerable if they are unable to look after themselves, protect themselves from harm or exploitation or are unable to report abuse.

For the purposes of this policy, **“sexual violence”** refers to the following offences as defined under the Sexual Offences Act 2003:

- **Rape:** A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus, or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Assault by penetration:** A person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.

- **Sexual assault:** A person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.
- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

For the purposes of this policy, **“sexual harassment”** refers to unwanted conduct of a sexual nature that occurs online or offline, inside, or outside of Club/Tigers Trust provision. Sexual harassment is likely to violate a person’s dignity, make them feel intimidated, degraded, or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence.

Sexual harassment can include, but is not limited to:

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual “jokes” and taunting.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone’s clothes, and displaying images of a sexual nature.
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:
 - The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
 - Sharing unwanted explicit content.
 - Upskirting.
 - Sexualised online bullying.
 - Unwanted sexual comments and messages, including on social media.
 - Sexual exploitation, coercion, and threats.

For the purposes of this policy, **“upskirting”** refers to the act, as identified in the Voyeurism (Offences) Act 2019, of taking a picture or video under another person’s clothing, without their knowledge or consent, with the intention of viewing that person’s genitals or buttocks, with or without clothing, to obtain sexual gratification, or cause the victim humiliation, distress, or alarm. Upskirting is a criminal offence. Anyone, including participants and staff, of any gender can be a victim of upskirting.

For the purposes of this policy, the **“consensual and non-consensual sharing of nude and semi-nude images and/or videos”**, colloquially known as **“sexting”**, is defined as the sharing between participants of sexually explicit content, including indecent imagery.

For the purposes of this policy, **“indecent imagery”** is defined as an image which meets one or more of the following criteria:

- Nude or semi-nude sexual posing
- A child touching themselves in a sexual way
- Any sexual activity involving a child
- Someone hurting a child sexually
- Sexual activity that involves animals

7. Expectations when dealing with Children, Young People, or Adults at Risk.

- Create a positive environment that promotes football and other activities as healthy, enjoyable, and life-enhancing experience where children, young people and adults at risk are listened to, their views taken into account and where they can be confident that any concerns they have are listened to and taken seriously.
- Identify children, young people or adults at risk who may be at risk.
- Be aware of whom the Head of Safeguarding, DSO and the CEO are and their role in safeguarding.
- Undertake any safeguarding training, this includes face to face and online training – including the induction process (training is regularly updated so you may be required to attend additional training, you may also have to attend additional training dependant on your role).
- Any updates to safeguarding training and policies to be circulated via email at least annually.
- Report any concern to the Head of Safeguarding/ DSO (further details on reporting can be found in the [reporting](#) section of this policy)
- Treat everyone with respect, setting a positive example for others.
- Respect personal space and privacy.
- Ensure where possible another adult is present or within sight or hearing of an activity or interaction with a child/young person or adult at risk.
- Make sure that your actions cannot be misinterpreted by someone else.
- Challenge unacceptable behaviour including anything that breaches the Club's or Trust's stance on Equality.
- Consider at all times what is the best interested of the child, young person, adult at risk or yourself and never put a child, young person, adult at risk or yourself in a vulnerable or compromising situation.
- Do not have inappropriate physical, verbal, or social media contact with others.
- Do not keep allegations or suspected abuse to yourself, you must report them to the Head of Safeguarding/ Trust DSO.
- Do not keep poor practice to yourself, you must report this to the Head of Safeguarding/ Trust DSO.

8. Safeguarding Children and Young People under 18 years of age

Hull City Tigers and Tigers Trust endorse the following statement:

Every child or young person, defined as any person under the age of 18 (Children Act 1989), who plays or participates in football 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 football. Football recognises its responsibility to safeguard the welfare of all children and young people by seeking to protect them from physical, sexual or emotional harm and from neglect or bullying. All children and young people have the right to be safe, valued and listen to.

(FA Affiliated Safeguarding Policy)

Key Principles

- The child's welfare is, and must always be, the paramount consideration.
- All children have a right to be protected from abuse regardless of their age, gender, disability, culture, language, racial origin, religious beliefs, or sexual orientation.
- All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately.
- Working in partnership with other organisations, children and young people and their parents and carers is essential.

9. Safeguarding Adults at Risk:

Hull City Tigers and Tigers Trust are committed to ensuring the safety and welfare of adults at risk and to maximise their participation and enjoyment of activities in a safe and caring environment.

Definitions of an Adults at risk: (Care Act 2014)

Someone who is aged 18 or over and who is, or may be, in need of community care services by reason of mental or other disability, age or illness and who is, or may be, unable to protect himself/herself from significant harm or exploitation.

Hull City and Tigers Trust also applies this policy to those not receiving community care services but are considered to be vulnerable to abuse.

10. Participants with SEND

When managing safeguarding in relation to participants with SEND, staff will be aware of the following:

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the participants disability without further exploration; however, it should never be assumed that a participants indicators relate only to their disability
- Participants with SEND can be disproportionately impacted by issues such as bullying, without outwardly showing any signs
- Communication barriers may exist, as well as difficulties in overcoming these barriers

When reporting concerns or making referrals for participants with SEND, the above factors will always be taken into consideration. When managing a safeguarding issue relating to a participant with SEND, the Head of Safeguarding/DSO will liaise with the participants parents where appropriate, to ensure that the participant's needs are met effectively.

Disabled Children

Research tells us that disabled children are more vulnerable to abuse than non-disabled children. Staff and volunteers must be aware that the belief that disabled children are not abused or that minimise the impact of abuse, may lead to the denial of, or failure to report abuse and neglect. Disabled children at risk or who have experienced abuse should be treated with the same degree of concern as accorded to non-disabled children. Concerns regarding disabled children must be reported to the Head of Safeguarding/ Trust DSO.

N.B if a Local Authority considers that a parent/carer of a disabled child has support needs they must carry out an assessment. For further guidance see the SEN Code of Practice 2015.

11. LAC and PLAC

Children most commonly become looked after because of abuse and/or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. PLAC, also known as care experienced, can also remain vulnerable after leaving care.

Hull City and Tigers Trust will ensure that staff have the skills, knowledge and understanding to keep LAC and PLAC safe. This includes ensuring that the appropriate staff have the information they need, such as:

- Looked after legal status, i.e., whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order.
- Contact arrangements with parents or those with parental responsibility.
- Care arrangements and the levels of authority delegated to the carer by the authority looking after the participant.

The Head of Safeguarding/ DSO will be provided with the necessary details of individual's social workers and the VSH, and, for PLAC, personal advisers.

12. Definitions of Abuse:

Abuse is defined as a form of maltreatment of child, young person, or adult at risk which involves inflicting harm or failing to act to prevent harm. A child, young person, or adult at risk may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the internet. Abuse can take place online, or technology may be used to facilitate offline abuse. Children, young people, or adults at risk may be abused by one or multiple children, young people or adults.

All staff will receive the correct training to enable them to be aware of the indicators of abuse and neglect. Abuse and neglect are rarely standalone events and can often overlap one another, therefore staff will be vigilant and always raise concerns or speak with the Head of Safeguarding / Trust DSO or the CEO if they are unsure. Staff also are aware that many factors can occur outside of the Club /Tigers Trust activity, this includes the risk of CCE, CSE outside of their family home.

Definition of significant harm:

Ill treatment, including sexual abuse and forms of ill treatment that are not physical, the impairment of, or an avoidable deterioration in, physical or mental health and the impairment of physical, emotional, social, or behavioural development.

13. Child and Adults potential warning signs:

Type of Abuse	Definition	Warning signs
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Physical Abuse	A form of abuse which may involve actions such as hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating, or otherwise causing physical harm to a child, young person, or adult at risk. Physical abuse can also be caused by one or multiple adults or other children or young people.	Warning indicators can include repeat or multiple bruising, an explanation which is not consistent with the injury, several different explanations for the injury, unexplained delay in seeking treatment and reluctance to give information.
Neglect/Acts of Omission	The persistent failure to meet a child, young person, or adult at risk basic physical and/or psychological needs, likely to result in serious impairment of a child, young person, or adults at risk's health or development. This may involve a parent or carer failing to provide adequate food, clothing, or shelter. Failing to protect a child, young person, or adult at risk from physical and emotional harm or danger, failure to access appropriate medical care or treatment, or to meet basic emotional needs. If the child is also not protected from harm or left with adults intoxicated and violent, is abandoned or excluded from their home. It may involve failing to ensure that a child/young person at risk are safe and adequately supervised.	Warning indicators can include unkempt appearance, stealing food/money, infrequent school attendance or weight loss.
Sexual Abuse	<p>Abuse that involves forcing or enticing a child, young person, or adult at risk to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching the outside of clothing. It may also include non-contact activities, such as involving children, young people, or adults at risk in looking at, or in the production of, sexual images, encouraging children, young people, or adults at risk to behave in sexually inappropriate ways, or grooming a child, young person, or adult at risk in planning for abuse. Sexual abuse can be perpetrated by people of any gender, age, or ethnic community.</p> <p>Grooming is defined as developing the trust of an individual and /or their family for the purpose of sexual abuse, sexual exploitation, or trafficking. Whilst legally children aged sixteen have reached the age of consent for sexual activity, it is unacceptable for any member of staff to abuse their relationship of trust for sexual gratification.</p>	Recognition of sexual abuse can be difficult unless a child discloses. Warning indicators are likely to be emotional and behavioural, you should always seek further advice from the Head of Safeguarding/ Trust DSO.

<p>Domestic Abuse</p>	<p>Abusive behaviour of a person towards another person (including conduct directed at someone else, e.g., the person's child) where both are aged 16 or over and are personally connected. Abusive behaviour includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse.</p> <p>Personally connected includes people who:</p> <ul style="list-style-type: none"> Are, have been, or have agreed to be married to each other. Are, have been, or have agreed to be in a civil partnership with each other. Are, or have been, in an intimate personal relationship with each other. Each have, or had, a parental relationship towards the same child. Are relatives. 	<p>Signs are not always as obvious as you might think. That's because domestic abuse is about controlling someone's mind and emotions as much as hurting their body.</p> <p>If someone is being physically abused, they will likely have frequent bruises or physical injuries and likely have a weak or inconsistent explanation for these injuries. It is also common for someone to try to cover up the physical signs with clothing, make up and sunglasses.</p> <p>Domestic abuse, can take a serious emotional toll, creating a sense of helplessness, hopelessness, or despair, or cause people to believe that they will never escape the control of the abuser. They may also exhibit a constant state of alertness to the point they never can completely relax. Other emotional signs of abuse include: Agitation, anxiety, or constant apprehension, changes in sleep habits, extremely apologetic or meek, low self-esteem, seeming fearful, experiencing symptoms of depression.</p>
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Psychological or emotional	Is defined as the persistent emotional maltreatment of a child, young person, or adult at risk causing severe, and adverse effects on their emotional development and wellbeing. This may involve conveying that they are worthless, unloved, and inadequate. It may include not giving the child, young person, or adult at risk the opportunities to express their views, to deliberately silencing or belittle them. This may involve seeing or hearing the ill-treatment of another, serious bullying, and exploitation. Some levels of emotional abuse are involved in all types of maltreatment of a child, young person, or adult at risk, but it could also occur	Often associated with other forms of abuse and can also include, abnormal attachment between child and parent, not wanting to go home or go to training/school, scapegoating within the family, low self-esteem and confidence, being withdrawn or seen as a loner and having difficulties relating to others.
Financial/Material	Taking or misusing someone else's money or belongings to their own gain, harming, depriving, or disadvantaging the victim, controlling someone's purchases or access to money, and doesn't always involve a crime like theft or fraud, it can also often involve other forms of abuse.	Include things such as Borrowing money and not giving it back, stealing money or belongings, taking pension payment or other benefits away from an individual. Taking money as payment for coming to visit or to spend time with an individual, forcing someone to sell their home or assets without consent Tricking someone into bad investments, changing their will, property, or inheritance.

14. Exploitation:

County lines and Child Criminal Exploitation (CCE)

Refers to gangs and organised criminal networks exploiting children to move, store or sell drugs and money into one or more areas, locally and/or across the UK.

As well as the general indicators for CCE, Hull City Tigers and Tigers Trust staff will be aware of the specific indicators that a child, or young person may be involved in county lines, including:

Going missing and subsequently being found in areas away from their home.

- Having been the victim or perpetrator of serious violence, e.g., knife crime.
- Receiving requests for drugs via a phone line.
- Moving drugs.
- Handing over and collecting money for drugs.

- Being exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection.
- Being found in accommodation they have no connection with or a hotel room where there is drug activity.
- Owing a ‘debt bond’ to their exploiters.
- Having their bank account used to facilitate drug dealing.
- The Head of Safeguarding/ Trust’s DSO will consider supporting the Local Authority with a referral to the National Referral Mechanism on a case-by-case basis working with Hull City Council’s VEMT.

Child sexual exploitation (CSE)

For the purposes of this policy, “child sexual exploitation” is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage, increased status or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

Hull City and the Tigers Trust will recognise that CSE can occur over time or be a one-off occurrence and may happen without the child or young person’s immediate knowledge, e.g. through others sharing videos or images of them on social media. Hull City and the Tigers Trust will recognise that CSE can affect any child or young person who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes participants aged 16 and above who can legally consent to sexual activity. The Hull City and the Tigers Trust will also recognise that participants may not realise they are being exploited e.g., they believe they are in a genuine romantic relationship.

Hull City and Tigers Trust staff will be aware of the key indicators that a participant is the victim of CSE, including:

- Appearing with unexplained gifts, money, or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly missing school or education or not taking part.
- Having older boyfriends or girlfriends.
- Suffering from sexually transmitted infections.
- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.

Where CSE, or the risk of it, is suspected, staff will discuss the case with the Head of Safeguarding/ Trust DSO. If after discussion a concern remains, local safeguarding procedures will be triggered, including referral to the LA. The LA and all other necessary authorities will then handle the matter to conclusion. The Tigers Trust will cooperate as needed.

15. Peer on Peer Abuse:

Is defined as abuse between children, young people, and adults at risk.

The Club and Tigers Trust has a zero-tolerance approach to abuse, including peer-on-peer abuse.

All staff will be aware that peer-on-peer abuse can occur between participants of any age and gender, both inside and outside of Academy/ Tigers Trust provision, as well as online. All staff will be aware of the indicators of peer-on-peer abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that peer-on-peer abuse is not occurring. All staff will speak to the Head of Safeguarding / Trust DSO if they have any concerns about peer-on-peer abuse.

All staff will understand the importance of challenge inappropriate behaviour between peers and will not tolerate abuse as “banter” or “part of growing up”.

Peer-on-peer abuse can be manifested in many different ways, including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers.
- Physical abuse – this may include an online element which facilitates, threatens and/or encourages physical abuse.
- Sexual violence – this may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Upskirting.
- Initiation- and hazing-type violence and rituals, which can include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element.

If a child/participant makes an allegation of abuse against another child/participant:

- You must tell the Head of Safeguarding/ Trust DSO and record the allegation, but do not investigate it;
- The head of Safeguarding/DSO will contact the local authority children’s social care team and follow its advice, as well as the Police if the allegation involves a potential criminal offence;
- The Head of Safeguarding/DSO will put a risk assessment and support plan into place for all children involved – both the victim(s) and the child(ren) against whom the allegation has been made – with a named person they can talk to if needed; the wellbeing of all children involved is essential and the Head of Safeguarding/ Trust DSO will contact specialist mental health services, if appropriate.
- We will not minimise the risk of peer-on-peer/child on child abuse by: challenging any form of derogatory or sexualised language or behaviour; being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female

participants, and initiation or hazing 20 type violence with respect to boys; ensuring our curriculum helps to educate participants about appropriate behaviour and consent; ensuring participants know they can talk to staff confidentially.

- All staff will be clear as to the Club's/Tigers Trust policy and procedures regarding peer-on-peer abuse and the role they have to play in preventing it and responding where they believe a child may be at risk from it.
- All staff will be made aware of the heightened vulnerability of children/participants with SEND, who evidence suggests are more likely to be abused than their peers. Staff will not assume that possible indicators of abuse relate to the participants SEND and will always explore indicators further.
- All staff will be made aware of the heightened vulnerability of LGBTQ+ Participants, who evidence suggests are also more likely to be targeted by their peers. In some cases, participants who are perceived to be LGBTQ+, regardless of whether they are LGBTQ+, can be just as vulnerable to abuse as LGBTQ+ participants. The Club and Tigers Trust response to sexual violence and sexual harassment between participants of the same sex will be equally as robust as it is for incidents between children of the opposite sex.
- Participants will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Participants will also be reassured that they will be taken seriously, be supported, and kept safe.

Discriminatory Abuse:

- When a person feels harassed or picked on/ targeted because of who they are. This includes comments or jokes which are, racist, sexist, homophobic, ageist or based on the person's disability.

16. Bullying

- Persistent or repeated hostile and intimidating behaviour towards a child or young person to make them feel uncomfortable or unsafe, for example name calling, exclusion or isolation, spreading rumours, embarrassing someone in public or in front of their peers, threatening to cause harm or damaging their possessions. Including cyber bullying (via mobile phones or social networking sites).
- Hull City has a detailed policy on bullying which is available on the intranet for staff or by contacting the Safeguarding Team. Children and young people are activity encouraged to talk to staff and/or the Safeguarding Manager if there are any concerns or issues around bullying.

N.B. Tigers Trust has a detailed policy on Bullying which is available on the M: Drive for staff or by contacting the Trust's Safeguarding Officer.

17. The Prevent Duty

The Government's PREVENT duty came into force on the 1st July 2015 and involves protecting children from the risk of radicalisation. Key Club/ Trust staff will be trained, informed and able to recognise vulnerability and mitigate the risks. Currently there a number of factors that can make young people vulnerable to radicalisation and if there are any such concerns about a child or young person the Head of Safeguarding Caroline Adamson must be notified immediately.

Hull City Tigers and Trust will not tolerate activity of any sort which creates an environment for the radicalisation of individuals regardless of which extremist ideology it is based upon.

18. Extremism

Extremism goes beyond terrorism and includes people who target the vulnerable, including children and young people by seeking to sow division between communities on the basis of race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in our society. Extremism is defined in the Counter Terrorism and Security Act 2015, as the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. We also regard calls for the death of members of our armed forces as extremist.

19. Radicalisation

Is defined as to the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs. Extremism also includes calling for the death of members of the armed forces.

For the purposes of this policy, “**radicalisation**” refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

For the purposes of this policy, “**terrorism**” refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public and be made for the purpose of advancing a political, religious, or ideological cause.

Protecting children, young people, and adults at risk from the risk of radicalisation is part of the Club’s and Trust’s wider safeguarding duties. The Tigers Trust will actively assess the risk of participants being radicalised and drawn into extremism and/or terrorism. Staff will be alerted to changes in participants’ behaviour which could indicate that they may need help or protection. Staff will use their professional judgement to identify participants who may be at risk of radicalisation and act appropriately, which may include contacting the DSO or making a Prevent referral. The Tigers Trust will work with local safeguarding arrangements as appropriate.

Hull City and the Tigers Trust will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the Club/Tigers Trust will assist and advise family members who raise concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the child’s parents, unless Hull City and the Tigers Trust has reason to believe that the child would be placed at risk as a result.

The Head of Safeguarding/DSO will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect participants against the risk of radicalisation. The Head of Safeguarding/ DSO will hold formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

20. Serious Violence

Serious Violence has now been added as a specific safeguarding issue in response to the increase in knife crime and children/ young people’s potential involvement in criminal networks or gangs.

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, or provision, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

What is serious violence?

The Serious Violence Strategy, which was introduced by the government in 2018, identifies offences such as homicides and knife and gun crime as key factors which account for around one percent of all recorded crime. The impact of serious violent crime on individuals and the community is significant.

The main areas that the Serious Violence Strategy focuses on are:

- Tackling county lines
- Early intervention and prevention
- Supporting communities and local partnerships
- Effective law enforcement and the criminal justice response.

Indicators may include, but are not limited to:

- Increased absence from school, or provision
- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.
- A significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

Staff will be made aware of some of the most significant risk factors that could increase a participant's vulnerability to becoming involved in serious violence. These risk factors include, but are not limited to:

- Being male.
- Having been frequently absent from school.
- Having been permanently excluded from school.
- Having experienced child maltreatment.
- Having been involved in offending, such as theft or robbery.

Staff members who suspect a participant may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the Head of Safeguarding/DSO.

21. Modern Slavery and Human Trafficking

Encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation. Concerns about this must, in the first instance, be reported to the Head of Safeguarding/ Trust DSO who will immediately refer it to the National Referral Mechanism.

22. Hazing

Hazing is the practice of rituals and other activities involving harassment, abuse or humiliation used as a way of initiating a person into a group e.g. gangs, sports teams, schools, military units etc.

23. Female Genital Mutilation (FGM)

Is defined as all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

All staff will be alert to the possibility of a participant being at risk of FGM, or already having suffered FGM. If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with CSCS and/or the police. The Tigers Trust procedures relating to managing cases of FGM and protecting children and young people will reflect multi-agency working arrangements.

All staff will be aware of the indicators that participants may be at risk of FGM. While some individual indicators they may not indicate risk, the presence of two or more indicators could signal a risk to the participant. It is important to note that the child/ young person may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that a child or young person may be at heightened risk of undergoing FGM include:

- The socio-economic position of the family and their level of integration into UK society.
- The participant coming from a community known to adopt FGM.
- Any girl with a mother or sister who has been subjected to FGM.
- Any girl withdrawn from PSHE.

Indicators that FGM may take place soon include:

- When a female family elder is visiting from a country of origin.
- A girl confiding that she is to have a 'special procedure' or a ceremony to 'become a woman'.
- A girl requesting help from a teacher if she is aware or suspects that she is at immediate risk.
- A girl, or her family member, talking about a long holiday to her country of origin or another country where FGM is prevalent.

All staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin. Indicators that FGM may have already taken place include the child or young person:

- Having difficulty walking, sitting, or standing.
- Spending longer than normal in the bathroom or toilet.
- Spending long periods of time away from sessions during the day with bladder or menstrual problems.
- Having prolonged or repeated absences from school, followed by withdrawal or depression.
- Being reluctant to undergo normal medical examinations.

- Asking for help, but not being explicit about the problem due to embarrassment or fear.

24. Forced Marriage

Is defined as a marriage that is entered into without the full and free consent of one or both parties, and where violence, threats or any other form of coercion is used to cause a person to enter into the marriage. Threats can be physical, emotional, or psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent, e.g. due to some forms of SEND. Forced marriage is a crime in the UK and a form of HBA.

All staff will be alert to the indicators that a participant is at risk of, or has undergone, forced marriage, including, but not limited to, the participant:

- Becoming anxious, depressed, and emotionally withdrawn with low self-esteem.
- Showing signs of mental health disorders and behaviours such as self-harm or anorexia.
- Displaying a sudden decline in their educational performance, aspirations, or motivation.
- Regularly being absent from school.
- Displaying a decline in punctuality.
- An obvious family history of older siblings leaving education early and marrying early.

Staff who have any concerns regarding a child, young person or adult at risk who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the Head of Safeguarding/ DSO and local safeguarding procedures will be followed – this could include referral to CSCS, the police or the Forced Marriage Unit.

25. Mental health

All staff will be made aware that mental health problems can, in some cases, be an indicator that a participant has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Staff will not attempt to make a diagnosis of mental health problems – the Club and Tigers Trust will ensure this is done by a trained mental health professional. Staff will, however, be encouraged to identify participants whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one. Staff will also be aware of how participant's experiences can impact on their mental health, and behaviour.

Staff who have a mental health concern about a child/ young person/ adult at risk, that is also a safeguarding concern will act in line with this policy and speak to the Head of Safeguarding/ Club DSO or the CEO.

The Club/ Tigers Trust will access a range of advice to help them identify participant in need of additional mental health support, including working with external agencies. The Club also has a Mental Health and Emotional Wellbeing policy/ plan.

26. Online safety and personal electronic devices

Through training, all staff members will be made aware of:

- Participant's attitudes and behaviours which may indicate they are at risk of potential harm online.
- The procedure to follow when they have a concern regarding a participant's online activity.

27. Upskirting

Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment for the purpose of upskirting. **“Operating equipment”** includes enabling, or securing, activation by another person without that person’s knowledge, e.g. a motion-activated camera.

Upskirting will not be tolerated by Hull City and the Tigers Trust. Any incidents of upskirting will be reported to the Head of Safeguarding/ Trust DSO, who will then decide on the next steps to take, which may include police involvement.

28. Sexting and the sharing of indecent images

Staff will be aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that children/ Young people are not unnecessarily criminalised.

Where a member of staff becomes aware of an incidence of sexting that involves indecent images of a participant, they will refer this to the Head of Safeguarding/ Trust DSO as soon as possible. Where a participant confides in a staff member about the circulation of indecent imagery, depicting them or someone else, the staff member will:

- Refrain from viewing, copy, and printing, sharing, storing, or saving the imagery.
- Tell the Head of safeguarding/DSO immediately if they accidentally view an indecent image and seek support.
- Explain to the Child/ young person that the incident will need to be reported.
- Respond positively to the child/ young person without blaming or shaming anyone involved and reassuring them that they can receive support from the Head of Safeguarding/ Trust DSO.
- Report the incident to the DSO.

The Head of Safeguarding/ Trust DSO will attempt to understand what the image contains **without viewing it** and the context surrounding its creation and distribution.

29. Context of safeguarding incidents

Safeguarding incidents can occur outside of Hull City and Tigers Trust provision and can be associated with outside factors. All staff, particularly the DSO, CEO or Head of Safeguarding, will always consider the context of safeguarding incidents. Assessment of children and young people’s behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare. The school will provide as much contextual information as possible when making referrals to CSCS.

30. Homelessness:

The Head of Safeguarding, Trust DSO, /CEO are aware of the contact details and referral routes into the Local Housing Authority to ensure that concerns over homelessness can be raised as early as possible.

Indicators that a family may be at risk of homelessness include:

Household debt, rent arrears, domestic abuse, anti-social behaviour, any mention of a family moving home because “they have to”.

31. Work experience

When a participant is completing their work experience, Hull City and the Tigers Trust will ensure that the participant is with a minimum of one member of staff at all times.

32. Transporting Participants at Trust only

Consent and Safeguarding for the Trust (TRUST ONLY)

- A risk assessment is carried out with input from the DSO, CEO and Health and Safety Officer before the journey
- Parental consent is required in writing for participants to be carried in a staff members' or hired vehicles.
- The lead member of staff in charge ensures that permission has been obtained from all parents and ensures that all parties are fully informed of the transport arrangements to and from events.
- Drivers are NOT allowed to be alone with participants. This is to ensure a safe journey.
- Only drivers with a DBS are permitted to transport participants. All staff will have business insurance in place before the journey takes place.
- The designated staff member will carry a mobile phone with them in case of an emergency.
- The Tigers Trust must check that the car is suitable and safe to transport participants. Recent MOT, seatbelt check etc.

N.B For transport Policy in respect of the Club/Academy please see separate transport policy on the Club's T drive and also included in staff introduction. Staff are not allowed to transport any Academy players – please see policy for further details.

33. Multi-agency working

Hull City and the Tigers Trust contributes to multi-agency working as part of safeguarding children, young people, and adults at risk.

Hull City and the Tigers Trust will be fully engaged, involved, and included in local safeguarding arrangements when it is named as a relevant agency by local safeguarding partners such as CSCS, the Police, health services and any other services to protect the welfare of children, young people, and adults at risk.

Hull City and the Tigers Trust also recognises the importance of inter-agency working in identifying and preventing CCE and CSE.

34. Information sharing:

Hull City and the Tigers Trust recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet the needs of children, young people, and adults at risk. Also identifying any need for early help.

Whilst considering the above, staff will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on the Club and Tigers Trust to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes, and data protection regulations do not act as a barrier to sharing information where failure to do so would result in the child, young person or adult at risk being placed at risk.

Staff members are encouraged that the sharing of information does not stand in the way of their responsibility to promote the welfare and safety of children, young people, and adults at risk. If any staff members are in doubt about the sharing of information, they can speak to the Head of Safeguarding, Trust DSO, or CEO.

35. Early Help

Early help means providing support as soon as a problem emerges, at any point in a child, young person (up to the age of 24 where the child or young person has a disability). The Club and Trust work in partnership with the Local Authority's Early Help Team.

36. Poor Practice

Poor practice which is allowed to continue can cause harm and can become abuse. Poor practice is unacceptable and can include the following and will be treated seriously with appropriate action. Action include referral to the FA and EFL. The incidents reported to the FA will result in a safeguarding investigation undertaken by the FA.

- When insufficient care is taken to avoid injuries (e.g. by excessive training or inappropriate training for the age, maturity, experience and ability of players/participants).
- Allowing abusive or concerning practices to go unreported (e.g. a coach who ridicules and criticises participants/players who make a mistake during a session).
- Allowing hazing practices to go unreported.
- Placing children, young people and adults at risk in potentially compromising and uncomfortable situations with other peers or adults (e.g. inappropriate use by a staff member of social media with a child, young person or adult at risk).
- Ignoring health and safety guidelines (e.g. allowing young players to set up equipment, such as goal posts, unsupervised by adults)
- Failing to abide by the Club's /Trust's Code of Conduct.

37. Dealing with a Disclosure

- Be aware of any safeguarding issues that can put children, young people, and Adults at risk at risk.
- Be aware of behaviours which are linked to alcohol and substance misuse, sharing indecent images, a sudden change in behaviour and any other signs which indicate the potential risk of harm.
- Stay calm and do not appear to be shocked.
- Listen carefully to what they have to say but do not ask leading questions or investigate.
- Remember as much details as you can.
- Do not promise you can keep what they say confidential, tell them it will need to be shared.
- Offer reassurance that they have done the right thing by telling you.
- Reassure them that they are not to blame, and this **is not their fault**.
- Explain to them what you are going to do and that they will be told what is happening.

- Preserve any evidence where possible.
- Be aware that in certain circumstances medical evidence may be needed.
- Do not rush them into making a decision.
- Inform the Head of Safeguarding / Trust DSO, in the first instance (within two hours) (with their permission). Who will deal with it and liaise with the appropriate authorities including the LA, EFL and FA.
- Write down as much information as you can as soon as is reasonably possible. Recording exactly what was said by the child/young person, in their own words.
- Record dates, events, and times when you were told and then sign and keep a copy.
- If the person is injured or in danger take immediate action e.g., dial 999 for the Police or ambulance.
- Only involve those who need to know.
- Use the Club's safeguarding recording system my concern, or the Trust incident report form the DSO will then log this on **My Concern**.
- If it is a non-emergency situation discuss the person's wishes and establish who they would like you to contact.
- **Report the incident immediately (within two hours) to the Head of Safeguarding/Trust's Safeguarding Officer, who will deal with it and liaise with the appropriate authorities including LA, The FA/English Football League.**

N.B. The Trust's Safeguarding Officer and staff and volunteers who work directly with children and young people receive detailed guidance and training on recognising concerns and acting upon them.

In addition to this **we take poor practice very seriously** and where there have been three incidents of poor practice by the same individual, this will be referred to the **FA Safeguarding Team**.

Safeguarding Officers, staff and volunteers who work directly with children and young people receive detailed guidance and training on recognising concerns and acting upon them.

N.B. It is important to be aware the person being abused may not be aware it is abuse. Also, they may decide to disclose the abuse a long time after it happened. It is always important to show you are taking seriously what they are saying.

38. Reporting Concerns in respect of Adult's at risk

Reporting such matters to agencies outside Hull City Tigers and Tigers Trust will take into account the balance which needs to be maintained for the confidentiality of the vulnerable person's affairs, the vulnerable person's capacity to consent to the matter being taken further and the duty of care to report suspected abuse. **The Head of Safeguarding and Trust's DSO's role encompasses the role of Adults at risk Safeguarding Officer.**

The Head of Safeguarding/ Trust's DSO will assess the allegations/suspicious, and in some cases seek advice from the Hull & East Riding Safeguarding Adults Partnership before deciding on the appropriate action to be taken.

If the incident is not considered to fit the criteria of abuse the Adult at risk Services Officer can deal with the situation directly.

In all cases, **Head of Safeguarding/ Trust's DSO** is responsible for maintaining complete records of the allegations made, including dates, times and persons involved and actions taken.

This action may be of two types:

Corrective action – action to be taken against alleged or confirmed perpetrators (as set out in the disciplinary procedure) involved in incidents of abuse, and the discreet and sensitive handling of the abused person.

Preventive action – identifying strategies to be implemented, with the objective of halting further abuse and/or, limiting the opportunities for potentially abusive practices.

N.B. A more detailed policy and procedure is available to staff working directly with Adults at risk on the M: Drive, or from the Trust's Safeguarding Officer.

Acting on all concerns

No member of staff should assume that someone else will pass on information which they think may be critical to keeping a child safe. If a member of staff has concerns about a child's welfare and believes they are suffering or likely to suffer harm, then they should immediately share the information with the Head of Safeguarding who will liaise with Local Authority Children's Social Care. (Working Together 2018). This also needs to be recorded on **My Concern**. If a child is at risk of immediate harm the Police should be contacted firstly.

39. Managing referrals

The Head of Safeguarding, Trust's DSO, and CEO will be aware of the LA's arrangements in place for managing referrals. The DSO will provide staff members with clarity and support where needed. When making a referral to CSCS or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.

The Head of Safeguarding and Trust DSO will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the children, young people and adults at risk involved. The Head of Safeguarding/ DSO will work closely with the police to ensure that we do not jeopardise any criminal proceedings, and to obtain help and support as necessary.

EHASH Referral

All telephone referrals should be followed, within 24 hours by written referral giving specific and detailed information. This is done through the safeguarding EHASH portal.

Contact details;

Email - ehash@hullcc.gov.uk

Phone – 01482 448879

40. Position of Trust:

Position of trust is a legal term that refers to certain roles and settings where an adult has regular and direct contact with children. It is illegal for those in a position of trust to engage in sexual activity with a child in their care, even if that child is above the age of consent (16 or 17) (sexual Offences Act 2003) In 2022, following the NSPCC close the loophole campaign, the Sexual Offences Act 2003 was amended to expand position of trust roles, including Sport Coaches.

Although most people who work with children and young people have their best interests at heart, all organisations that work with children have a responsibility to prevent anyone who is in a position of authority from abusing a child.

Indicators of situations that may cause concern that a member of staff or volunteer may be abusing their position to abuse children:

- Giving a child or young person extra special attention or preferential treatment, or acting as their confidante
- Frequently spending time on their own with a child or young person, particularly if this is in private or isolated areas
- Spending time outside their working or volunteering hours alone with a child or young person
- Transporting a child or young person to or from meetings or activities on their own
- Making friends with a child or young person's parents or carers and/or visiting them at home
- Giving gifts, money, toys, cards or letters to a child or young person
- Using texts, telephone calls, emails or social networking sites to communicate with a child or young person
- Being overly affectionate with a child or young person
- Flirting with or making suggestive remarks or sexual comments around a child or young person.

You may also hear other children and young people making jokes or references about a member of staff and a specific child. (NSPCC)

If someone is behaving in any of the ways listed above, this may not mean they are grooming or abusing a child. However, we all should understand what appropriate behaviour looks like. Abuse of position of trust is unacceptable and will be treated seriously with appropriate action. All concerns, including low level concerns need to be reported to Head of Safeguarding / Trust's DSO

41. Gifts and Favouritism

Staff should do not accept any gift that may be construed as a bribe by others or lead the giver to expect preferential treatment. All staff are expected to adhere to the Club's and Trust's Anti-Corruption and Bribery policies.

The Club recognises that there are occasions when children/ young people/ players or parents wish to pass small tokens of appreciation to staff, for example at Christmas or as a “thank you”, any gifts, no matter how small in value, need to be reported to both your line manager and Head of Safeguarding/ Trust DSO. It is unacceptable to receive gifts on a regular basis or of any significant value as this may be misinterpreted by others.

Equally it is not permitted for staff to give any personal gifts to children, young people, and players at the Academy. This could be misinterpreted as a gesture either to bribe, or to single out the child/young person/ player/ participant. It might also be perceived that a “favour” of some kind is expected in return.

Any reward given to a child/ young person must first be agreed with the staff member’s line manager as part of a structured reward system in line with the departmental policy and not based on favouritism.

42. Communication via social media

The Club and Trust is committed to the welfare and safety of all children and young people. In the interests of ensuring professional boundaries are maintained employees must not become friends with, or accept them to follow them, or add to any of their personal social media network or otherwise communicate via personal devices, including mobile phones, with any potential, current, or former children and young person or parents unless a clear reason exists, for example, they are a relative or family friend and this has been shared in writing with their line manager and Head of Safeguarding/ Trust DSO. Entering into such a relationship may lead to abuse of an employee’s position of trust and breach the standards of professional behaviour and conduct expected by the Club and Trust and will result in safeguarding investigation. Staff are respectfully referred to the Club/ Trust's social media Policy for further information.

43. Concerns about staff and safeguarding practices

If a staff member has concerns about another member of staff (including casual staff and volunteers), it will be raised with the Head of Safeguarding/DSO. If the concern is with regards to the Head of Safeguarding/ DSO, it will be referred to the CEO/ Club Secretary.

Any concerns regarding the safeguarding practices at Club or Tigers Trust will be raised with the Head of Safeguarding / Club Secretary at the Club and DSO or CEO at the Trust, and the necessary whistleblowing procedures will be followed, as outlined in the Whistleblowing Policy. See Safeguarding Team section for contact names and numbers.

Private Fostering:

A private fostering arrangement is one that is made privately (without the involvement of a Local Authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. (*Close family relative is defined as a ‘grandparent, brother, sister, uncle or aunt’ and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.)

The Club does not accommodate Under 16’s, however staff should be alert to situations where children/young people they come into contact with are subject to Private Fostering Regulations and report this to the Head of Safeguarding.

Each party involved in the private fostering arrangement has a legal duty to inform the relevant Local Authority at least six weeks before the arrangement is due to start, not to do so is a criminal offence. Once

the notification has been made to the Authority, Children's Services have a duty to visit and speak to the child, the parent and the foster carer; and everyone in the foster carer's household. Children's Services will then undertake a range of suitability checks including DBS checks on everyone in the household over the age of 16.

Seeking Medical Attention

If a child has a physical injury and there are concerns about abuse, and emergency medical attention is required, then this should be sought immediately by phoning for an ambulance. You should then follow the procedures by immediately sharing this information with the Head of Safeguarding/ Trust DSO, referring a child protection concern to Local Authority Children's Social Care.

Reporting Abuse:

Any form of abuse is not acceptable, being a victim of abuse is never their fault and should not be kept to them self. At Hull City and Tigers Trust, we will help!

Remember that it is not the responsibility of staff and volunteers to decide if abuse has taken place, but it is their responsibility to act on any concerns and report this to the Head of Safeguarding/ Trust DSO.

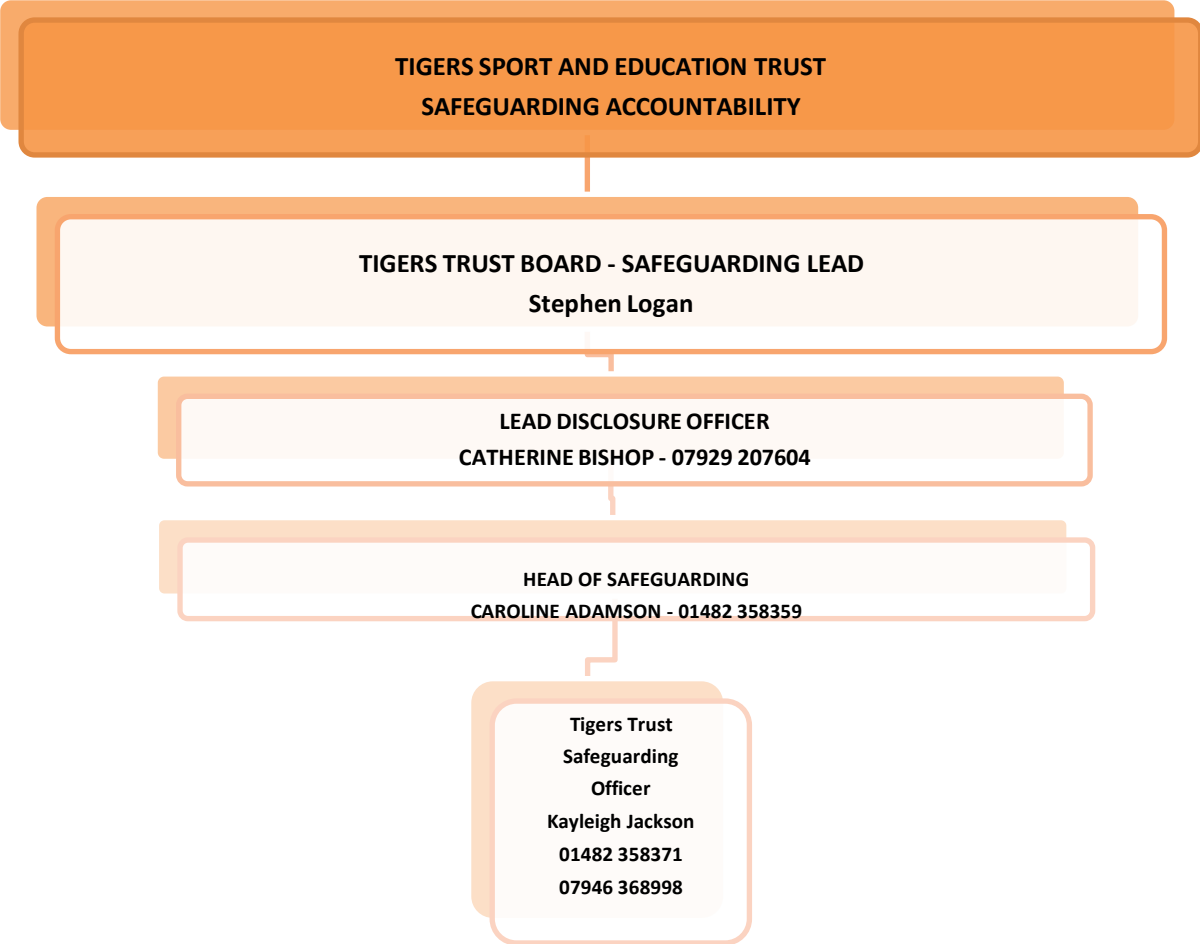
All staff have a responsibility to ensure the safety and welfare of all children, including that appropriate steps are taken to ensure that suspicion and allegations of abuse and poor practice are taken seriously and are reported immediately and appropriately to the Head of Safeguarding/Trust DSO.

Hull City will assure all staff and volunteers will be fully supported and protected when reporting any concerns about a colleague or others who is or may be abusing a child or adult at risk.

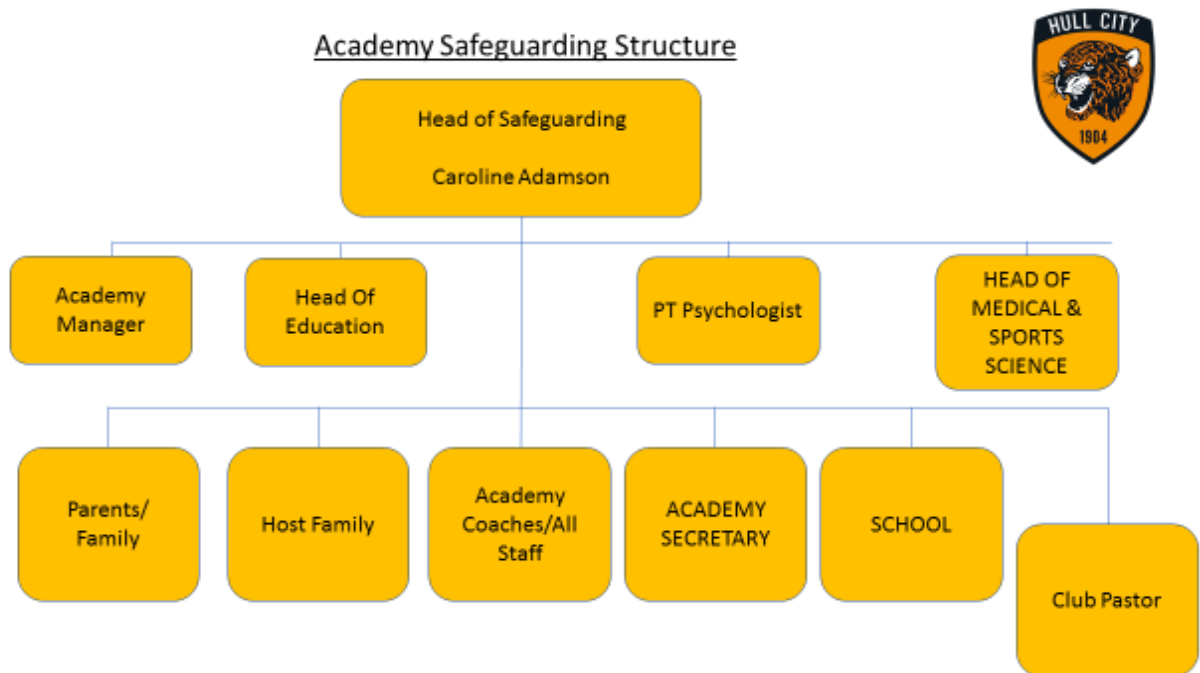
44. SAFEGUARDING ACCOUNTABILITY CHARTS



There is an additional reporting mechanism for the Tigers Trust to their CEO and Board of Trustees to enable them to fulfil their accountability as Trustees in accordance with Charity Commission Guidance, (see below).



Academy Safeguarding Structure:



Allegations against staff members / volunteers

If any member of staff or volunteer has concerns about the behaviour or conduct of another individual working within the group or organisation including:

- Behaving in a way that has harmed, 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 she/he is unsuitable to work with children.
- Engaged in a relationship with a child/young person under 18 whilst in a position of Trust with them i.e. have used the fact that they are in a position of power/trust to engage in an inappropriate relationship

The nature of the allegation or concern should be reported to the Head of Safeguarding/ Trust DSO immediately. If the concern is about the Head of Safeguarding, it should be reported to the Club Secretary. If the concern is about the Trust DSO, it should be reported to the Trust CEO.

The member of staff who has a concern or to whom an allegation or concern is reported should not question the child or investigate the matter further.

Referring concerns about a child:

The Head of Safeguarding will act on behalf of **Hull City** in referring concerns or allegations of harm to the relevant **Local Authority Children's Services Team, the Police Public Protection Unit; EFL and the FA.**

If the Head of Safeguarding is not available, then the **Trust DSO** shall take responsibility of sharing and referring the concern. If the **Head of Safeguarding/ Trust DSO** is in any doubt about making a referral, advice shall be sought from the Local **Authority Children’s Social Care Team**. The name of the child and family will be kept confidential at this stage and will be requested if the enquiry proceeds to a referral. It is not the role of the **Head of Safeguarding/ DSO’s role** to undertake an investigation into concerns or allegation of significant harm. It is the role of the **Head of Safeguarding/DSO** to collate and clarify details of the concern or allegation and to provide this information to the **Local Authority whose duty it is to make enquiries in accordance with Section 47 of the Children Act 1989**.

Emergency Contacts	Contact Number
Humberside Police	999 non-emergency matters 101
Hull EHASH (Children’s Social Care)	01482 448879 (daytime)
Hull Emergency Duty Team	01482 788080 (out of hours)
East Riding EHASH	01482 395500 (daytime)
East Riding Emergency Duty Team	01377 241273 (out of hours)
Advice can also be obtained from the following	Contact Details
EFL Safeguarding Team	01772 325800 safeguarding@efl.com
FA	088005000
NSPCC Helpline	080011111 www.nspcc.org.uk
ChildLine	080011111 www.childline.org.uk
LADO Hull	01482 379090
LADO East Riding	01482 396559

This Policy should be read alongside:

- Working Together to Safeguard Children 2018
- What to do if you are worried about a child being abused, 2015- advice for practitioners
- Keeping Children Safe in Education 2022

5. Relevant Legislation

- Working Together to Safeguard Children 2018
- Protection of Freedom Act 2012
- Keeping Children safe in education 2022
- The Children Act 1989 and 2004

- Health and Safety at Work Act 1974
- Modern Slavery Act 2015
- Private Fostering Regulations 2005
- SEN Code of Practice guidance 2015
- Counter Terrorism and Security Act 2015
- General Data Protection Regulations 2018
- Anti-social Behaviour, Crime and Policing Act 2014
- Care Act 2014
- Children and Social Work Act 2017
- Data Protection Act 2018 and The UK General Data Protection Regulation (UK GDPR)
- Domestic Abuse Act 2021
- Equality Act 2010
- Female Genital Mutilation Act 2003
- Safeguarding Vulnerable Groups Act 2006
- Serious Crime Act 2015
- Sexual Offences Act 2003
- Voyeurism (Offences) Act 2019
- Hull Safeguarding Adults Partnership Board

Club's Head of Safeguarding:

Caroline Adamson: caroline.adamson@wearehullcity.co.uk 07525873309

Caroline Adamson was appointed as the Club's Head of Safeguarding in February 2020. She holds a Bachelor of Art with Honours Degree in Social Work, awarded by the University of Hull, and has worked in the field of Child Protection and Safeguarding since 2007, including Barnardo's, East Riding of Yorkshire and Hull City Local Authority. She has over 15 years of safeguarding experience and is trained in Achieving Best Evidence / Section 47 Police Investigation. Caroline continues to be registered with the Governing Body, Social Work England. In addition, she has undertaken her Youth Mental Health First Aid training all the required EFL and FA Safeguarding training.

Tigers Trust Designated Safeguarding Officer:

Kayleigh Jackson: Kayleigh.jackson@tigerstrust.co.uk 07946368998

Kayleigh Jackson was appointed as the Tigers Trust Designated Safeguarding Lead in August 2020. She has worked as a Youth and Community Worker in Hull and the surrounding area for over 10 years having started her journey with the Trust in 2005, on work experience she was soon able to progress to a paid casual. During the last 17 years Kayleigh has continued to progress through the Trust to the position of Social Inclusion Manager, with responsibility for community and inclusion activities, with a large emphasis on youth delivery. Kayleigh has significant direct experience of working collaboratively with strategic and VCS partners to ensure the delivery of quality activities is safe and sits on the MACE panel. Kayleigh has undertaken the Youth Mental Health First Aid training and all required EFL and FA Safeguarding training. Kayleigh regularly represents the Trust at national events, showcasing our work and in 2021 Kayleigh

received the Civic Crown award for her services to the community of Hull and in 2022 was nominated for the Northern Power Women, Future Leaders Award.