

# Kensington Dragons FC

## Child protection and Safeguarding Policy

Spring 2025

Approved by: Chris Shirley  
Chair of Trustees

Date: 30<sup>th</sup> March 2025

Last reviewed on: 25<sup>th</sup> March  
2025

Next review due by: 25<sup>th</sup> March  
2026

### Important contacts

ROLE/ORGANISATION			NAME	CONTACT DETAILS
Club Welfare Officer (CWO)			Angela Thompson-Smith	07956991397 <a href="mailto:cwo@kensingtondragons.com">cwo@kensingtondragons.com</a>
Deputy Officer	Club Welfare		Magnus McDowall	07761 626313 <a href="mailto:Operations@kensingtondragons.com">Operations@kensingtondragons.com</a>

Local authority designated officer (LADO)	Aqualma Daniel	<a href="mailto:LADO@lbhf.gov.uk">LADO@lbhf.gov.uk</a> <a href="mailto:kclado.enquiries@rbkc.gov.uk">kclado.enquiries@rbkc.gov.uk</a>
Middlesex FA Safeguarding lead	Daniel Perkins	0208 5151920 <a href="mailto:safeguarding@middlesexfa.com">safeguarding@middlesexfa.com</a>
The FA safeguarding	n/a	0845 169 1863 <a href="mailto:Safeguarding@TheFA.com">Safeguarding@TheFA.com</a>

## 1. Aims

Kensington Dragons aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- KD staff are aware of their statutory responsibilities with respect to safeguarding
- KD Staff are properly trained in recognising and reporting safeguarding issues

## 2. Legislation and statutory guidance

This policy is based on The FA's Safeguarding and Children Policy and Procedures  
<https://www.thefa.com/football-rules-governance/safeguarding/section-1-football-safeguarding-framework>

This policy is also based on the following legislation:

- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)

, [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). To support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment

## 1. Definitions

**Safeguarding and promoting the welfare of children** means:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment whether that is within or outside the home, including online
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

**Child protection** is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

**Abuse** is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

**Neglect** is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

**Sharing of nudes and semi-nudes** (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

**Children** includes everyone under the age of 18.

**Victim** is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

**Alleged perpetrator(s)** and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

## 2. Equality statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances.

We ensure that all children have the same protection, regardless of any barriers they may face.

### 3. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and Trustees that are involved in the football club.

We have a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- Code of Conduct for parents, players and coaches

#### 4.1 Coaches and Volunteers

All staff will:

- Read and understand our Safeguarding and Child Protection policy
- Sign the Code of Conduct at the beginning of each season to say that they have reviewed the guidance
- Reinforce the importance of online safety when communicating with parents and carers.
- This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Know our systems that support safeguarding, including this child protection and safeguarding policy, the identity of the Child Welfare Officer (CWO)
- Know what to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- Know the signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- Know the importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- Know the fact that children can be at risk of harm inside and outside of their home, and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection

#### 4.2 The Club Welfare Officer (CWO)

The CWO is a member of the Operations team. Our CWO is Angela Thompson-Smith.

The CWO takes lead responsibility for child protection and wider safeguarding in the club.

The CWO can also be contacted via email at [cwo@kensingtondragons.com](mailto:cwo@kensingtondragons.com) and phone on 07956 991397

When the CWO is absent, the deputy – Magnus McDowall – will act as cover.

The CWO will be given the time, training, resources and support to:

- Provide advice and support to coaches/volunteers/parents on child welfare and child protection matters
  - Take part in strategy discussions and inter-agency meetings if and when necessary
  - Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police, The FA and Middlesex FA), and support staff who make such referrals directly
  - Have a good understanding of harmful sexual behaviour
  - The CWO is also the Prevent lead and will make sure staff have appropriate Prevent training and induction
- The CWO will also:
- Keep the Trustees and Chair informed of any issues
  - Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
  - Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

## **5. The Trustees**

The trustees will:

- Facilitate a whole-club approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Approve this policy at each review, ensuring it complies with the law, and hold the CWO to account for its implementation
- Ensure all staff undergo safeguarding and child protection training by The FA and that such training is regularly updated and is in line with advice from the safeguarding partners

The chair of the Trustees will act as the 'case manager' in the event that an allegation of abuse is made against the CWO, where appropriate.

## **6. Confidentiality**

The Trustees accepts that child protection raises issues of confidentiality, which should be clearly understood by all staff. Reports to the Trustees will not identify individual children.

Our approach to confidentiality and data protection recognises that:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe

- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- If a victim asks a coach not to tell anyone about the sexual violence or sexual harassment:
  - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
  - The CWO will have to balance the victim's wishes against their duty to protect the victim and other children
  - The CWO should consider that:
    - Parents or carers should normally be informed (unless this would put the victim at greater risk)
    - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
    - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
      - Regarding anonymity, all staff will:
  - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
  - Where possible reasonably protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
  - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information

If staff are in any doubt about sharing information, they should speak to the CWO (or deputy)

## 7. Recognising abuse and taking action

All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

- Is disabled
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Is a young carer
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded

Staff, volunteers and Trustees must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the CWO to mean “the CWO (or deputy CWO)”.

### 7.1 If a child is suffering or likely to suffer harm, or in immediate danger

Make a referral to children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**

Tell the CWO as soon as possible if you make a referral directly.

Our procedures for making a referral:

1. Call the children's social care team at the council in Hammersmith and Fulham on: 020 8753 6600 or 020 8748 8588 (out of hours)
2. Explain the nature of the concern. If possible, have the information/details relating to the child i.e. name, D.O.B. etc...



The following link is to the GOV.UK webpage for reporting child abuse to our local council:

<https://www.gov.uk/report-child-abuse-to-local-council>

## **7.2 If a child makes a disclosure to you**

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the CWO. Alternatively, if appropriate, make a referral to local authority children's social care and/or the police directly (see 7.1), and tell the CWO as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process bear in mind that some children may:
  - Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
  - Not recognise their experiences as harmful
  - Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the CWO if you have concerns about a child.

## **7.3 If you discover that FGM has taken place or a player is at risk of FGM**

FGM comprises "all procedures involving 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. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk might include:

- Having difficulty walking, sitting or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations



- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs Potential signs that a pupil may be at risk of FGM include:

**Any coach** who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. This is a mandatory statutory duty, for all adults working with young children.

Unless they have been specifically told not to disclose, they should also discuss the case with the CWO and involve local authority children's social care as appropriate.

**Any other member of Kensington Dragons** who discovers that an act of FGM appears to have been carried out on a **player under 18** must speak to the CWO and follow our local safeguarding procedures.

**Any member of KD** who suspects a player is *at risk* of FGM or suspects that FGM has been carried out should speak to the CWO and follow our local safeguarding procedures.

## Recognise; Respond; Report & Record

### 7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Where possible, speak to the CWO first to agree a course of action.

If in exceptional circumstances the CWO is not available, this should not delay appropriate action being taken. Speak the Deputy CWO and/or take advice from Middlesex FA Safeguarding Team. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the CWO as soon as practically possible.

### 7.5 Referral

If it is appropriate to refer the case to Middlesex FA Safeguarding Team or the police, the CWO will make the referral or support you to do so.

If you make a referral directly you must tell the CWO as soon as possible.

The CWO or person who made the referral must follow up with the FA if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the CWO or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

Social Services Duty Line: 020 8753 6946

LADO enquiries / Referrals: [LADO@lbhf.gov.uk](mailto:LADO@lbhf.gov.uk)

## **7.6 If you have concerns about extremism**

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the CWO first to agree a course of action.

If in exceptional circumstances the CWO is not available, this should not delay appropriate action being taken. Speak to the Deputy CWO or to The FA safeguarding Team.

Where there is a concern, the CWO will consider the level of risk and decide which agency to make a referral to. This could include the police or [Channel](#), the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

## **7.7 If you have a concern about mental health**

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

KD Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the CWO to agree a course of action.

- External agencies involved for support include:
  - o Calm 0800 585858
  - o Childline 0800 1111
  - o Mind 0208 5717454
- Social Services/Front Door: 020 8753 6600

## **7.8 Concerns about a Kensington Dragons coach, volunteer or Management**

If you have concerns about a member of staff posing a risk of harm to children, speak to the CWO as soon as possible. If the concerns/allegations are about the CWO, speak to The FA Safeguarding Team.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of Kensington Dragons to the CWO, report it directly to The FA Safeguarding Team.

## **7.9 Allegations of abuse made against other players**

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of players hurting other pupils will be dealt with under our Code of Conduct, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put players at risk
- Is violent
- Involves players being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

## **7.10 Procedures for dealing with allegations of child-on-child abuse**

If a player makes an allegation of abuse against another player:

- You must record the allegation and tell the CWO, but do not investigate it
- The CWO will contact The FA safeguarding Team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The CWO will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. The CWO will contact the children and adolescent mental health services (CAMHS), if appropriate and has been advised to do so.
- The CWO will record all investigation findings on the Club’s reporting system and along with other relevant club staff arrange to meet with the appropriate parents

If the incident is a criminal offence and there are delays in the criminal process, the CWO will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

## **7.11 Creating a supportive environment at Kensington Dragons and minimising the risk of child-on-child abuse**

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images

- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female players, and initiation or hazing type violence with respect to boys
- Ensure players are aware of how to and confidently report abuse via their manager, coach or CWO
- Ensure Kensington Dragons staff reassure victims that they are being taken seriously
- Ensure KD staff are up to date in their knowledge on:
  - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
  - That even if there are no reports of child-on-child abuse at the club, it does not mean it is not happening –KD staff should maintain an attitude of “it could happen here”
  - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - Children can show signs or act in ways they hope adults will notice and react to
    - A friend may make a report
    - A member of KD staff may overhear a conversation
    - A child’s behaviour might indicate that something is wrong
  - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
  - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
  - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
  - That they should speak to the CWO if they have any concerns
  - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

The CWO will take the lead role in any disciplining, alongside the advice of The FA, of the alleged perpetrator(s) after discussions with Trustees. We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident does not (in itself) prevent our club from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children’s social care to determine this
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

## 7.11 Sharing of nudes and semi-nudes ('sexting')

This is a suggested approach based on [guidance from the UK Council for Internet Safety](#) for all staff and for CWOs and Trustees.

### Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the CWO immediately. You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a player to share or download it (if you have already viewed the imagery by accident, you must report this to the CWO)
- Delete the imagery or ask the player to delete it
- Ask the player(s) who are involved in the incident to disclose information regarding the imagery (this is the CWO's responsibility)
- Share information about the incident with other members of KD staff, the player(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident and reassure the player(s) that they will receive support and help from the CWO.

### Initial review meeting

Following a report of an incident, the CWO will hold an initial review meeting with appropriate KD staff – this may include the member who reported the incident and the Deputy CWO. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to player(s)
- If a referral needs to be made to the police and/The FA Safeguarding Team/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the players involved which would influence risk assessment
- If there is a need to contact another club, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

The CWO will make an immediate referral to police and/or children's social care if:

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident.
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)

- What the CWO knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any player in the images or videos is under 13
- The CWO has reason to believe a player is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the CWO, in consultation with the Deputy CWO and other members of KD staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the clubs procedures.

If at the initial review stage, a decision has been made not to refer to police, The FA Safeguarding Team and/or children's social care, the CWO will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the players involved (if appropriate).

If at any point in the process there is a concern that a player has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

### **Informing parents/carers**

The CWO will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done through dialling 101 and asking to speak to the safer school's officer.

### **Referring to The FA Safeguarding Team**

If it is necessary to refer an incident to the FA safeguarding Team, this will be done through calling them directly and speaking to the Safeguarding Officer.

### **Recording incidents**

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded.

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## **7.12 Reporting systems for our players**

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring players feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- › Put systems in place for players to confidently report abuse
- › Ensure our reporting systems are well promoted, easily understood and easily accessible for players
- › Make it clear to players that their concerns will be taken seriously, and that they can safely express their views and give feedback. Our reporting systems for players are:
  - Speak to the coach or manager; do so in person by speaking,
  - Players are aware of the reporting systems and processes, e.g. through meetings at the beginning of the season
  - Players will be reassured that they have done the right thing if they make a disclosure

## **9. The use of mobile technology**

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our club aims to:

- › Ensure that all communications are with parents for match availability, training sessions etc via WhatsApp
- › No coach or manager to message any player directly without parental consent or knowledge

## **10. Notifying parents or carers**

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The CWO will normally do this in the event of a suspicion or disclosure.

Other KD staff will only talk to parents or carers about any such concerns following consultation with the CWO.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the The FA Safeguarding team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information



we provide about the other child involved, and when. We will work with the police, The FA Safeguarding Team and/or local authority children's social care to make sure our approach to information sharing is consistent.

The CWO will, along with any relevant members from Kensington Dragons or The FA Safeguarding Team (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. removing them from Kensington Dragons, and the reason(s) behind any decision(s)

## **11. Players with special educational needs, disabilities or health issues**

We recognise that players with SEND or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Players being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for players with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours during training or matches or the consequences of doing so

## **12. Players with a social worker**

Players may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance at matches or training, behaviour and mental health.

The CWO and all members of KD staff will work with and support social workers to help protect vulnerable children where applicable.

Where we are aware that a player has a social worker, the coach/manager/CWO will always consider this fact to ensure any decisions are made in the best interests of the player's safety, welfare and physical outcomes. For example, it will inform decisions about:

,

- Not attending training/match where there are known safeguarding risks
- The provision of pastoral support where possible

### **13. Players who are lesbian, gay, bisexual or gender questioning**

We recognise that players who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children.

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the CWO.

We will consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the player). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of KD staff.

### **14. Complaints and concerns about school safeguarding policies**

#### **14.1 Complaints against members of Kensington Dragons staff**

Complaints against KD staff that are likely to require a child protection investigation will be handled in accordance with The FA safeguarding policies and procedures.

#### **14.2 Whistle-blowing**

Kensington Dragons FC supports The FA's Whistle blowing Policy. Any adult or young person with concerns about an adult in a position of trust with football can 'whistle blow' by contacting The FA Safeguarding Team on 0800 169 1863, by writing to The FA Case Manager at The Football Association, Wembley Stadium, PO Box 1966, London SW1P 9EQ, by emailing [Safeguarding@TheFA.com](mailto:Safeguarding@TheFA.com) or alternatively by going direct to the Police, Children's Social Care or the NSPCC.

## 15. Training

### 15.1 All Kensington Dragons coaches/Volunteers

All KD members working in eligible roles with children and young people – managers, coaches, officials will undertake safeguarding and child protection training with Learn England.

This training will be regularly updated, every 2 years using the The FA learn England platform, there will also be yearly training led by the CWO at the beginning of each season.

Courses taken:

<https://learn.Englandfootball.com/courses/safeguarding/safeguarding-children-course>

<https://learn.Englandfootball.com/courses/safeguarding/safeguarding-children-course-recertification>

### 15.2 The CWO and deputy

The DSL and deputies in line with The FA's role profile are required to complete the Safeguarding Children and Welfare Officers Workshop. The CWO and Deputy will participate in any required Welfare Officer training provided by The FA. The CWO is the first point of contact for all club members regarding concerns about the welfare of any child or young person. The CWO will liaise directly with the County FA Welfare Officer and will be familiar with the procedures for referring any concerns. They will also play a proactive role in increasing awareness of **Respect**, poor practice and abuse amongst club members.

<https://learn.Englandfootball.com/courses/safeguarding/safeguarding-children-course-recertification>

### 15.3 Recruitment

All current Kensington Dragons FC members working in eligible roles with children and young people – managers, coaches, officials, trustees - are required to hold an in-date FA accepted Enhanced CRC/DBS as part of responsible recruitment practice.

If there are concerns regarding the appropriateness of an individual who is already involved or who has approached us to become part of Kensington Dragons FC, guidance will be sought from The Football Association. It is noted and accepted that The FA will consider the relevance and significance of the information obtained via the DBS process and that all suitability decisions will be made in accordance with legislation and in the best interests of children and young people.

It is accepted that The FA aims to prevent people with a history of relevant and significant offending from having contact with children or young people and the

opportunity to influence policies or practice with children or young people. This is to prevent direct sexual or physical harm to children and to minimise the risk of 'grooming' within football.

Any potential volunteer/coach will meet with the Director of Football and either the Chair of Kensington Dragons or Operations Manager plus being asked for 2 references before being formally offered a role at the club. Once offered a role they are expected to complete the DBS process plus complete the FA Safeguarding children online course before the commencement of their role.

## 15. The FA's Respect Programme

**Respect** codes of conduct for players, parents/spectators, officials and coaches have been implemented by Kensington Dragons FC. In order to validate these **Respect** codes of conduct, the club has clear actions it will take regarding repeated or serious misconduct at club level and acknowledges the possibility of potential sanctions which may be implemented by the County FA in more serious circumstances. All registering members will be required to adopt the Respect codes.

We aim to make sure that players

- **Enjoy The Game** - we're here to enjoy ourselves... win, lose or draw.
- **Give Respect** - we always treat others as we'd like to be treated.
- **Be Inclusive** - we embrace our differences... football is a game for everyone.
- **Work Together** - we're a team, on and off the pitch.
- **Play Safe** - we all have a role in safeguarding young people and vulnerable adults.

Together, these Standards of Behaviour promote a positive, inclusive and respectful football experience for everyone.

One in which your club can take pride in. One which makes even the strongest football clubs stronger.

One which better represents our communities.

## 16. Monitoring arrangements

This policy will be reviewed **annually** by the CWO in line with The FA safeguarding policy and will be reviewed by the Trustees.

# APPENDIX 1

## ADDITIONAL NOTES TO SUPPORT THE POLICY

### Types of abuse

**Abuse**, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

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

**Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

- › Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- › Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- › Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- › Seeing or hearing the ill-treatment of another
- › Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

**Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- › Physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- › Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

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

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

Once a child is born, neglect may involve a parent or carer failing to:

- › Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- › Protect a child from physical and emotional harm or danger
- › Ensure adequate supervision (including the use of inadequate care-givers)
- › Ensure access to appropriate medical care or treatment

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

## Preventing radicalisation

› **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence

› **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

- Negate or destroy the fundamental rights and freedoms of others; or
- Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- Intentionally create a permissive environment for others to achieve the results outlined in either of the above points

› **Terrorism** is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

We have a duty to prevent children from becoming involved with or supporting terrorism.

There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period.

KD Staff will be alert to changes in player's behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

- › Refusal to engage with, or becoming abusive to, peers who are different from themselves
- › Becoming susceptible to conspiracy theories and feelings of persecution
- › Changes in friendship groups and appearance
- › Rejecting activities they used to enjoy
- › Converting to a new religion
- › Isolating themselves from family and friends
- › Talking as if from a scripted speech
- › An unwillingness or inability to discuss their views
- › A sudden disrespectful attitude towards others
- › Increased levels of anger
- › Increased secretiveness, especially around internet use
- › Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- › Accessing extremist material online, including on Facebook or Twitter
- › Possessing extremist literature
- › Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

Staff should **always** take action if they are worried.

## **Sexual violence and sexual harassment between children**

Sexual violence and sexual harassment can occur:

- › Between 2 children of any age and sex
- › Through a group of children sexually assaulting or sexually harassing a single child or group of children
- › Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report. When supporting victims, staff will:

- › Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- › Regularly review decisions and actions, and update policies with lessons learnt
- › Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- › Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- › Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- › Challenging inappropriate behaviours
- › Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- › Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

## **Serious violence**

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- › Increased absence from school
- › Change in friendships or relationships with older individuals or groups
- › Significant decline in performance
- › Signs of self-harm or a significant change in wellbeing
- › Signs of assault or unexplained injuries



- › Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

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

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.