



## **Safeguarding Children Policy**

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## Safeguarding Children Policy

This policy acts as a statement of intent that demonstrates a commitment to safeguard all children involved with Bradford City Community Foundation (BCCF) from harm. BCCF are committed to the ongoing support of the survivors of historical abuse in football and promote the work undertaken by affiliated football authorities.

### Policy Aims

- Ensure all trustees are trained and aware of all issues around safeguarding and have the skills to set direction for the organisation.
- Ensure all staff are trained and aware of all issues around safeguarding and have the skills and knowledge to deal with any issues that arise.
- Ensure all staff are aware of the correct reporting procedures and are confident in following them.
- Ensure all children are protected from abuse when taking part in any of our programmes and that any abuse suffered by children whilst not on our programmes is reported and dealt with correctly.
- Ensure all children are safeguarded and promote their welfare.

### Definition of Safeguarding

In England, safeguarding children and promoting their welfare is defined as:

- protecting them from maltreatment,
- preventing impairment of their health and development,
- ensuring that they grow up in circumstances consistent with the provision of safe and effective care, and
- taking action to enable all children to have the best outcomes.

Further definitions can be found in Appendix 1.

### Our Values

1. No child or group of children must be treated any less favourably than others in being able to access services which meet their particular needs.
2. All children without exception have the right to protection from abuse regardless of gender, ethnicity, disability, sexuality or beliefs.
3. The policy is reviewed, approved and endorsed by the board of trustees annually or when legislation changes.
4. Everyone who the policy applies to including all trustees, staff and volunteers, children and parents are informed of the policy and procedures as appropriate.
5. All concerns and allegations of abuse will be taken seriously by all employees and responded to appropriately. This may require a referral to children's social care services or the Independent Local Authority Designated Officer (LADO). Allegations against staff, trustees and other volunteers, or emergencies may require the involvement of the police.
6. A commitment to safer recruitment, selection and vetting references inline with the principles, legislation and guidance that underpin this policy.
7. Associated policies and procedures which promote children's safety and welfare are:
  - Health & Safety Policy - Outlines BCCF's commitment to a safe working environment.

- Anti-bullying Policy - This policy intends to address issues arising between participants in NCS programmes, out students, volunteers or trainees. Bullying among staff members is covered in the staff handbook and contracts.
- Social Media Policy - Outlines our responsibilities in the use of social media and gives clear guidance.
- Data Protection Policy - This policy provides detailed guidance on how to protect individuals data including changes under GDPR.
- Equality Policy - Outlines BCCF's commitment to equal opportunities for all.
- Use of Images Policy - Outlines the issues around image sharing and the need to obtain consent for the taking of images and their use.
- Tours, Residentials and Trips Policy - Outlines our values and procedures before and during such activities.
- Confidentiality and Information Sharing Policy - Outlines the importance of confidentiality and the circumstances in which information can be shared.
- Whistle Blowing Policy -In accordance with the Public Interest Disclosure Act 1998, this ensures that BCCF has a system for reporting information which in your reasonable belief points to a criminal offence or wrong-doing at work. All staff must be aware of the procedure to follow which is detailed in the staff handbook.
- Code of Conduct - Outlines the behaviours that staff must follow and is detailed in the staff handbook.
- Grievance and Appeals Procedure - detailed in staff handbook
- Safe Working Practices - detailed in in staff handbook
- Staff Handbook - Has full and detailed information about the rights and responsibilities of staff working for BCCF.

All of these policies strengthen the aims of the safeguarding policy and provide additional information in certain circumstances.

## Roles and Responsibilities

**The Trustees** have a duty of care to ensure that all necessary steps are taken by staff to safeguard and protect children on all projects that BCCF deliver. The safeguarding lead must review the policy annually and it is a standing item on the agenda where incidents are discussed every 3 months.

**The Chief Executive** is responsible for reviewing any serious safeguarding concerns and reporting all incidents to the trustees. They must also sign off the policy each year.

**The Designated Safeguarding Officer (DSO)** is responsible for dealing with all safeguarding or child protection concerns reported, providing advice and support to staff on the ground. They are also responsible for escalating concerns to external organisations and the Senior Safeguarding Lead within the club. All incidents will be recorded in a central file by this individual. Each year the DSO will review and update this policy.

**All staff** are responsible for addressing safeguarding and child protection concerns and ensuring they are reported to the DSO using the procedures detailed in this policy. Staff will receive training in order to successfully do this.

## Legislation

There is a considerable body of legislation designed to ensure that all children are protected and it is important to understand that everyone is responsible for the safety of children. The main acts include:

- Children's Act 1989 & 2004
- Sexual Offences Act 2003
- Health & Safety at Work Act 1974
- Modern Slavery at Work Act 2015
- Private Fostering Regulations 2005
- Equality Act 2010
- Management of Health & Safety at Work Regulations 1999
- Working Together 2019
- Keeping Children Safe in Education 2020
- The Counter-Terrorism and Security Act 2015
- Female Genital Mutilation Act 2003
- General Data Protection Regulations 2018
- Protection of Freedoms Act 2012
- Education Act 2002

## Safer Recruitment and Staff Supervision Practices

### 1. Working Together to Safeguard Children

Safeguarding children is everyone's responsibility. If you are worried about a child it is important that you report your concerns - no action is not an option. We follow the guidelines in "Working together to Safeguard Children - A guide to inter-agency working to safeguard and promote the welfare of children". This provides clear definitions on a child centered approach to safeguarding and the expectations on each organisation and staff members.

### 2. Code of Conduct and Professional Boundaries

#### 2.1 Code of Conduct

The Safeguarding Code of Conduct aims to provide a framework for staff to support them in providing safer working practices when working with children. The Code of Conduct also helps staff to raise concerns without fear of recrimination and reduces the risk of malicious allegations being made against them.

The Safeguarding Code of Conduct can be found in appendix 2 and must be signed by all staff.

#### 2.2 Professional Boundaries and Good Practice Guidelines

All personnel are encouraged to demonstrate exemplary behaviour in order to safeguard children and vulnerable groups, to report any concerns about the welfare of a child and also to protect themselves from allegations.

We endeavour to :

- Always respond to any request to complete or update your DBS Criminal Records Check.
- Always inform the HR Department in respect of your behaviour with regard to any investigation, allegation or arrest which may have an impact upon the role you have in working with children or vulnerable groups.
- Always work in an open environment; for example, avoid private or unobserved situations and encourage an open environment, i.e. no secrets.
- Treat all children and vulnerable groups equally and with respect and dignity.
- Always put the welfare of each child first before winning and achieving goals.
- Always maintain a professional relationship with children for example, never have an intimate relationship with a child U18 (even if they are over 16 years old) when you are responsible for their supervision, care, support or coaching.
- Always maintain a professional relationship with vulnerable persons; for example, never have an intimate relationship with a vulnerable person (even if they are over 16 years old) when you are responsible for their supervision, care, support or coaching.
- Always maintain a professional relationship via social media which should be used appropriately and only for business purposes - see Social Media Policy.
- Build balanced relationships based on mutual trust which empowers children to share in the decision-making process.
- Recognise children with social workers may continue to be vulnerable and be educationally disadvantaged in attendance, learning, behaviour and mental health and to use this information to inform the response to further safeguarding concerns (e.g. absence, missing) and support.
- For football based projects: make it fun, enjoyable and promote fair play.

### 2.2.1 Coaching Contact

- Ensure that if any form of manual/physical contact is required, it should be provided openly and according to coaching guidelines provided by the National Governing Body (NGB) of the sport and in line with The Premier League or Football League Child Protection Guidance. Care is needed as contact may be difficult to maintain when a child is constantly moving. Young people/young players should always be consulted and their agreement gained. Some parents are becoming increasingly sensitive about manual support and their views should be carefully considered.
- All caregivers must be subject to DBS checks at the highest level.
- All staff should be vigilant and ensure adults around children act in accordance with the clubs standards. Staff are also responsible for those who enter changing rooms, etc.
- Ensure that at tournaments or residential events, the accommodation guidelines are followed.
- Be an excellent role model – this includes not smoking, not drinking alcohol, not using drugs or not using bad language in the company of children or vulnerable groups.
- When coaching, give enthusiastic and constructive feedback recognising the development needs and capacity of children and vulnerable groups – avoid excessive training or competition and do not push them against their will.
- Secure parental consent in writing to act, if the need arises, in emergency circumstances to give permission for the administration of medication or emergency treatment in line with the information advised on the current 'Parental Consent Form' as amended from time to time (see appendix 3).
- Keep a written record of any injury or incident that occurs, along with the details of any treatment given and/or action taken using this [form](#). Advise parents/guardians and the DSO on any issue in relation to any treatment of children or vulnerable groups.
- Request written parental consent if BCCF staff are required to transport children or vulnerable groups in their cars and ensure that coaches/staff are accompanied by another member of staff. This should be avoided unless absolutely necessary.

### 2.3 Supervision of Children and Young People

Bradford City FC Community Foundation follows EFL Regulations (and in particular Youth Development Rule 119), in respect of the supervision of children. This rule clearly stipulates the ratio of staff to children be no less than 1:10 (save that the ratio for Category 1 Academies using the Full Time Training Model which shall be 1:8). However, NSPCC guidance recommended adult to child ratios. These are based on Ofsted guidelines.

Remember that regardless of the overall ratio, a minimum of two supervisors must be present at all times. It is to be noted that a dynamic risk assessment may well indicate the need for an enhanced level of supervision and staffing for a particular activity. The following table shows NSPCC recommendations:

Child/Young Person's Age	Number of Adults	Number of Children
0-2	1	3
2-3	1	4
4-8	1	6

9-12	1	8
13-18	1	10

Bradford City FC Community Foundation will endeavour to follow NSPCC guidance regarding staff to child ratios whenever possible but in all circumstances will always adhere to EFL rules. If the group is mixed gender, the supervising staff should also include both male and female staff wherever possible.

Where Lone Working is an integral part of a role e.g. Academy Teacher or Driver then additional risk assessment strategies will be put in place e.g:

- Remain visible and/or teach in a communal area
- Ensure a colleague is made aware of when and where you are and why
- Prop a door open (so long as this does not constitute a fire safety hazard)
- When transporting a lone child, they should be seated in the rear of the vehicle

Staff must never work alone if they are concerned about risks to themselves or others in the situation:

- Being a risk for abuse
- Being accused of perpetrating abuse

A full policy for Lone Working is available on request.

### 3. Safer Recruitment Procedures for BCCF Staff and Contracted Providers

We have in place a safer recruitment procedure for individuals whom Bradford City Community Foundation and the Football Club will permit to work regularly with children. This includes children taking part in our NCS programme and children studying with us on the BTEC Level 3 Football Education programme.

#### 3.1 DBS & Training

We always obtain an Enhanced Disclosure and Barring check which is renewed every three years. We are responsible for ensuring that all staff are competent to carry out their responsibilities for:

- Safeguarding and promoting the welfare of children.
- Creating an environment where staff feel able to raise concerns and feel supported in their safeguarding role.

This is achieved by thorough training during induction, followed by annual training including CPD.

The Football League and the English Football League Trust (the umbrella body for all Football Community Foundations) recognises and adopts FA DBS as an appropriate umbrella body for processing Criminal Records Checks to safeguard children in football. An enhanced DBS Criminal Records Check through the above system is mandatory for all persons applying for, or currently in, such positions that are defined in law as 'Regulated Activity,' or that The FA deems relevant and whose normal duties include coaching, teaching, training & instruction, caring for & supervising or providing advice & guidance on wellbeing for children. Failure to comply with FA Disclosure and Barring process may result in sanctions and possible suspension.



We are committed to the fair treatment of our staff, potential staff and users of our services, regardless of race, gender, religion, sexual orientation, responsibilities for dependants, age, physical/mental disability or offending background. We will only ask for a DBS check when the work or volunteering will involve working with children, young people or adults at risk (please see our recruitment of offenders policy).

### **3.2 Safer Recruitment Process**

The process includes a minimum of:

- A role/job specification
- Advertisement of the role in line with club policy
- Information of whether a DBS check is to be carried out
- Shortlisting process using CV or application form
- Interview process
- Enhanced Disclosure and Barring Checks for those working with children or vulnerable adults, in line with guidance provided by the DBS, The FA and The English Football League.
- Verification of identification, appropriate qualifications and eligibility to work in the UK, including checking with The FA to ensure that the applicant is not suspended from football for all coaching.
- The taking up of two written references
- Employment offers, subject to all of the above, and a successful probationary period.

## **4. Breach of Professional Boundaries**

### **4.1 Reporting a Breach**

If you have any concerns about a breach or a potential breach of professional boundaries by yourself, colleague or external agency, this must be shared immediately with the DSO. This must be done, regardless of whether the breach had intentions of well meaning. Any breaches can place children at risk of harm and you have a duty of care to act on any safeguarding concerns.

If you do not feel comfortable raising issues with the DSO, then report via the Whistleblowing Policy.

### **4.2 Managing Allegations**

All allegations of potential breaches must be taken seriously, whether it is a one off event or a series of events and interactions. Staff must be supported to address any allegations regarding a breach of professional boundaries without an automatic disciplinary, dismissal or referral to any organisations including Regulatory bodies, Local Authorities, DBS and/or the police as appropriate.

An investigation will be conducted to establish the facts, and the DSO, Chief Executive and Trustees will decide if there is a disciplinary case to answer - please see Disciplinary Policy. All breaches and investigations will be recorded in individual staff files, including the outcome.

## Safeguarding All

### 5. Assessing Risks

BCCF will assess the potential for risks when planning activities. However, to ensure the welfare of children within our care, it is important to always ask the following basic questions:

- What is the activity?
- What are the ages involved?
- Where is the activity going to take place?
- Are there any special needs within the group?
- Are there mixed groupings?
- What experience and qualification do the organisations have?
- Do you require someone who has appropriate first aid training?

The principle for assessing potential risks remains the same whatever the activity, therefore you need to consider these and decide what ratio of adults to children you consider to be appropriate to ensure their safety. For all projects, bar NCS, the ratio is 1:16. For NCS it is 2:16.

#### 5.1 Raising Awareness of Potential Vulnerability

This safeguarding policy is inclusive and the same action should be taken regardless of the needs and background of the child and young person. BCCF recognises however that some children and young people are disadvantaged by their experience and would want to highlight the following:

##### 5.1.1 Children with Disabilities

Disabled children are up to four times as likely to be abused as non-disabled children. Deaf and disabled children may be especially vulnerable to abuse for many reasons such as:

- An increased likelihood of social isolation.
- Fewer outside contacts than non-disabled children.
- Dependency on others for practical assistance in daily living (including intimate care).
- Impaired capacity to resist, avoid or understand abuse.
- Communication needs may also make it difficult to tell others what is happening, as well as limited access to someone to disclose information to and a particular vulnerability to bullying.

Deaf and disabled children's vulnerability is increased by:

- Being viewed as a "safe target" for abusers.
- Increased grooming opportunities and the increased power inequality.
- Possibly not knowing that the abuse is inappropriate.
- Children not having the language skills to disclose or giving a confused account of the abuse.
- Deaf and disabled children being less likely to be listened to or misunderstood
- Denial of the possibility of abuse (particularly sexual abuse).
- The dependency on multiple adults which can lead to, for example, restricted mobility within intimate care needs.

- More reliance on others and more used to obeying instructions.
- Inexperience of deaf and disabled young people in making their own decisions and believing their wishes are not heeded.
- Parents/carers being viewed as “saints” for coping with a disabled child and therefore not considered as potential risks when a situation occurs.

Disabled children may be additionally abused in a number of ways:

- **Neglect** – A child could be confined to their room/space, have a lack of appropriate care and supervision or be deprived of visitors and interaction with others.
- **Sexual** – A child could be subject to inappropriate personal care or be abused by someone taking advantage of one-to-one supervision arrangements.
- **Physical** – Drugs/medication given incorrectly to a child, insufficient treatment, misuse of medication or inappropriate restraint of a child.
- **Emotional** – A lack of stimulation or over protection of the child. Also the child may suffer because expectations are too low or high, or they could suffer from a lack of privacy appropriate to their age.

### 5.1.2 Children from Minority Ethnic Background

Children from minority ethnic groups are additionally vulnerable because they may be:

- Experiencing racism and racial attitudes.
- Experiencing racism and being ignored by people in authority.
- Afraid of further abuse if they challenge others.
- Subjected to myths, e.g. all people of a particular culture are good at running.
- Different methods of discipline within cultures.
- Wanting to fit in and not make a fuss.
- Using or learning English as a second language.
- From diverse cultural backgrounds and caste.
- Cultural discrimination within nationalities i.e. Roma.

## 6. Reducing the Potential for Vulnerability

Bearing in mind children can be and are disadvantaged by these and other experiences, it is important for all to be extra vigilant in creating a safe culture, including:

- Finding ways of communicating with all children.
- Ensuring best practice at all times in physical and health care.
- Developing knowledge of the diverse cultures they serve.
- Respecting cultural differences.
- Building relationships with parents and carers and including all families in club activities.
- Observing changes in mood, appearance and behaviour.

### 6.1 Taking a Proactive Approach

- Ensure the Football Association’s definition of bullying and its anti-bullying policy is promoted.
- Ensure that you take all signs of bullying or discrimination seriously.
- Develop an open environment that encourages children to share their concerns.

- Ensure all staff read the policy and understand the reporting procedures.

## **7. Action Towards Bullying**

### **7.1 Action to Help the Victim and Prevent Bullying or Discrimination**

- Take all signs of bullying and discrimination very seriously.
- Encourage all children to speak and share their concerns (it is believed that upto 12 children per year commit suicide as a result of bullying, so if anyone talks about or threatens suicide, seek professional help immediately). Help the victim to speak out and escalate to your line manager or DSO.
- Investigate all allegations and take action to ensure the victim is safe. Speak with the victim and the bully(ies) separately.
- Reassure the victim but do not make promises of confidentiality or outcome, which might not be feasible in the light of subsequent developments.
- Keep records of what is said (what happened, by whom, when).
- Report any concerns to the DSO or the school (wherever the bullying/discrimination is occurring).

### **7.2 Action Towards the Bully(ies)**

- Talk with the bully(ies), explain the situation, and try to get them to understand the consequences of their behaviour. Seek an apology to the victim(s).
- Inform the bully(ies) parents.
- Insist on the return of 'borrowed' items and that the bully(ies) compensate the victim.
- Provide support for the victim.
- Impose sanctions as necessary.
- Encourage and support the bully(ies) to change behaviour.
- Hold meetings with the families to report on progress.
- Inform all organisation members of action taken.
- Keep a written record of action taken.

## Guidelines for Safeguarding Children's Welfare

### 8. Table of Child Abuse

The below table details the four different forms of child abuse, including general information and potential warning signs.

Forms of Child Abuse	Information	Warning Signs
<b>Sexual Abuse</b>	<p>Both boys and girls can be sexually abused in the following ways:</p> <ul style="list-style-type: none"> <li>• Full sexual intercourse, masturbation, oral sex and fondling.</li> <li>• Showing children pornographic books and videos.</li> <li>• Asking children to take part in making videos or taking photographs.</li> </ul>	<ul style="list-style-type: none"> <li>• Pain, itching, bruising or bleeding in the genital area.</li> <li>• Stomach pains.</li> <li>• Discomfort when walking.</li> <li>• Unexplained sources of money.</li> <li>• Inappropriate drawings, language or behaviour.</li> <li>• Aggressive withdrawn behaviour or fear of one person.</li> </ul>
<b>Physical Abuse</b>	<p>Physical abuse can be in the form of injuries sustained through hitting, shaking, squeezing, biting or burning. In certain cases abuse may occur when the nature and intensity of training exceeds the capacity of the child's body.</p>	<ul style="list-style-type: none"> <li>• Unexplained or untreated injuries.</li> <li>• Injuries or unlikely parts of the body.</li> <li>• Cigarette burns, bite or belt marks, scalds.</li> <li>• Fear of parents being contacted, going home or receiving medical advice.</li> <li>• Flinching when touched.</li> <li>• Refusal to discuss injury.</li> <li>• Covering arms and legs.</li> </ul>
<b>Emotional Abuse</b>	<p>This form of abuse includes:</p> <ul style="list-style-type: none"> <li>• Persistent lack of love or affection.</li> <li>• Frequent shouting at children.</li> <li>• Taunting children.</li> <li>• Over protection which can lead to poor social skills.</li> </ul> <p>Emotional abuse may include situations where parents, coaches or organisers subject children to constant criticism, bullying or unrealistic pressure to perform to high expectations.</p>	<ul style="list-style-type: none"> <li>• Over reaction to mistakes.</li> <li>• Sudden speech disorders.</li> <li>• Extreme emotions.</li> <li>• Self mutilation.</li> </ul>
<b>Neglect</b>	<p>Where adults:</p> <ul style="list-style-type: none"> <li>• Fail to meet a child's basic physical needs e.g. for food, warmth and clothing.</li> <li>• Constantly leaves children alone or unsupervised.</li> <li>• Fails or refuses to give children</li> </ul>	<ul style="list-style-type: none"> <li>• Poor personal hygiene.</li> <li>• Constantly hungry.</li> <li>• Inappropriate clothing or dress.</li> <li>• Constantly tired.</li> <li>• Lonely, no friends.</li> <li>• Underweight.</li> </ul>

	<p>love, affection or attention.</p> <p>Neglect may also occur during organised activities if young people are placed in an unsafe environment, are exposed to extreme weather conditions or where they are at risk of being injured.</p>	<ul style="list-style-type: none"> <li>• No parental support or interest.</li> <li>• Dishevelled appearance.</li> </ul>
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## 9. Forms of Abuse

There are many different forms of abuse that children can suffer from including child exploitation, female genital mutilation (FGM) and forced marriage. A list of different forms of abuse, along with information for each can be found in appendix 4.

## 10. Private Fostering

A privately fostered child is a child under 16 (or 18 if disabled) who is cared for by an adult who is not a parent or close relative where the child is to be cared for in that home for 28 days or more. Close relative is defined as "a grandparent, brother, sister, uncle or aunt (whether of the full blood or half blood or by marriage or civil partnership) or step-parent." A child who is looked after by a local authority or placed in a children's home, hospital or school is excluded from the definition. In a private fostering arrangement, the parent still holds Parental Responsibility and agrees the arrangement with the private foster carer. A child (as per definition above) placed with a host family for 28 days or more is in a private fostering arrangement and therefore Clubs with host families should inform and work with their local authority ensuring that they meet legislative and local procedural requirements.

## 11. Prevent

### 11.1 Radicalisation

The process by which a person comes to support terrorism and forms of extremism leading to terrorism. Anybody from any background can become radicalised. The grooming of children and/or adults at risk for the purposes of involvement in extremist activity is a serious safeguarding issue.

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 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.

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

### 11.2 Prevent Policy

From 1st July 2015, all schools and childcare providers were required, under section 26 of the Counter Terrorism and Security Act 2015, to have due regard to the prevention of people from being drawn into terrorism. This legislation is primarily aimed at the education system.

However, all agencies having contact with young people must adhere to the prospect of preventing radicalisation. BCCF is responsible for the welfare of all children and young people that partake in sport or other projects. BCCF adopts the policy strategy laid down by the law to ensure the safeguarding of all.

In dealing with the Prevent Duty it is important to recognise that the dealings that a club official will be different to those of a child care professional, however, there are areas that will overlap and these are reproduced here:

- The general risks affecting children and young people may vary from area to area, and according to their age.
- Schools and childcare providers are in an important position to identify risks within a given local context.
- It is important that schools and childcare providers understand these risks so that they can respond in an appropriate and proportionate way.
- There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology.
- As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Children at risk of radicalisation may display different signs or seek to hide their views.

The Prevent duty does not require teachers or childcare providers to carry out unnecessary intrusion into family life but as with any other safeguarding risk, they must take action when they observe behaviour of concern. There may not be any one sign which will lead you to the belief a young person is being radicalised. The general risks affecting children and young people may vary from area to area, and according to their age. There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, club personnel should be alert to changes in children's behaviour that could indicate that they may be in need of help or protection. In these cases, the general safeguarding principles apply to the 'Keeping Safe' from radicalisation as per the general safeguarding relevant statutory guidance and Stevenage Football Club policy. Any concerns of a young person being at risk demonstrated by behaviour on or off the pitch, views posted online or concerns from family or friends should be referred to the safeguarding lead. Concern does not require any person to carry out any form of investigation but will ultimately be referred to the relevant professional body.

## Disclosures and Concerns

### 12. What to do if a Child Discloses to You

If a child or young person informs you directly that they are concerned about someone's behaviour towards them, this is known as disclosure. The person receiving the disclosure should:

- React calmly so as not to frighten the child or young person.
- Tell the child that he or she is not to blame and that he or she was right to tell.
- Take what the child says seriously.
- If the child needs immediate medical treatment, take them to hospital or telephone for an ambulance, inform doctors of concern and ensure they are aware that it is a child protection issue.
- Ensure the immediate safety of the child.
- Avoid leading the child and keep any questions to the absolute minimum. Ask only what is necessary to ensure a clear understanding of what has been said.
- Reassure the child but do not make promises of confidentiality or outcome, which might not be feasible in the light of subsequent developments.
- In the event of suspicion or sexual abuse do not let the child bathe or shower until given permission to do so. Washing can destroy valuable evidence.
- Inform parents/carers immediately unless you have specific reason not to (e.g. the child has named the parent/carer as the abuser). If this is the case then contact the designated person. If they are unavailable, contact local Social Services or the Police for guidance.
- The judgement about whether an incident is one of child abuse or poor practice may not be able to be made at the point of referral, but only after the collection of relevant information.

### 13. Information for Social Services or the Police About Suspected Abuse

To ensure that this information is as helpful as possible, a detailed record should always be made at the time of the disclosure/concern which should include the following:

- The child's name, age and date of birth of the child.
- The child's home address and telephone number.
- Whether or not the person making the report is expressing their own concerns or those of someone else.
- The nature of the allegation - include dates, times, any special factors and other relevant information.
- Make a clear distinction between what is fact, opinion or hearsay.
- A description of any visible bruising or other injuries. Also any indirect signs, such as behavioural changes.
- Details of witnesses to the incidents.
- The child's account, if it can be given, of what has happened and how any bruising or other injuries occurred.
- Have the parents been contacted? If so, what has been said?
- Has anyone else been consulted? If so, record details.
- If the child was not the person who reported the incident, has the child been spoken to? If so, what was said?
- Has anyone been alleged to be the abuser? Record details.
- Where possible referral to the police or social services should be confirmed in writing within 24 hours and the name of the contact who took the referral should be recorded.



## 14. Reporting Concerns

Safeguarding is a key priority for BCCF and this is highlighted in all Service Level Agreements (SLA's) with schools and other partners we work with, however BCCF always reserves the right to follow our own procedures where there is doubt or a lack of clarity in a partners procedures. Please follow these steps:

1. If you have reason to believe that a child is at **immediate risk of harm**, contact the police on **999**.
2. If you are worried about a child, an incident has occurred, a child has disclosed to you or there is an allegation against staff, then you need to report your concerns to the DSO (Lizzie Saunderson) via the Tootoot app or [website](#). If you do not have a login for this then please contact Lizzie, or in her absence, the Chief Executive (Ian Ormondroyd). For any concerns involving participants of the Disability Football Club, Jaimie Dorward is the DSO and must be contacted first. For high level incidents, report as soon as aware, for medium or low level report within 24 hours.
  - **Ian Ormondroyd: CEO - 01274 706850**
  - **Lizzie Saunderson: DSO – 07469234066**
  - **Jaimie Dorward: DSO for Disability Club - 07818515639**
3. If the child needs **immediate medical treatment** take them to a hospital or call an ambulance and tell them this is a child protection concern. Let the DSO know what action you have taken, and inform the EFL Trust.
4. Once reported on Tootoot, the DSO can put a plan of action in place.

## 15. Next Steps and Useful Contacts

Once information is reported, the DSO will deal with the disclosure/incident/allegation and will conduct the relevant authorities.

If the issue is one of **poor practice** they will either:

- Deal with the matter themselves
- Seek advice from BCFC Senior Safeguarding Officer - **Paula Watson** on **07967 510560**
- Seek advice from the County FA Welfare Officer - **Paul Ratcliffe** on **paul.ratcliffe@westridingfa.com**
- Seek advice from EFLT's Safeguarding Manager - **Tara Lawson** on **07964 905652**

If the concern is more serious - **possible child abuse** - in addition to the above, Bradford Council Children Safeguarding Services, and/or the Police or Children's Services will be contacted.

Some projects require specific reporting procedures in addition to the above:

- For BTEC/Futsal programme contact **Craig Taylor** at **Oasis** on [craig.taylor@oasislisterpark.org](mailto:craig.taylor@oasislisterpark.org)
- For any issues around trainees contact **Henry Seaton** or **Adrian Tallon** at **EFLT** on **07583 491701**.
- For Premier League Primary Stars contact **Matt Baird** or **Ross McKinley**.

- For NCS contact **Tara Lawson** at **EFLT** on **07964 905652** and follow NCS incident reporting manual.

### **15.1 Other Useful Contact Details**

Bradford Council Children Safeguarding Services

During working hours: Monday to Thursday (8:30am to 5:00pm) and Friday (8:30am to 4:30pm) - **01274 437500**

Out of hours: Emergency Duty Team - **01274 431010**

Bradford Police

**01274 437500**

Bradford Local Authority Designated Officer

Contact for allegations against adults working in a position of trust - **01274 434343** or

[cpuduty@bradford.gov.uk](mailto:cpuduty@bradford.gov.uk)

West Riding Fa

Out of hours: **07912 309565**

Football League Child Protection Advisor

**01772 325 811** or **07795 628 379**

FA Safeguarding Team

**0800 169 1863** or [safeguarding@thefa.com](mailto:safeguarding@thefa.com)

English Football League Trust

**07583 491701**

NSPCC 24 hour Helpline for advice on **0808 800 5000**

Disclose and Barring

We would follow the referral procedure found at

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

## Confidentiality

### 16. Information Sharing

BCCF are committed to sharing information for the purposes of safeguarding and promoting the welfare of children and young people in line with Working Together (2019) and with respect for The General Data Protection Regulations (2018). Any decision to break confidentiality should always be preceded by staff informing the complainant of what is about to happen and the reason for the decision. The staff member should also try to seek the consent of the person who makes the disclosure. There will be no breach of confidentiality if the person to whom a duty of confidence is owed, consents to the disclosure. Staff should, in the first instance, seek the consent from the person if considering sharing information with other agencies. It is therefore essential that members of staff understand the balance between the need for confidentiality and the need for the sharing of information. For that reason, they must not promise absolute confidentiality to the person who discloses any concern or allegation. Information which is considered important in protecting the safety and welfare of the child or vulnerable groups will be shared by the Club and Foundation with the appropriate statutory and regulatory agencies in order to seek help and keep those involved safe.

If a person discloses information and asks for it to be kept confidential then this person cannot be told that information (disclosure) is totally confidential since it has to be passed on or referred for help to be sought. Every effort should be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a need to know basis only. This includes (but is not limited to) the following people:

- DSO.
- The parents/guardian of the person who is alleged to be abused (only with guidance from statutory agencies).
- The person making the allegation.
- Social Services/Police.
- Chief Executive Officer
- Department Head/Direct Line Manager.
- The alleged abuser (and parents if the alleged abuser is a child) \*.

### 17. Historic Complaints

Allegations of harm or abuse may be made some time after the event, e.g. by an adult who was abused as a child or by a member of staff who is still currently working with children. Where such an allegation is made we will follow the procedures as detailed in this policy and report the matter directly to the Police or Social Services.

### 18. GDPR/Data Protection

Well-kept records are essential in situations where it is suspected or believed that a child may be at risk of harm. The organisation has a clear policy on the management of records, confidentiality, and sharing of information, which adhere to the requirements of GDPR and the Data Protection Act 2018 (see Data Protection Policy). Trustees and staff are clear about what information can be shared with relevant people within and outside of the organisation and have access to specialist advice if they are unsure.

Information is to be stored in a secure place with limited access to designated people in line with data protection laws, so that information is accurate, regularly updated, relevant and secure.

## COVID-19 - Updated January 2021

This amendment should be read in conjunction with BCCF's Safeguarding Policy and Safeguarding Code of Conduct.

### 19. Statement

The way in which our foundation is currently operating in response to coronavirus (COVID-19) is different to business as usual, however, a number of our important safeguarding principles remain the same:

- With regard to safeguarding, the best interests of children will always continue to come first.
- If anyone has a safeguarding concern about any child connected to BCCF they should continue to act and act immediately.
- A DSO or Deputy will always be available.
- Unsuitable people are not allowed to enter the BCCF workforce and/or gain access to children.
- Children continue to be protected when they are online, if applicable during lockdowns, or due to isolating with COVID-19.

#### 19.1 Safeguarding Contacts

Under current COVID restrictions, Safeguarding contacts for BCCF remain the same and are as follows:

**Lizzie Sanderson**  
**BCCF DSO**  
07469 234066 | [lizzie.sanderson@bcfccommunity.co.uk](mailto:lizzie.sanderson@bcfccommunity.co.uk)

**Paula Watson**  
**Club Senior Safeguarding Manager**  
07967510560 | [paulawatson@bradfordcityafc.com](mailto:paulawatson@bradfordcityafc.com)

### 20. Procedures and Safety Measures for Online Learning

BCCF expects all staff to adhere to the relevant policy and boundaries must be maintained at all times. We have put extra measures in place to reduce the risks in relation to online learning which include:

- All contact online being observable and interruptible.
- Staff and children must wear suitable clothing as should anyone else in the household.
- Any computers being used should be in appropriate areas, for example not in bedrooms and the background should not be blurred.
- Online teaching will not be carried out on a one to one basis and will be done in a group setting with multiple students and teachers present.
- Another staff member will be invited to be present in the room.
- All communication provided will have an educational purpose.
- Language must be professional and appropriate, including any family members in the background.
- BCCF will record online teaching/instruction sessions. Children and parents will be informed that sessions are being recorded in advance of doing so.

- All sessions provided will be via the Clubs I.T. platform (for example remote desktop) or Wi-Fi (where possible).

### **20.1 Online Safety**

- It is important that internet safety and security messages are re-enforced during this time when we are expecting young people to be online more often. They may also be increasing their usage on devices during their own free time during this lockdown period. It is important that both students and parents are aware of the help and support available should they be concerned about something they have seen or experienced online. These include:
- UK Safer Internet Centre - <https://reportharmfulcontent.com/>
- CEOP - <https://www.ceop.police.uk/safety-centre/>
- Internet Matters - <https://www.internetmatters.org/>
- NetAware - <https://www.net-aware.org.uk/>
- ParentInfo - <https://parentinfo.org/>
- ThinkuKnow - <https://www.thinkuknow.co.uk/>

## Appendices

### Appendix 1 - Definitions

Child/Children	A child is defined as under the age of 18 (The Children Act 1989) and all children under this age must have parental consent in order to partake in any of our projects. This definition all refers to young people or students.
Safeguarding	In England, safeguarding children and promoting their welfare is defined as: <ul style="list-style-type: none"> <li>● protecting them from maltreatment,</li> <li>● preventing impairment of their health and development,</li> <li>● ensuring that they grow up in circumstances consistent with the provision of safe and effective care, and</li> <li>● taking action to enable all children to have the best outcomes.</li> </ul>
Child Protection	In England, child protection can be defined as measures and structures to prevent and respond to abuse, neglect, exploitation and violence affecting children. Child protection means safeguarding children from harm. Harm includes violence, abuse, exploitation and neglect.
Abuse	Abuse refers to anything that causes a child harm or distress. These include physical, emotional, sexual and neglect.
Allegation	Information which comes to light which suggests a staff member may have committed a criminal offence against a child or has behaved in such a way towards a child that they may be considered as unsuitable to continue in their current employment or in any capacity which involves working with children.
Staff	Staff are defined as any member of the workforce either paid or unpaid, including volunteers.
Trustee	A trustee refers to an individual in a charity who acts as a 'guardian of purpose', making sure that all decisions put the needs of the beneficiaries first. They safeguard the charity's assets – both physical assets, including property, and intangible ones, such as its reputation. They have a duty of care with safeguarding, ensuring staff are adhering to the policy.
Vulnerable Groups	Vulnerable groups are defined as the collective term used when talking about or referring to children, young people and adults at risk as a whole. We recognise that children with special educational needs and disabilities can face additional safeguarding challenges, and we have a risk assessment process in place for any such circumstances.

## **Safeguarding Code of Conduct**

**In its simplest form, 'safeguarding' can be defined as 'keep children, young people and adults at risk, safe from harm'.**

At Bradford City Community Foundation (BCCF), we believe that all trustees, staff, workers and volunteers share responsibility for safeguarding and promoting the welfare of children, young people and adults at risk. The Safeguarding Code of Conduct below sets out BCCF's expectations, and should be read alongside both the Safeguarding Children and Safeguarding Adults at Risk Policies.

As a member of staff, this Safeguarding Code of Conduct forms part of your contract of employment, and as a worker/volunteer it forms part of the agreement of your role. This code of conduct must be adhered to at all times, and you must read, sign and return as acceptance of your commitment to it. If you have any questions, please contact the Designated Safeguarding Officer.

Staff, workers and volunteers must abide by the following:

- All incidents or concerns (no matter how serious) that cause you to believe that a child, young person or adult at risk is, or likely to be, at risk of harm must be reported, including those regarding poor practice.
- Abuse can occur within many situations including the home, school and the footballing environment. Some individuals will actively seek employment or voluntary work with children, young people or adults at risk in order to harm them. As a staff member, worker or volunteer you must be observant in identifying situations where a young person needs protection.
- Child abuse; physical, emotional, neglect and in particular sexual abuse, can result in strong emotions in those facing such a situation. It is important to understand these feelings and not allow them to interfere with your judgement about any action to take.
- If it is brought to the attention of BCCF that a child joining the activities has been subject to child abuse outside the footballing environment, recognise that football can play a crucial role as part of a care plan or in improving a child's self esteem. In such instances BCCF will work with the referral agencies to ensure the child receives the appropriate support.
- Be aware that there is an increased focus on mental health when working children, young people and adults at risk and you must take part in training to help identify behaviour of this kind.
- BCCF will support any staff member, worker or volunteer who raises a safeguarding concern.
- Disclose any criminal record, caution, reprimand or warning (subject to filtering rules) whether received prior to or during the course of your employment.

The following must never be sanctioned. You should never:

- Share a room with any under 18's.
- Use your position to intimidate, bully, threaten, discriminate against, coerce or undermine children, young people, adults at risk, volunteers or staff.
- Engage in rough, physical or sexual provocative games, including horseplay.
- Allow or engage in any form of inappropriate touching or sexual relationships.

- Allow children to use inappropriate language unchallenged.
- Make sexually suggestive comments to a child, even in fun.
- Reduce a child to tears as a form of control.
- Take a child to your home where they will be alone.
- Carry out your duties whilst under the influence of alcohol, drugs or solvents.
- Possess any indecent images of children.
- Allow allegations made by a child to go unacknowledged, unchallenged, unrecorded or not acted upon.
- Do things of a personal nature for children or vulnerable adults that they can do for themselves. Staff should avoid taking on any caring responsibilities for which you are not appropriately trained and for which consent forms have been obtained.

As an employee of BCCF, you will act in accordance with this Safeguarding Code of Conduct at all times. Failure to adhere may result in disciplinary action including dismissal if appropriate. In these cases where an investigation reveals that breaches have taken place, incidents will be reported to Regulatory bodies, the Local Authority and/or the police if appropriate.

**I confirm that I have read and understood BCCF's Safeguarding Code of Conduct and agree to abide by its contents.**

**Name:**

**Signature:**

**Date:**



**Appendix 3 - Parental Consent Form**

**Parental/Guardian Consent Form**

**1. Child or young person's details:**

Name:	
Home Address:	
	Postcode:
Number:	Email:
Date of Birth:	

**2. Parent/Guardian's details:**

Name:	
Home Address:	
	Postcode:
Number:	Email:
Date of Birth:	

**3. If there's an emergency, please contact (only complete if different from the named above):**

Name:	
Home Address:	
	Postcode:
Number:	Email:
Date of Birth:	

**4. Child/young person's medical details:**

GP:	
Address:	
	Postcode:
Number:	Email:

**5. Any extra help we need to provide (for example because of a disability):**

**6. Do we need to know about any medical conditions or allergies? If yes, please provide details for the condition(s) any any medication needed:**

**7. Is there anything else you think we should know?**

**Information for parents and guardians**

Bradford City Community Foundation aims to provide a safe and enjoyable experience for every child or young person.

To help us do this, please note the following important information.

- All questions on the consent form must be completed and signed by the parent or guardian before any child takes part.
- Parents and guardians must ensure they notify us of any changes to the information given on the form.
- Parents and carers must make arrangements for children to be brought to and from the activity safely and on time. If a parent or guardian is not able to collect their child, they need to let us know in advance who will be doing so.
- We cannot take responsibility for any damaged clothing and/or personal items during the activity.
- Parents and guardians should ensure children have sufficient water, food, clothing, sun lotion and medication (where appropriate) for the duration of the activity.

I agree to (please tick):

- My child taking part in the stated activity
- BCCF keeping a record of this form for health and safety reasons
- Any medical treatment that my child may need being given in an emergency
- My child being filmed or photographed during the activity, with the possibility that these photographs/media recordings may be used for publications or marketing purposes/

*Note: If consent is not given, BCCF will not use any images taken during the activity that contain the child/young person.*

I understand that my child needs to follow the behaviour code and any safety rules so that BCCF can keep them and other children safe.

**Name:**

**Signature:**

**Date:**

## Appendix 4 - Forms of Abuse

### Bullying

Repeated behaviour intended to intimidate or upset someone and/or 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, physically hurting someone or damaging their possessions.

### Child Exploitation & Child Sexual Exploitation

All staff to be aware that safeguarding incidents/behaviours can occur outside of school or college or be associated with outside factors. CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Missing education can also be a sign of CCE, including involvement in County Lines.

### County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other forms of "deal line". They are likely to exploit children and adults at risk to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons. Child Criminal Exploitation is common in county lines and occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology. Criminal exploitation of children is broader than just county lines, and includes for instance children forced to work on cannabis farms or to commit theft.

### Cyberbullying

The use of technology to harass, threaten, embarrass, humiliate, spread rumours or target another person. By definition, it occurs among children. When an adult is the victim, it may meet the definition of cyber harassment or cyberstalking. Bullying as a result of any form of discrimination; motivated by a prejudice against certain people or groups of people. This may be because of an individual's ethnic origin, colour, nationality, race, religion or belief, gender, gender reassignment, sexual orientation or disability. Actions may include unfair or less favourable treatment, culturally insensitive comments, insults and 'banter'.

### Domestic Violence

Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged sixteen or over, who are or have been intimate with partners or family members regardless of gender or sexuality. This can encompass but is not limited to psychological, physical, sexual, financial, emotional abuse and so called 'honour' based violence. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result".

### Fabricated or Induced Illness

Fabricated or induced illness is easiest understood as illness in a child which is fabricated by a parent or person in loco parentis. The child is often presented for medical assessment and care, usually persistently, often resulting in multiple medical procedures. Acute symptoms and signs of illness cease when the child is separated from the perpetrator.

## Female Genital Mutilation (FGM)

All staff should be aware of the Serious Crime ACT 2015 and the amendments in regards to Female Genital Mutilation (FGM). As amended by sections 73 and 74 of the Serious Crime Act 2014, there are provisions for FGM protection orders and the legal duty for regulated social care, health professionals and teachers to make a report to the police if a girl under 18 tells them she has undergone an act of FGM, or if they observe physical signs that a girl under 18 has undergone FGM.

## Forced Marriage

A marriage in which one or both spouses do not (or in the case of some adults with learning or physical disabilities or children, cannot) consent to the marriage and duress is involved. Duress can include physical, psychological, financial and sexual pressure. A Forced Marriage is different from an arranged marriage, which is a marriage entered into freely by both parties, although their families take a leading role in the choice of partner. The Anti-Social Behaviour, Crime and Policing Act 2014 made it a criminal offence (which can result in a sentence of up to 7 years in prison) to force someone to marry.

## Grooming

Grooming is defined as developing the trust of an individual and/or their family for the purposes of sexual abuse, sexual exploitation or trafficking. Grooming can happen both online and in person.

## Hazing

Any rituals, initiation activities, action or situation, with or without consent, which recklessly, intentionally or unintentionally endangers the physical or emotional well-being of vulnerable groups.

## 'Honour-Based' Abuse

Shift from so-called 'honour-based' violence to include incidents or crimes committed to protect or defend the honour of the family and/or the community. Incorporates FGM, forced marriage, breast ironing and similar. Wider definition than the previous violence based model similar to the shift in perception of domestic abuse rather than just domestic violence.

## Infatuations

Vulnerable groups may develop an infatuation with a member of staff who works with them. Such situations should be handled sensitively to maintain the dignity and safety of all concerned. Staff should be aware that in such circumstances, there is a high risk that words or actions may be misinterpreted and that allegations could be made against staff. Staff should therefore ensure that their own behaviour is above reproach. A member of staff who becomes aware that a child or adult at risk may be infatuated with him/her, or with a colleague, should discuss this at the earliest opportunity with the DSO (or the Club Senior Safeguarding Manager in his/her absence).

## Peer-on-Peer Abuse

Children and young people can be taken advantage of or harmed by adults and by other children. Peer-on-peer abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children and within children's relationships (both intimate and non-intimate). All incidents of this and sexting will be followed up. There is an inappropriate images policy in place at the club. Definition now widened to include bullying/cyberbullying, upskirting and abuse within intimate partner relationships.

## Poor practice

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