



# SAFEGUARDING CHILDREN POLICY

Portsmouth Football Club | Fratton Park, PO4 8RA



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**BOARD MEMBER WITH RESPONSIBILITY FOR SAFEGUARDING**

Andy Redman

**GENERAL COUNSEL FOR THE TORNANTE COMPANY LLC**

Val Cohen

**SAFEGUARDING POLICY APPROVED BY THE BOARD OF DIRECTORS**

August 2023

ANDREW CULLEN, CEO

Portsmouth FC  
Fratton Park  
Frogmore Road  
Portsmouth  
Hampshire PO4 8RA  
+44 (0)345 646 1898

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## 1. KEY SAFEGUARDING CONTACTS FOR THE CLUB

The operational delivery of safeguarding is coordinated by our Senior Safeguarding Manager and is supported through designated safeguarding officers in various departments. Each DSO is responsible for providing expertise and supporting the promotion and awareness raising of safeguarding.

### SENIOR SAFEGUARDING MANAGER

**EMMA SMITH**

[emmasmith@pompeyfc.co.uk](mailto:emmasmith@pompeyfc.co.uk)

07824 415959

Our Senior Safeguarding Manager is the key point of contact should any safeguarding concerns arise within the club at any time including match days or when events take place on site. This can be directly or via designated safeguarding officers from the relevant department.

### DESIGNATED SAFEGUARDING OFFICERS

Designated safeguarding officers are responsible for ensuring safeguarding is a key priority within their own departments as well as being a point of contact should any safeguarding concerns. DSO's have a duty to accurately record safeguarding concerns or allegations and report them to the club Safeguarding manager.

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## ACADEMY

**Amy Green** – [amygreen@pompeyfc.co.uk](mailto:amygreen@pompeyfc.co.uk)

The Academy Designated Safeguarding Officer is the lead point of contact should any concerns arise within the Academy and is responsible for maintaining accurate records of any safeguarding incidents or concerns within this department and discussing these with the Senior Safeguarding Manager on a regular basis.

The Senior Safeguarding Manager and Academy DSO will work closely together in regard to safeguarding within this department.

## HOSPITALITY

**Michelle Alders**- [michellealders@pompeyfc.co.uk](mailto:michellealders@pompeyfc.co.uk)

## MEDIA/COMMERCIAL

**Neil Weld**- [neilweld@pompeyfc.co.uk](mailto:neilweld@pompeyfc.co.uk)

## POMPEY IN THE COMMUNITY

Pompey in the Community are PFC's charitable partner with whom the club has a very close working relationship.

PITC has its own comprehensive safeguarding policies and procedures in place.

For match-day activities or other club-related activity, all staff working in PITC will operate according to the club's safeguarding policy and procedures where necessary.

**Clare Martin**- [clare.martin@pompeyitc.org.uk](mailto:clare.martin@pompeyitc.org.uk)



## POMPEY WOMEN & POMPEY HISTORY SOCIETY

Both Pompey Women and Pompey History Society agree to adopt the clubs safeguarding policies and procedures where appropriate within the organisations.

**Bill Griffiths-** [pfcladiesclubsec@gmail.com](mailto:pfcladiesclubsec@gmail.com)

**If you wish to send an e-mail to the club in relation to safeguarding but do not want to direct this to a particular individual, please use the below contact email address**

[safeguarding@pompeyfc.co.uk](mailto:safeguarding@pompeyfc.co.uk)

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## 2. STATEMENT FROM THE BOARD

**ANDREW CULLEN, CEO**

**‘The Board, Directors, CEO and Senior Management at Portsmouth Football Club are fully committed to the safeguarding and welfare of children, young people and adults at risk.**

**We acknowledge and accept that we have a responsibility for the safety and well-being of children, young people or adults at risk that take part in any activity at our club. Children, young people and adults at risk all have the right to be protected from abuse, regardless of their gender, race, disability, sexual orientation, religion, belief or age.**

**All staff, players and volunteers are expected to share our commitment and to promote and support the establishment of a safe, enjoyable and inclusive environment for everybody.**

**Safeguarding is everyone’s business and we will do our utmost to establish a culture of safeguarding vigilance across Portsmouth Football Club”.**

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### 3. POLICY STATEMENT

- This policy states the current commitment of Portsmouth FC in regard to safeguarding of children and young people.
- Portsmouth Football Club has a role to play in safeguarding the welfare of all children and young people by protecting them from physical, sexual, or emotional harm and from neglect or bullying.
- We acknowledge that every child or young person who plays or participates in football should be able to take part in an enjoyable and safe environment and be protected from poor practice and abuse. Portsmouth Football Club recognises that this is the responsibility of every adult involved in our club.
- We believe everyone has a responsibility to promote the welfare of all children and young people to keep them safe and practise in a way that protects them.
- We are committed to ensuring that any club related activity will be in a safe environment, where children and young people are protected from harm or abuse whilst under our care.

Portsmouth Football Club will meet its commitment to keeping children safe by;

- Listening to them and respecting them
- Appointing a Senior Safeguarding Manager and a member of the board (who will take the lead responsibility for Safeguarding)
- Making sure all staff and volunteers understand and follow the safeguarding procedures.
- Ensuring children, young people and their families know about the Club's safeguarding policies and what to do if they have a concern.
- Building a safeguarding culture where staff, volunteers, children and adults at risk know how they are expected to behave and feel comfortable about sharing concerns.





#### 4. POLICY AIMS

- To ensure that regardless of age, gender, religion or beliefs, ethnicity, disability, sexual orientation or socio-economic background, all children, young people, and vulnerable adults have a positive and enjoyable experience with all their activities given by the football club.
- To demonstrate the club's commitment to safeguarding of children and young people
- To promote best practice around safeguarding.
- To encourage a partnership between parents/carers of children associated with the club.
- To ensure all children feel safe in all our activities.
- Provide relevant safeguarding guidance and training for staff, players and volunteers.
- Allow staff/volunteers to make informed and confident responses to specific safeguarding issues.

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## 5. KEY PRINCIPLES

There are six key principles of the clubs safeguarding policy, these are;

- The welfare of children and young people is and must always be, the paramount consideration and the club will ensure a child centred approach at all times.
- All children and young people have a right to be protected from all forms of abuse and discrimination regardless of their age, sex, gender reassignment, ability or disability, race, nationality or racial origin, religion or belief, culture, language, heritage, or sexual orientation.
- If a disclosure of a safeguarding issue is made to a club staff member, an assurance of confidentiality cannot be given. We have a duty to report concerns, explain to the individual that you will need to tell some people, but only those whose job it is to protect them.
- All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately.
- Good staff training is vital to ensure staff protect both children and themselves effectively, including types of abuse (see Appendix 1)
- Working in partnership with other organisations, children, young people and their parents/carers is essential.

**The club recognises that ensuring these six key principles are followed is the responsibility of every adult involved in the club.**



## 6. DEFINITIONS

### Safeguarding children and young people

- The action taken to promote their welfare and protect them from harm.  
This means the process of protecting children and young people from abuse and maltreatment, preventing harm to their health or development, ensuring they grow up with the provision of safe and effective care and taking action to enable them to have the best outcomes.

### Children and young people

- Any person under the age of 18.
- **Staff**
- Refers to all those working for or on behalf of the club, full time or part time, temporary or permanent, in either a paid or voluntary capacity.

### Activity

- Any activity or series of activities, arranged by or in the name of Portsmouth Football Club, for children or young people to be attended by these individuals.

### DSO

- Designated Safeguarding Officer

### CEO

- Chief Executive Officer

### SSM

- Senior Safeguarding Manager

### PITC

- Pompey in the Community

### PFCW

- Portsmouth Football Club Women's Team

### PHS

- Pompey History Society



## SAFEGUARDING CHILDREN AND YOUNG PEOPLE POLICY

### 7. INTRODUCTION

- This policy covers children and young people who are either playing for the club, attending matches at Fratton Park or other designated home grounds (e.g., training ground) or involved in other activity at the club.
- We acknowledge that every child or young person who plays or participates in football should be able to take part in an enjoyable and safe environment and be protected from poor practice and abuse. Portsmouth Football Club recognises that this is the responsibility of every adult involved in our club.
- The club's safeguarding policy and procedures shall also apply to any external agencies or contractors that work on site on behalf of the club. A summary of the six key principles and club safeguarding information will be given to any contractor on commencement of a job or role.

The club shall be made aware of recruitment procedures for any agency contracted to provide services to the club and must be satisfied that safeguarding forms a key part of their recruitment processes.

- The club will strive to achieve a culture in which safeguarding practice is understood, discussed openly and for all involved with the club to be aware of the role they have in ensuring that all children, young people, themselves and their colleagues are kept safe from harm.

The statutory guidance, '[Working Together to Safeguard Children](#)', states that "anyone who has concerns about a child's welfare should make a referral to local authority children's social care and should do so immediately if there is a concern that the child is suffering significant harm or is likely to do so."

This guidance does not pose an absolute legal requirement to comply, but it does require organisations to take it into account and, if they depart from it, to have clear reasons for doing so.



## 8. RESPONSIBILITY OF SAFEGUARDING

- Report your concerns about the welfare of a child or young person. Safeguarding is everyone's responsibility if you are worried about a person it is important that you report your concerns – no action is not an option.
- To ensure best practice at all times, staff must be fully aware of this safeguarding policy and procedures and their responsibilities. All staff have a duty of care to keep children safe; this can be exercised through the development of considered, respectful, caring and professional practice.
- All safeguarding concerns should be reported to the Designated Safeguarding Officer for that department and then also to the Senior Safeguarding Manager. Any safeguarding concerns must be reported within 24 hours following the identification of a concern.

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## 9. POSITIONS OF TRUST

Any person responsible for a child or young person, whether solely or jointly, is in a position of trust which requires behaviour in accordance with this policy. These individuals must demonstrate maturity, integrity and a good judgment whilst working with children and adults at risk.

Examples of positions of trust include (but are not limited to):

- A head of department
- Member of community staff or volunteer
- Coaching staff
- Team manager
- Scout
- Physiotherapist
- Driver
- Learning mentor/tutor
- Any staff engaged in matchday activity that includes children or young people i.e., Stewards, supervising mascots, hospitality staff, media.

The senior Safeguarding Manager must be fully aware of the role of an appropriate adult working with children and young people.

All staff in positions of trust will be required to complete a self declaration form and they should declare if they have any ongoing or past police enquiries involving children.

The club must also be made aware of any ongoing enquiries under section 47 of the Children Act 1989 and police investigations.



## 10. STAFF TRAINING

- All staff working with children and young people will receive safeguarding training as part of their induction process and will undergo a period of supervision. They will also be provided with ongoing safeguarding training, awareness and support suitable to their role. This may include EFL online safeguarding training if appropriate for the role.
- EFL safer recruitment training will be provided to those in specific roles.
- All staff working in direct contact with children will be required to complete the FA Safeguarding Children workshop and obtain a certificate of this training.
- All details of those having achieved training both mandatory and role specific will be retained by our HR and safeguarding department.
- All DSOs are to receive detailed training on the Myconcern system and ensure this is shared with the relevant staff within their departments and that they are confident in using this to report any concerns as necessary.
- The club commits to ensure that staff are fully aware and understand their responsibilities under safeguarding legislation and are required to take relevant training and education courses in conjunction with football governing bodies.
- All staff are responsible for their own continuous professional development and should submit any queries to the Senior Safeguarding Manager.



## 11. OUR CLUB

- This policy applies to all staff and board members of the club. The Football Association's child protection regulations apply to everyone involved in football whether in a paid or voluntary capacity. Consequently, volunteers working at the club are regarded as staff members for the purposes of this policy. This policy is subject to all relevant current legislation and statutory guidance in regard to safeguarding.
- Club CEO is responsible for all aspects of the club and to ensure safeguarding is a key priority at board level reporting into the board member with the responsibility for safeguarding.
- The SSM is responsible for providing club wide leadership that assists in delivering the safeguarding strategy, vision, values, priorities and policies and to communicate this regularly to directors and heads of department or when safeguarding issues arise.
- The club have a Safeguarding consultant upon whom the CEO and safeguarding team can refer to for advice and assistance where necessary.
- Safeguarding will be a standard agenda item at all board meetings and the CEO will receive a report for this produced by the SSM.
- The SSM will lead a committee which will meet periodically to review safeguarding matters across the club, PITC, PFCW and PHS.  
The other core members of the committee will be;  
DSO of Academy  
DSO PITC or representative  
DSO PFCW & PHS or representative
- The club does not have the responsibility for investigating suspicions or allegations of abuse but, under the direction of the SSM, it will notify the appropriate agencies such as the Local Authority Designated Officer, or the EFL so that they can investigate and/or take any necessary actions. If any person, about whom an





allegation is made, is involved in football then a referral will be made to the FA Case Investigation Team.

- If there are any concerns regarding the conduct of another adult within the club, these should be reported to the Senior Safeguarding Manager or relevant Designated Safeguarding Officer.

For any concerns regarding the Senior Safeguarding Manager, these should be reported to the Chief Executive.

- The club have an online safeguarding management system called Myconcern. This enables staff to be able to report in their concerns via a web browser or the app and raises the concern to the designated safeguarding officer and senior safeguarding manager.

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## 12. SAFER RECRUITMENT

Portsmouth Football Club have a safer recruitment procedure which forms part of the main recruitment policy, to be able to reduce the risk to children and young people from any person the club employs in either a paid, agency or voluntary capacity.

- The Senior Safeguarding Manager will work closely with the Human Resources department on all aspects of safe recruitment and keeping these policies up to date.
- Any positions for work involving 'regulated activity' while working with children or young people, will be subject to a satisfactory Enhanced Disclosure Barring Service (DBS) check and appropriate references as stated below.
- The club's safer recruitment policy sets out our practice to ensure all staff and volunteers are suitable to work with children and young people. As part of our safer recruitment policy we ask every successful candidate to give their consent for us to obtain two written references and to provide us with documentary proof of qualifications.
- As part of due diligence, during the recruitment process open source searches such as social media will be completed for individuals to enable the shortlisting process
- The successful candidate will also be subject to an appropriate level of DBS check in relation to the role along with completing a self-declaration form as part of the recruitment process.
- Any offer of employment will be conditional on these requirements being satisfactory.

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### 13. PRIVATE FOSTERING

A privately fostered child is a child under the age of 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 within 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 the definition above), placed with a host family for 28 days or more is in a private fostering arrangement and therefore the club will ensure that the local authority is informed and work together with them to make sure the legislative and local procedural requirements are met.

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## 14. POOR PRACTICE

Poor practice takes place whenever staff fail to provide a good standard of care and support within their working practice and, when this is allowed to continue, can cause harm, or become abuse.

Any case of poor practice will be taken seriously and dealt with using appropriate action. It may be that a person is not aware that poor practice or abuse is taking place due to them believing the behaviour is acceptable.

The club will comply with the FA's low level concern threshold policy.

The Affiliated Football's Safeguarding Children Policy and Procedures defines poor practice as follows;

- When insufficient care is taken to avoid injuries (e.g., by excessive training or inappropriate training for the age, maturity, experience and ability of players)
- Allowing abusive or concerning practices to go unreported (e.g., a coach who ridicules and criticizes players who make a mistake during a match)
- Allowing hazing practices to go unreported.
- Placing children or young people in potentially compromising and uncomfortable situations with adults (e.g., inappropriate use by a coach of social media with a young player(s))
- Ignoring health and safety guidelines (e.g., allowing young players to set up goal posts unsupervised by adults)
- Failing to adhere to the club's codes of practice (e.g., openly verbally abusing the referee)
- Giving continued and unnecessary preferential treatment to individuals



## 15. PROTECTING CHILDREN AND YOUNG PEOPLE WITH DISABILITIES

Children and young people with disabilities are at an increased risk of being abused compared with their non-disabled peers and are also less likely to receive the protection and support they need when they have been abused.

For many years children and young people with disabilities were not considered to be vulnerable to abuse, however it is now known that this is not the case and that they are at an increased risk of abuse and the greater the disability, the greater the risk.

There are a number of factors that contribute to this, these include;

- Lack of friends and peer group to support and protect.
- Intimate, physical and/or invasive medical care required. This can make it difficult for a child or young person to know the difference between an acceptable and an unacceptable 'touch'.
- Lack of speech or limited communication, this makes it harder to report abuse.
- Multiple parent/responsible persons making it harder to identify who may be abusing.
- History of being told what to do and not given choices.
- Being dependent on the abuser for a specific or basic need.
- Having medical conditions that are used to explain injuries.

Having a disability should not and must not mask or deter an appropriate enquiry where there are child protection concerns.

To ensure our club is accessible to all, we will:

- Provide a welcoming environment for all participants.
- Implement an inclusion and equality policy.
- Take practical steps to ensure that children and young people with disabilities are appropriately and effectively included, including adapting equipment or activities where necessary.



It is important to meet with the child or young person and where necessary their parents/carers in order to;

- understand their needs, including personal or intimate care responsibilities.
- agree how the individual will be supported.
- consider their additional vulnerability.
- ensure that arrangements made address both inclusion and safeguarding requirements.

We need to ensure that children and young people with disabilities are fully protected by providing a safe environment in order to assist them to protect themselves by helping them to speak out.

Everyone must do their best to stop abuse from happening and take responsibility for observing, challenging and reporting poor practice and suspected abuse.

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## 16. RESPONDING TO DISCLOSURES, SAFEGUARDING INCIDENTS AND CONCERNS

A disclosure is the process by which a person starts to share that they have been abused with others.

This can happen in a variety of ways including:

**Directly:** Telling someone what has happened to them

**Indirectly:** Inadvertently or deliberately communicating through behaviours, emotions, art, writing, appearance, inquiries or discussions about fears, concerns, or relationships.

It is not the responsibility of anyone within Portsmouth Football Club to decide whether or not abuse has taken place.

All staff and volunteers working within the club have a responsibility to ensure the welfare and safety of all children and young people within their care and to ensure all allegations or suspicions of abuse and or poor practice are taken seriously and reported immediately.

Children and young people who may be vulnerable are likely to disclose abuse or radicalisation to those they trust and how this is responded to is crucial.

It is important to deal with the disclosure as it happens and ensure that the child or young person's needs are met and supported.

When a disclosure is made, it is important to understand that you must not investigate the disclosure yourself. The disclosure must always be taken seriously and dealt with in accordance to the guidance within the club's policies, even if the truth of the disclosure is uncertain.

- **Recognise:**

Recognising the signs of abuse or harm can be difficult.

The presence of one or more signs should not be taken as proof that abuse has or is taking place, however staff do not need proof to report a concern. A person may be



at increased risk if you fail to report a concern.

As soon as you suspect any kind of abuse or harm you should raise the concern.

- **Respond:**

Responding to abuse is vital and you have a responsibility to report any safeguarding concerns to the safeguarding team at the club.

No report of or concern about possible abuse should ever be ignored.

If a child or young person tells you they are experiencing abuse, it is important to reassure them that they have done the right thing in telling you.

It is important that you let them know that you are going to have to speak to somebody to ensure they are kept safe.

- **Report:**

Staff should ensure the immediate needs of the person disclosing are met and should prioritise their safety and protection above all else.

This may involve contacting emergency services and/or statutory services.

If the individual is not in immediate danger, you should follow the club's safeguarding policies and procedures and contact the Designated Safeguarding Officer or Senior Safeguarding Manager.

- **Record**

It is vital for staff to make a detailed record of what has been said as soon as possible after the disclosure using the person's own words, once their immediate needs and have been met and the appropriate referrals have been made.

This should include dates, times and quotes.

This will need to be recorded on the club's MyConcern system.

Staff should never:

- Make ambitious promises or promise confidentiality.
- Seek details beyond those the person willingly discloses.
- Ask leading questions.
- Give the impression that the person disclosing is to blame.





- Approach the alleged perpetrator of abuse or person whose behaviour and/or actions there are concerns about

Anyone can contact emergency services or make a referral directly to statutory agencies, particularly if they are concerned about a child or young person's immediate safety, if they are having difficulty contacting a member of the Safeguarding Team or if they are concerned that a disclosure or information about a safeguarding concern has not been acted upon appropriately.

If a child is at immediate risk of harm, please dial 999 and/or seek medical attention.

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## 17. A PROFESSIONAL AND SAFE ENVIRONMENT

- To ensure a safe environment it is essential that all staff and volunteers working with children and young people have the appropriate training in safeguarding and awareness of child protection.
- All staff should be familiar with the club's safeguarding policies and procedures and follow them at all times.
- Support will be provided to any member of staff who reports or has suspicions of a concern.
- All adults working or volunteering with children and young people are responsible and accountable for the way in which they behave towards them and every individual has the right to be treated with respect and dignity.
- Relationships between an adult staff member and child or young person must maintain clear and appropriate boundaries at all times. They should be supportive and positive towards them and aim to improve the person's skills, development and progress.
- The relationship between any adult any child or young person should focus on the respective activity/ event.
- Always work in an open environment and encourage open communication. Avoid all private and unobserved situations.
- Make the experience of the sporting activity fun and enjoyable. Promote fairness and confront and deal with any bullying situations.
- Ensure that those working with children or young people have established effective communication methods with them and this may require additional training and workforce development.
- Ensure that the child or young person's health need are known, recorded and that sufficient people know how to respond.

This may mean knowing how to manage a seizure or asthma attack and ensuring that any medication is kept to hand, administered correctly and recorded.



- Give the child or young person every opportunity to make informed choices and respect their choice.
- Always have clear strategies for dealing with any difficult behaviour that excludes any kind of physical punishment or restraint.
- Listen to and support all children and young people.
- Involve children, young people and their families wherever possible. This helps to give them a voice and may act to deter abusers.

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## 18. RECORDING INFORMATION

Please use a safeguarding referral form (this can be found within the safeguarding area on our website) to be given to the Senior Safeguarding Manager as a written record of the concern.

The details of the report must also be submitted via MyConcern by a member of staff.

If you are unable to access a form, the following information should be included with any written report:

- Provide a factual account of what you have observed or been told.
- The date and time of what you have witnessed or been told.
- Details of those involved (the person(s) whose welfare and safety there are concerns about, the alleged perpetrator of abuse or person(s) whose behaviour or actions there are concerns about, witnesses and any third party who has raised concerns)
- Action taken and your rationale for taking these actions.
- Date and time of referring the information and to whom the information was referred.
- Your details as the referrer

It is important for staff to:

- Provide clear, concise and relevant information.
- Record information in an objective and professional manner
- Record factual information rather than assumption of what you have witnessed or been told.
- Record actual words and language. Do not rephrase what you have been told or leave things like insults or intimate vocabulary out.
- Record observations, for example, a description of visible bruising or injuries. Never ask someone to remove or adjust their clothing to observe any bruising, marks or injuries.

## 19. CATEGORIES OF ABUSE- CHILDREN AND YOUNG PEOPLE

### PHYSICAL ABUSE

- Physical abuse is when someone hurts or harms a child or young person on purpose. It includes hitting with hands or objects, slapping and punching, kicking, shaking, throwing, poisoning, burning and scalding, biting and scratching, breaking bones and drowning.

Physical abuse is any way of intentionally causing physical harm to a child or young person. It also includes making up the symptoms of an illness or causing a child or young person to become unwell.

### EMOTIONAL ABUSE

- Emotional abuse is any type of abuse that involves the continual emotional mistreatment of a child or young person. It is the persistent emotional maltreatment of a child or young person such as to cause severe and adverse effects on the child's emotional development.

Emotional abuse can involve deliberately trying to scare, humiliate, isolate or ignore a child or young person.

Emotional abuse is often part of other kinds of abuse, which means it can be difficult to spot the signs or tell the difference, though it can also happen on its own.

It includes:

- Humiliating or constantly criticising a child
- Threatening, shouting at a child, or calling them names
- Making the child a subject of jokes or using sarcasm to hurt a child.
- Blaming and scapegoating
- Making a child perform degrading acts.
- Not recognising a child's own individuality or trying to control their lives.
- Pushing a child too hard or not recognising their limitations
- Exposing a child to upsetting events or situations, like domestic abuse or drug taking
- Failing to promote a child's social development.
- Not allowing them to have friends.
- Persistently ignoring them
- Being absent
- Manipulating a child



- Never saying anything kind, expressing positive feelings or congratulating a child on successes
- Never showing any emotions in interactions with a child, also known as emotional neglect.

### **SEXUAL ABUSE**

- When a child or young person is sexually abused, they are forced or tricked into sexual activities. They might not understand that what is happening is abuse or that it is wrong and they may be afraid to tell someone. Sexual abuse can happen anywhere and it can happen in person or online.

Sexual abuse is perpetrated by both men and women. Children can also abuse other children (peer on peer abuse). 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. They may also include 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

### **NEGLECT**

- Neglect is the ongoing failure to meet a child or young person's basic needs and is the most common form of child abuse.

A child might be left dirty or hungry, or without proper clothing, shelter, supervision or health care. This can put children and young people in danger and it can also have long term effects on their physical and mental wellbeing.

This is also likely to result in the serious impairment of the child's health or development.

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

### **GROOMING**



- Grooming is when someone builds a relationship, trust and emotional connection with a child or young person so they can manipulate, exploit and abuse them. Children and young people who are groomed can be sexually abused, exploited, or trafficked.

It can involve communication with a child where there is an intention to commit a sex offence in person and/or online.

Grooming can take place over a short or long period of time, from weeks to years.

Groomers may also build a relationship with the young person's family or friends to make them seem trustworthy or authoritative.

### **CHILD SEXUAL EXPLOITATION**

- Child sexual exploitation (CSE) is a type of sexual abuse. The government definition of child sexual exploitation which was published in 2016 is as follows:

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

Sexual exploitation can sometimes be mistaken for normal behaviour. Knowing the signs can help protect children and young people and help them when they have no one else to turn to.

Some signs to look out for are:

- Unhealthy or inappropriate sexual behaviour
- Being frightened of some people, places or situations
- Being secretive
- Sharp changes in mood or character
- Having money or things they can't or won't explain
- Physical signs of abuse, like bruises or bleeding in their genital or anal area



- Alcohol or drug misuse
- Sexually transmitted infections
- Pregnancy

### **BULLYING**

- Bullying is behaviour that hurts someone else. It includes name calling, hitting, pushing, spreading rumours, threatening or undermining someone. It can happen anywhere and is usually repeated over a long period of time and can hurt a child or young person both physically and emotionally. It could be by an adult towards a child or peer on peer abuse. Bullying results in pain and distress to the victim and can be:
  - Emotional being unfriendly, excluding (emotionally and physically) sending hurtful text messages, tormenting (e.g., hiding football boots/shin guards, threatening gestures)
  - Physical pushing, hitting, kicking, punching or any use of violence
  - Sexual unwanted physical contact or sexually abusive comments
  - Discriminatory comments, jokes about or targeted abuse aimed towards disabled children, homophobic, transphobic, sexist, gendered, racist or faith based comments
  - Verbal name calling, sarcasm, spreading rumours, teasing

### **CYBERBULLYING**

- Cyberbullying is bullying that takes place online. Unlike bullying offline, online bullying can follow the child wherever they go via social networks, gaming and mobile phone. It is when a person uses technology to deliberately upset someone. This could take the form of posting derogatory abusive comments, videos or images on social media. Bullies often feel anonymous and 'distanced' from the incident when it takes place online and 'bystanders' can easily become bullies themselves by forwarding the information on.

### **CHILD CRIMINAL EXPLOITATION**

- Child criminal exploitation is child abuse where children and young people are manipulated and coerced into committing crimes.





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.

- The below details the definition from Keeping Children Safe in Education and the below link provides further information on child criminal exploitation

Child criminal exploitation “occurs where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in... criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. “

“They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.”

#### **DOMESTIC ABUSE**

- Domestic abuse is any type of controlling, bullying, threatening or violent behaviour between people in a relationship.

It can seriously harm children and young people and witnessing domestic abuse is child abuse.

It is important to remember, domestic abuse:

- Can happen inside and outside the home
- Can happen over the phone, on the internet and on social networking sites
- Can happen in any relationship and can continue even after the relationship has ended
- Both men and women can be abused or abusers

#### **FEMALE GENITAL MUTILATION (FGM)**

- FGM is when a female’s genitals are deliberately altered or removed for non-medical reasons.

FGM is a form of child abuse, it is dangerous and a criminal offence in the UK.

The procedure has no health benefits for girls and women.

The Female Genital Mutilation Act makes it illegal to practise FGM in the UK or to take women and girls who are British nationals or permanent residents of the UK abroad for FGM whether or not it is lawful in another country.

## CHILD ON CHILD ABUSE

- Children can abuse other children.

This is most likely to include, but may not be limited to:

- Bullying (including cyberbullying)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- Sexual violence, such as rape and sexual assault
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse
- 'Upskirting', which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Sexting (also known as youth produced sexual imagery)
- Initiation/hazing type violence and rituals

## CHILD ON CHILD SEXUAL VIOLENCE AND SEXUAL HARASSMENT

- Sexual violence and sexual harassment can occur between two or more children of any age and sex.. It can occur also through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face-to-face (both physically and verbally) and are never acceptable.
- Children who are victims of sexual violence and sexual harassment wherever it happens, may find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same environment.

## SEXUAL VIOLENCE

Keeping Children Safe in Education 2022 refers to sexual violence under the Sexual Offences Act 2003 [132] as described below:



## **Rape:**

### **Assault by Penetration**

### **Sexual Assault:**

### **Causing someone to engage in sexual activity without consent**

**What is consent?** Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another. Consent can be withdrawn at any time during sexual activity and each time activity occurs.

- A child under the age of 13 can never consent to any sexual activity;
- The age of consent is 16[135];
- Sexual intercourse without consent is rape.

## **SEXUAL HARASSMENT**

Keeping Children Safe in Education refers to Sexual harassment as 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/college. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- Sexual comments
- Sexual "jokes" or taunting;
- Physical behaviour
- Displaying pictures, photos or drawings of a sexual nature;
- Upskirting
- Online sexual harassment that may include:
  - Consensual and non-consensual sharing of nude and semi-nude images and/or videos. [138] Taking and sharing nude photographs of U18s is a criminal offence.



- Sharing of unwanted explicit content;
- Sexualised online bullying;
- Unwanted sexual comments and messages, including, on social media;
- Sexual exploitation; coercion and threats; and
- Coercing others into sharing images of themselves or performing acts they're not comfortable with online.

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Portsmouth  
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## 20. DISCRIMINATION TOWARDS CHILDREN OR YOUNG PEOPLE

Discrimination is when someone is treated unfairly or differently.

Abusive or bullying behaviour because of discrimination occurs when motivated by a prejudice against certain people or groups of people. This may be because of an individual's ethnic origin, colour, nationality, race, religion or belief, gender, gender reassignment, sexual orientation or disability.

Actions may include unfair or less favourable treatment, culturally insensitive comments and/or insults. Discriminatory behaviour is unacceptable and will be reported to The FA. This includes incidents on and off the pitch (including social media). 'Banter' will be considered as unacceptable and dealt with appropriately.

Poor practice: This is behaviour that falls short of abuse but is nevertheless unacceptable

## 21. HAZING

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

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## 22. RADICALISATION

Radicalisation is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups. The process of radicalisation is different for every individual and can take place over an extended period or within a very short time frame.

Anybody from any background can become radicalised. The grooming of children and young people for the purposes of involvement in extremist activity is a serious safeguarding issue.

The process of radicalisation may involve:

- Being groomed online or in person
- Exploitation, including sexual exploitation
- Psychological manipulation
- Exposure to violent material and other inappropriate information
- The risk of physical harm or death through extremist acts

## 23. EXTREMISM

This goes beyond terrorism and includes people who target the vulnerable, including the young, by seeking to sow division between communities on the basis of race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in our society.

Extremism is defined in the Counter Extremism Strategy 2015 as the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs.

Calls for the death of members of our armed forces is classed as extremist.



## 24. PREVENT

Portsmouth Football Club have a responsibility to ensure that we keep all children and young people protected and safe from harm. This includes becoming radicalised and/or being exposed to extreme views.

The 'Prevent duty' is the duty in the Counter-Terrorism and Security Act 2015 on specified authorities, in the exercise of their functions, to have due regard to the need to prevent 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.

The club adopt the policy strategy laid down by the law to ensure the safeguarding of all.

Refer to the club's 'Prevent Procedure' for further information

## 25. NUDE IMAGE SHARING

Nude image sharing is when people share a sexual message and/or a naked or semi-naked image, video or text message with another person. It is also sometimes referred to as 'sexting'.

Portsmouth football club are committed to raising awareness of the issues surrounding nude image sharing and supporting anyone who has been involved in sexting incidents.

If a child or young person makes a disclosure about nude image sharing or if they have any concerns that an individual has been involved in a sharing incident, this should be reported immediately to a DSO or the SSM.

It is a criminal offence to create or share explicit images of a child, even if the person doing it is a child.



## 26. INFATUATIONS

Children and young people 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 young person may be infatuated with him/ her, or with a colleague, should discuss this at the earliest opportunity with a member of the club's safeguarding team.

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## 27. NON-RECENT ABUSE

Non-recent abuse, sometimes known as historic abuse, is when an adult was abused as a child or young person under the age of 18 and relates to an incident which took place at this time.

Allegations of child abuse are sometimes made by adults and children many years after the abuse has occurred. There are many reasons for an allegation not being made at the time, including fear of reprisals, the degree of control exercised by the abuser, and shame or fear that the allegation may not be believed.

Reports of non-recent concerns or allegations of abuse may be complex, as the alleged victims may no longer be living in the same situation where the abuse occurred and/or the whereabouts of the alleged respondent may be unknown.

All cases should be responded to in the same way as any other safeguarding concern or allegation.

The effects can be short term but sometimes they last into adulthood. If someone has been abused as a child, it is more likely that they will suffer abuse again. This is known as revictimisation.

The long-term effects of abuse and neglect can include:

- Emotional difficulties like anger, anxiety, sadness, or low self-esteem
- Mental health problems like depression, eating disorders, self-harm or suicidal thoughts
- Problems with drugs or alcohol
- Disturbing thoughts, emotions and memories
- Poor physical health
- Struggling with parenting or relationships.



## 28. CONFIDENTIALITY

All disclosures, safeguarding incidents and allegations must be taken seriously, and every effort should be made to ensure that confidentiality is maintained for all concerned. Confidentiality is an important principle that enables people to feel safe in sharing their concerns and to ask for help. However, the right to confidentiality is not absolute. Sharing relevant information with the right people at the right time is vital to good safeguarding practice.

Information must never be used to intimidate, humiliate or embarrass children or young people.

Confidential information about a child or young person should never be used casually in conversation or shared with any other person other than on a need-to-know basis.

In circumstances where the child or young person's identity does not need to be disclosed, the information should be used anonymously.

There are some circumstances in which an employee, casual worker or volunteer may be expected to share information about a child, for example when abuse is alleged or suspected.

In such cases, individuals have a duty to pass information on without delay, but only to those with designated safeguarding responsibilities.

All staff and volunteers are expected to treat information they receive about children and young people in a discreet and confidential manner.

They should also seek advice from a member of the safeguarding team including the Senior Safeguarding Manager if they are in any doubt about sharing information they hold, or which has been requested of them.

The GDPR and Data Protection Act 2018 do not prevent, or limit, or sharing of information for the purposes of keeping children and young people safe.

Those who need to know are those who have specific responsibilities to support and protect the child and/ or any others that may be at risk, for example, statutory agencies, the EFL safeguarding team, the FA, parents and carers.



## 29. ALLEGATIONS AGAINST STAFF

Any allegations or concerns against staff or volunteers will be taken seriously by Portsmouth Football Club and responded to in a way that ensures the protection and needs of children and young people are of the first priority.

This procedure will always be followed in respect of all cases where it is alleged that a staff member of volunteer has:

- Behaved in a way that as, or may have, harmed or possibly committed a criminal offence against, or related to, a child or young person.
- Behaved in a way that indicates that the individual is unsuitable to work with children and young people. This can include behaviour within their personal life which raises safeguarding concerns.
- The club will always inform the police when information is received that indicates a criminal law has been, or may have been, broken. In addition to this, the club will inform other statutory and regulatory authorities/ agencies when required to do so or when the circumstances regarding the allegations are such that the authorities/ agencies should be notified.
- The club will work with openness and transparency with all authorities and agencies.
- The Senior Safeguarding Manager will have full oversight over any allegations against staff members or volunteers working with children and young people and will inform the Chief Executive and HR Manager at each stage of any allegation or concern. The Senior Safeguarding Manager will hold full safeguarding management responsibility and the HR Manager will hold responsibility for advising on all aspects of the HR processes.
- There may be circumstances when this policy and procedures may be used concurrently with other procedures such as disciplinary, whistleblowing or complaints.

In this event, the safeguarding process will take priority and other processes may be suspended while the safeguarding processes are completed.

In circumstances where a whistleblowing event or another complaint is made in which the safeguarding concerns or allegations against a staff member or volunteer are a minor element, the safeguarding concerns must still be addressed using this policy and procedure which may delay other processes taking place.



- Portsmouth Football Club recognises that children, young people and some employees may have disabilities which may require reasonable adjustments to be made to this procedure in accordance with The Equality Act 2010. In these cases, the Senior Safeguarding Manager will make these adjustments in consultation and agreement with the HR Manager.

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Portsmouth  
Hampshire PO4 8RA  
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### 31. LOW LEVEL CONCERNS

A low-level concern is any concern about an adult's behaviour towards a child or young person that does not meet the allegation threshold or is not otherwise serious enough to consider a referral to the Local Authority Designated Officer (LADO) and other statutory agencies.

It is different to an allegation against staff and whistleblowing as mentioned above.

A low-level concern, no matter how small, and even if no more than a 'nagging doubt', is a sense of unease as to the adult's behaviour particularly towards or around children or young people.

The adult has acted in a manner that:

- Is not consistent with our Clubs' Safeguarding Policies and Procedures and code of conduct and/or
- Relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children or young people.

It is not the responsibility of a staff member to determine whether the concern is of a low-level or if it is in fact serious enough to refer to the LADO.

Once staff share what they believe to be a low level concern, that determination should be made by the Designated Safeguarding Officer along with the Senior Safeguarding Manager.



### 31. ONLINE SAFETY

We know that the online world can add great value to the lives of children and young people; whether it being personally or educationally.

Online safety is being aware of the nature of the possible threats that you could encounter whilst engaging in activity through the internet.

Being safe online means individuals are protecting themselves and others from online harms and risk which may jeopardise their personal information, lead to unsafe communications or even effect their mental health and wellbeing.

The club will ensure that there is effective arrangements to: always act in the best interests of children and young people to protect them online and offline.

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Portsmouth  
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## 32. APPENDICES

### LIST OF APPENDICES

#### APPENDIX 1

Signs and indicators of abuse

#### APPENDIX 2

Other applicable club policies to be read in conjunction with the Safeguarding policy

#### APPENDIX 3

Additional documents- legislation and statutory guidance

#### APPENDIX 4

Other key safeguarding contacts

#### APPENDIX 5

Safeguarding referral form



## APPENDIX 1

### Signs and indicators of abuse:

#### Children and young people

Many of the signs that a child is being abused are the same regardless of the type of abuse. Anyone working with children and young people need to be able to recognise the signs these include:

- Being afraid of particular places or making excuses to avoid particular people
- Knowing about or being involved in 'adult issues' which are inappropriate for their age or stage of development, for example alcohol, drugs and/or sexual behaviour
- Having angry outbursts or behaving aggressively towards others
- Becoming withdrawn or appearing anxious, clingy, or depressed
- Self-harming or having thoughts about suicide
- Showing changes in eating habits or developing eating disorders
- Regularly experiencing nightmares or sleep problems
- Regularly wetting the bed or soiling their clothes
- Running away or regularly going missing from home or care
- Not receiving adequate medical attention after injuries.





## APPENDIX 2

Portsmouth football club have safeguarding policies for man activities within the club. The below list is typical, but not comprehensive:

- Anti-bullying policy
- Whistleblowing policy
- Health and safety policy
- Trips tours and tournaments policy
- Transport policy
- Late collection of children policy
- Acceptable I.T use policy
- Social media policy
- Information sharing/data protection policy
- Equal opportunities policy
- Photography/ image consent policy
- Safer recruitment policy
- Lone working policy

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### APPENDIX 3

Relevant legislation and statutory guidance:

- Working Together to Safeguard Children 2018
- The Children Act 1989 and 2004
- Education Act 2002
- Keeping Children Safe in Education 2022
- Health and Safety at Work Act 1974
- Management of Health and Safety at Work Regulations 1999
- Modern Slavery Act 2015
- Counter Terrorism and Security Act 2015
- Private Fostering Regulations 2005
- Female Genital Mutilation Act 2003
- General Data Protection Regulations 2018
- SEN Code of practice guidance 2015
- FA Safeguarding children rules
- FA Respect Codes of Conduct
- Human rights act 1998
- Crime and disorder act 1998
- Protection of Children Act 1999
- Protection of Freedoms Act 2012
- Rehabilitation of Offenders Act 1974
- Safeguarding Vulnerable Groups Act 2006
- Sex Offenders Act 1997
- Sexual Offences Act 2003
- Youth Evidence and Crime Evidence Act 1999
- What to do if you are worried about a child being abused 2015

**PLEASE NOTE THIS LIST IS NOT EXHAUSTIVE**

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## APPENDIX 4

Key Safeguarding Contacts:

**Portsmouth Football Club Senior Safeguarding Manager:**

Emma Smith: 07824 415959

**The EFL Safeguarding Team:**

01772 325490

[safeguarding@efl.com](mailto:safeguarding@efl.com)

**The Football Association/NSPCC**

Safeguarding Children & Vulnerable Adults Helpline

Tel: 0808 800 5000

Text phone for Deaf Users. Tel 0800 056 0566

[safeguarding@fa.com](mailto:safeguarding@fa.com)

**Portsmouth City Council Children's Social Care and Safeguarding:**

02392 882500

[LADO@portsmouthcc.gov.uk](mailto:LADO@portsmouthcc.gov.uk) Local Authority Designated Officer

**Police:**

If an emergency or if someone is in danger call 999 (101 for non-emergencies)

**NSPCC:**

Contact the NSPCC helpline by calling 0808 800 5000

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## APPENDIX 5

### SAFEGUARDING REFERRAL FORM

FOR REPORTING OF CONCERNS/DISCLOSURES BY STAFF, VOLUNTEERS, 3RD PARTIES AND CONTRACTORS EMPLOYED BY THE CLUB

<b>PERSON(S) WHOSE SAFETY AND/OR WELFARE THERE ARE CONCERNS ABOUT</b>	
Please provide known details of the alleged victim(s)/person(s) whose safety and/or welfare there are concerns about	
Forename and surname	
Date of birth/estimated age	
Relationship to the Club	
Address (if known)	
If a child, please add the parents name and contact number	
<b>DETAILS OF THE PERSON(S) WHOSE ACTIONS OR BEHAVIOUR THERE ARE CONCERNS ABOUT</b>	
Forename and surname	
Date of birth/estimated age	
Relationship to the Club (if applicable)	

<b>DETAILS OF THE DISCLOSURE, INCIDENT OR CONCERN</b>	
Name of the person reporting the concern	
Date	
Time	
Location	
Role at the club (if applicable)	
Who you are referring to (SSM or DSO details)	
Are any other agencies involved? I.e police, social services	
Signed and Dated	
<p style="text-align: center;"><b>Concern:</b></p> <ul style="list-style-type: none"> <li>• Please be clear which details are fact and which are speculation</li> <li>• Please include as much information as possible, clear, concise and relevant information</li> </ul>	



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**FOR COMPLETION BY SSM or DSO (where applicable)**

Follow up actions	
Signed and dated	
Position	

Approved By	Version	Issue date	Review date	Contact person
	1	June 2023	June 2024	Emma Smith- Senior Safeguarding Manager

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Fratton Park  
Frogmore Road  
Portsmouth  
Hampshire PO4 8RA  
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