



Policy Title: Safeguarding and Child Protection Policy

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| Originators: | Scott Murphy, Mark Houghton |
| Approved by and when: | Sharks Committee, August 2023 |
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Key facts

The safeguarding and well-being, including mental health, of our players is our number one priority

Safeguarding and promoting the welfare of children is everyone's responsibility

We operate within a culture of openness and recognise that abuse may occur in any organisation

We are a 'sharing organisation' – all concerns should be reported

All concerns about a child (including signs of abuse and neglect) must be reported immediately to the Designated Safeguarding Lead (DSL)

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Application

This Safeguarding policy applies to all coaching, support, contract staff, volunteers and any other adults working with the Singapore Sharks Football Club ("SSFC" or the "Club").

All references in this Safeguarding Policy, to "**staff**" or "**staff members**" should be interpreted as relating to the aforementioned. DSL means the Designated Safeguarding Lead for the Club.

This Safeguarding Policy applies to all players and staffing that the Club, including occasions when sessions are conducted off-site and educational visits are undertaken.

Publication

This Policy is updated periodically and is published to all volunteers. This policy is also available on the Club's communication platform.

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Contact details

The following pages outline the contact details of named staff in Club and external agencies linked to child protection and safeguarding.

| Club Contacts | |
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| Designated Safeguarding Lead (DSL) Head Coach | Michael Stones |
| Any other staff trained to DSL level | Simon Kelly, James Holmes, Willem Lampe |

| Country Authority Contacts | |
|---|---|
| Ministry of Social and Family Development | https://www.msf.gov.sg/about-MSF/our-people/Divisions-at-MSF/Social-Development-and-Support/Rehabilitation-and-Protection-Group/Pages/Child-Protective-Service.aspx |

| Police | |
|----------------------------|---------------|
| Local Police Emergency | 995 |
| Local Police non-emergency | 1800-255-0000 |

| National Contacts | |
|---|---------------|
| Child Protective Service | 1800-777-0000 |
| Ministry of Social and Family Development | 63555000 |

Part A: Aims and objectives of safeguarding in our Club

Our commitment is to safeguard and promote the welfare, health (both physical and mental) and safety of our players by creating and maintaining an open, safe, caring and supportive atmosphere. We are committed to embedding a Culture of Care in our Club, which places children and their needs at the center of our decision making.

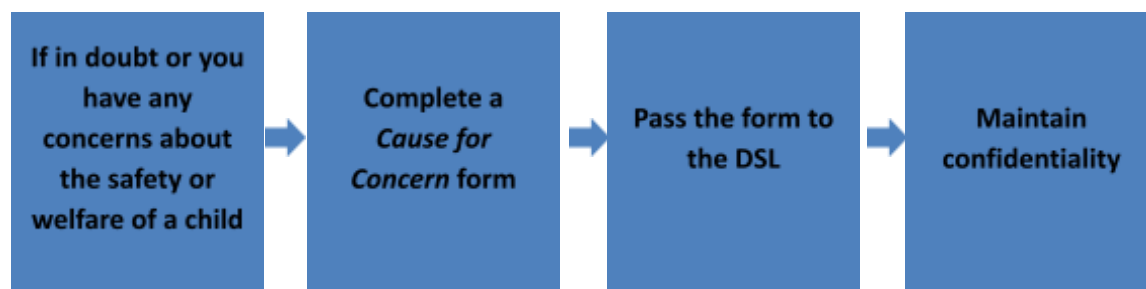
We have three primary aims:

- Prevent harm
- Protect players from harm, and
- Support players and staff when child protection and safeguarding incidents occurs

The Club achieves these aims by:

- Ensuring the recruitment of individuals who through rigorous background checks, are deemed suitable and appropriate to work with children and who have positive safeguarding attitudes;
- Providing excellent pastoral care and fostering optimism and a positive Club atmosphere where players feel secure and are encouraged to talk. Players are encouraged to find a person (whether a staff member or peer) whom they trust and to speak to that person about any issues which may be worrying them. Players are additionally reminded of specific individuals to whom they are able to talk;
- Valuing and promoting effective relationships with parents and professionals from other statutory or support service agencies;
- Ensuring that children are safeguarded from potentially harmful and inappropriate online material through embedding a whole Club approach towards online safety, including the acceptable use of mobile technology
- Ensuring that all staff are properly trained, supported and supervised to enable them to identify abuse and welfare concerns and deal with such concerns appropriately and sensitively;
- Encouraging staff to discuss child protection, safeguarding and welfare concerns confidentially with the DSL in order to ensure they have confidence in their own abilities to identify and appropriately handle welfare concerns and cases of abuse and neglect;
- Creating a culture of openness, trust and transparency in which any concerns about the conduct of staff, visitors and other adults (parents, visitors, contractors etc) in Club can be shared and dealt with in an appropriate and sensitive manner and
- Following the procedures laid down in this Policy on a best endeavors / practice basis.

Part B: Actions where there are concerns about a child



Safeguarding is everyone's responsibility

Safeguarding is everyone's responsibility and all staff, regardless of their role, should exercise vigilance and be watchful for, and aware of, signs that a child may be in need of help as well as the signs of abuse and neglect. If a staff member has any concerns about a child, he/she should complete a 'Cause for Concern' form and hand it to the DSL. The DSL will discuss the matter with the member of staff and will decide on an appropriate course of action. This discussion and actions taken will be recorded on a Cause for Concern Form.

Early help and intervention

All staff should be aware of the early help process, and understand their role in it. This includes:

- identifying emerging problems and potentially unmet needs; (physical, learning, social and / or emotional)
- liaising with the DSL;
- sharing information with other professionals, internal and external, to support early identification and assessment; and
- In some cases, acting as the lead professional in undertaking an assessment of the need for early help.

All staff should be alert to identifying children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life. If a member of staff has a concern that a child may be in need of early help then s/he should, in the first instance, discuss early help requirements with the DSL.

Effective early help in a Club setting involves the Club (under the guidance of the DSL) providing high quality support, in cooperation with or coordinating other agencies as appropriate, to help address the assessed needs of the child and their family early, in order to significantly improve the outcomes for the child. It is hoped that in each early help assessment case this approach will improve the welfare of the children involved. However, each case should be subject to regular review, and consideration should be given to a possible referral to the Child Protective Service or the police if the child's situation does not appear to be improving.

Child in need¹, suffered or at risk of significant harm or in immediate danger

If at any time it is considered that the child may be a child in need, has suffered or is at risk of significant harm, or is in immediate danger, the DSL should be informed immediately and the DSL may make a referral immediately to the Child Protective Service or in cases of significant harm or immediate danger the police.

¹ ● Children in need are defined in law as children who are aged under 18 and:
● need local authority services to achieve or maintain a reasonable standard of health or development;
● need local authority services to prevent significant or further harm to health or development;
● are disabled.

A child's wishes

A child's wishes and feelings should be taken into account when determining what action should be taken and what support services to provide. Systems are in place in the Club for children to express their views and give feedback to Club staff, regarding any safeguarding or child protection concern. These support systems operate with the best interests of the child at their heart.

Reporting and handling a concern

When reporting and/or handling a concern about a student, all staff should act with the utmost discretion and any additional players who are involved will receive appropriate care and support. Staff should always listen to a student who wants to talk about a concern. If a student tells a member of staff that they know about or have been a victim of child abuse or neglect the member of staff should:

- Allow the child to speak freely and remain calm. Do not interrupt the child or be afraid of silences;
- Provide reassuring nods and words such as, "I am so sorry this has happened", "You are doing the right thing in talking to me". Avoid saying things like, "I wish you had told me about this earlier" or "I cannot believe what I am hearing";
- Limit questioning to the minimum necessary for clarification and avoid leading questions such as, "Has this happened to your siblings?";
- At an appropriate time, tell the child that the matter will be referred in confidence to the appropriate people. Promises of confidentiality should not be given (see Confidentiality section below);
- Tell the child what will happen next. The child may want to accompany you to see the DSL, otherwise let the child know that someone will come to see them before the end of the Club day';
- Write up the conversation / disclosure as soon as possible on the Cause for Concern Form and hand it to the DSL; and
- Seek support if they feel distressed.

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Peer on peer abuse

If a member of staff thinks that a student may pose a risk of harm to themselves or to others (this includes but is not limited to cases of serious bullying), the member of staff should report their concern to the DSL as soon as possible.

All staff should be aware that (a) safeguarding issues can manifest themselves via peer on peer abuse; and (b) children are capable of abusing their peers. Such abuse should never be tolerated or normalised through the common myth that it is part of growing up. This is most likely to include but is not limited to bullying (including cyber bullying), gender based violence, grooming, inappropriate or harmful sexualised play (younger children), sexual assaults, sexting and gender issues within groups of girls and boys. Should an allegation of abuse be made against another student, all players involved (whether perpetrator or victim) will be treated as being "at risk". Time should be taken to consider the help and support needed for all players involved. Where there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm, the allegation will be referred to the DSL immediately who may in turn then report to Child Protective Services.

Confidentiality

Staff should never guarantee confidentiality to players or adults who wish to share a safeguarding concern or to disclose, as this may ultimately not be in the best interests of the student. Staff should guarantee that they will not tell anyone who does not have a clear need to know and that they will pass on information in confidence only to the people who must be told in order to ensure that the appropriate actions are taken. All staff involved must also take all reasonable steps to protect the informant from any retaliation and / or unnecessary stress that may occur after a disclosure has been made and the case escalated.

Part C: Identifying Concerns - Types and signs of abuse and neglect

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

Abuse

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or within an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult (or adults) or another child (or children).

One of the best ways to help players protect themselves against abuse (actual or potential) is by making them aware of what constitutes possible abuse and / or neglect. All staff should be aware of the signs of abuse and neglect so that they are able to identify players who may be in need of help or protection. These signs of abuse and neglect can take many forms, including physical injuries and behavioural indicators. Although in most cases these signs will manifest themselves in children who are themselves the victims of abuse, it is important to remember that adults can also display significant indicators which suggest the existence of their own abuse as children. Staff should also be alert to any comments or jokes made by other players in the Club.

All staff should familiarize themselves with the list set out under "Physical abuse" (below) which, although not exhaustive, includes common signs of abuse which, if present, may indicate a problem requiring follow up. It is important to recognise that some young people who are being sexually exploited or abused do not exhibit any external signs of this abuse. Sometimes children do not even realise that what is happening to them constitutes abuse. It is also sometimes difficult to tell the difference between injuries suffered as part of normal childhood activities and those resulting from abuse. If a staff member is unsure, he/she should discuss the case with the DSL. The publications of the Ministry of Social and Family Development on Child Abuse & Protection include advice on how to spot signs and patterns of abuse and neglect.

Physical abuse

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

There is no single definitive sign to look out for that proves that a child is being physically abused. However if a student often presents with injuries, there seems to be a pattern or the explanation does not match the injury then any of these indicators should be investigated. Signs of physical abuse can include:

- injury to parts of the body where accidents are unlikely (e.g., thighs, back, abdomen);
- respiratory problems from drowning, suffocation or poisoning;
- untreated or inadequately treated injuries;
- bruising which looks like hand or finger marks;
- cigarette burns, human bites; or
- scarring, scalds and burns.

Sexual 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 fully appreciates what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts (e.g., masturbation, kissing, rubbing and touching outside of clothing). They may also include non-contact activities, (e.g., involving children viewing , or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult

males. Women can also commit acts of sexual abuse, as can other children. Signs of sexual abuse displayed by children may include:

- pregnancy
- sexually transmitted infection
- pain/itching/bleeding/bruising/discharge to the genital area/anus;
- urinary infections
- difficulty walking or sitting; or
- persistent sore throats.

Neglect

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

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

- provide adequate food², clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers); or
- ensure access to appropriate medical care or treatment.

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

- the child seems underweight or is very small for their age;
- the child is poorly clothed, with inadequate protection from the weather;
- the child is often absent from Club for no apparent reason; or
- the child regularly left alone, or in charge of younger brothers or sisters.

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless, unloved or inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. Emotional abuse may also feature age or developmentally inappropriate expectations being imposed on children, including interactions that are beyond the child's developmental capability as well as overprotection and limitation of exploration and learning, preventing the child from participating in normal social interactions, seeing or hearing the ill-treatment of another child, serious bullying (including cyberbullying), causing children to frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. Signs of emotional abuse tend to be behavioural rather than physical (see below).

Behavioural signs of abuse and neglect

If a child is being abused, their behaviour may change in a number of ways. For example, they may:

- behave aggressively or be disruptive, act out, demand attention and require more discipline than other children;
- become angry or disinterested and/or show little creativity;
- seem frightened of certain adults;
- become sad, withdrawn or depressed;
- have trouble sleeping;
- become sexually active at a young age;

² Vigilance with regards to snack / break time or lunchtimes is strongly advised

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- exhibit inappropriate sexual knowledge for their age or sexualised behaviour in their play with other children;
- refuse to change for gym or participate in physical activities;
- develop eating disorders;
- self-harm;
- refuse to attend Club or run away from home;
- lack confidence or have low self-esteem; or
- use drugs or alcohol.

Children with Special Educational Needs and/or Disabilities

Children with special educational needs (SEN) and disabilities may face additional safeguarding challenges and additional barriers may exist when recognising abuse and neglect in this group of children. Such challenges and barriers include assumptions that :

- indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- Children with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs; and
- There are communication barriers and difficulties in overcoming such challenges.

Signs of abuse or neglect manifested by the parents or other responsible adult

- Unrealistic expectations of the child (i.e., demanding a level of academic or physical performance of which they are not capable of);
- Offers conflicting or unconvincing explanation of any injuries to the child;
- Appears indifferent to or overtly rejects the child;
- Denies existence of or blames the child for the child's problems at home or at Club;
- Views and describes the child as entirely worthless, burdensome or in another negative light;
- Refuses offers of help for the child's problems; or
- Physically and / or emotionally isolation

Grooming

Grooming is the process by which an individual prepares a child, significant adults³ and the environment for abuse of this child. Children and young people can be groomed online or in the real world, by a stranger or someone they know. Groomers can be male or female and of any age. Many children and young people do not understand that they have been groomed (whether sexually or for radicalisation), or that what has happened to them constitutes is abuse. The signs of grooming are not always obvious. Groomers will also go to great lengths not to identified. Children may in consequence of grooming:

- Become very secretive, including about what they are doing online;
- have older boyfriends or girlfriends;
- go to unusual places to meet friends;
- have new things such as clothes or mobile phones that they can't or won't explain;
- have access to drugs and / or alcohol;
- go missing from home or Club;
- display behavioural changes;
- have sexual health issues; or
- present as suicidal, self-harming, feeling depressed and / or unworthy.

In older children, signs of grooming can easily be mistaken for 'normal' teenage behaviour, but common observations include unexplained changes in behaviour or personality, or inappropriate sexual behaviour for their age.

³ Significant adult refers to the key adults in children's lives, e.g., Parents / Carers

Signs of grooming and/or online abuse

A child may be experiencing abuse online if they:

- spend a lot, much more or much less time online, texting, gaming or using social media;
- is withdrawn, upset or outraged after using the internet or texting;
- is secretive about who they're talking to and what they're doing online or on their mobile phone; and/or
- has many new phone numbers, texts or e-mail addresses on their mobile phone, laptop or tablet.

Signs of grooming manifested by sex offenders

It is important to remember that not all sex offenders will exhibit these following signs. Even if an individual exhibits some or all of these signs it does not necessarily mean that they are a sex offender.-

- Overly affectionate behaviour with a child;
- Affording special attention or preferential treatment to a child;
- Spending excessive time alone with a child outside of the classroom/Club;
- Frequently spending time with a child in private or isolated areas;
- Transporting a child to or from the Club;
- Making friends with a child's parents and visiting their home;
- Acting as a particular child's confidante;
- Giving small gifts, money, toys, cards, letters to a child;
- Using texts, telephone calls, e-mails or social networking sites to inappropriately communicate with a child; or
- Flirtatious behaviour or making suggestive remarks or comments of a sexual nature around a child.

Signs of institutional grooming

- Target vulnerable victim - Perpetrators target victims who are vulnerable, isolated, insecure and/or have greater emotional needs;
- Gain victim's trust – Offenders may allow a child to do something (e.g. eat ice cream, stay up late, view pornography) which is not normally permitted by the child's parents or the Club in order to foster secrecy;
- Gain the trust of others – Institutional offenders are often popular with children and parents, successfully grooming not only the victim but also other members of the victim's family and the community at large;
- Filling a need / becoming more important to the child - This can involve giving gifts, rewards, additional help or advice, favoritism, special attention and/or opportunities for special trips or outings.
- Isolating the child - The perpetrator may encourage dependency and subtly undermine the victim's other relationships with friends or family members;
- Sexualising the relationship - This can involve playful touches, tickling and hugs. It may involve adult jokes and innuendo or talking as if adults, (e.g., marital problems or conflicts);
- Maintaining control and secrecy - Offenders may use their professional position to make a child believe that they have no choice but to submit to the offender.

Signs of grooming for radicalisation

There are no known definitive indicators that a young person is vulnerable to radicalisation, but there are a number of signs that collectively increase their risk of being groomed in this way. Signs of vulnerability include:

- Underachievement;
- Being in possession of extremist literature;
- Poverty;
- Social exclusion;
- Traumatic events;
- Global or national events;

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- Religious conversion;
- Change in behaviour;
- Extremist influences;
- Conflict with family over lifestyle;
- Confused identity;
- Victim or witness to race or hate crimes; or
- Rejection by peers, family, social groups or faith

Part D: Specific Safeguarding Issues

All staff should be aware of specific safeguarding issues, including those below listed below. Safeguarding may be linked to issues such as drug taking, alcohol abuse, truanting and sexting. Sexting can become an aspect of online safety abuse if it is between adults/children.

Child Sexual Exploitation (CSE)

CSE is a form of abuse, which involves children receiving something in exchange for sexual activity. CSE involves an imbalance of power in the relationship. It may involve varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying, cyberbullying and grooming. In addition to the behavioural indicators above, key indicators of CSE include appearing with unexplained gifts or new possessions; associating with other young people involved in exploitation; and having older boyfriends or girlfriends. Any concerns regarding CSE should be immediately reported to the DSL.

Action if a student is missing

The Club needs to be aware of players who are persistently absent or missing from Club as this may be an indicator of welfare concerns. The Club must also be aware of its role in preventing children from going missing from Club.

Preventing radicalisation and extremism

The Club should prevent players from being drawn into terrorism. The referral procedures set out above also apply where there are concerns about players who may be at risk of being drawn into terrorism. Any suspicions of radicalisation should be reported to the DSL, who can contact a hotline for reporting suspicions of radicalisation via the ISD Counter-Terrorism Centre hotline 1800-2626-473 (1800-2626-ISD).

Corporal punishment

Corporal punishment, or the threat of it, is never permitted in the Club.

Safeguarding messages should also be promoted to parents and the community outside of the Club, with regular updates and focused notices shared in a variety of formats.

Part E: Actions where there are safeguarding concerns or allegations about the conduct of another adult.

The safety and wellbeing of players in the Club is dependent on the vigilance of all staff and their prompt communication to the DSL of any concerns, no matter how small, about any conduct by any adult which causes one to doubt that adult's suitability to work with or have access to children. In this Part E, all references to "adult" shall be interpreted as meaning any adult in the Club, including all "members of staff" (defined above) and visitors, unless otherwise stated. The Club is conscious of its duty of care to players and will always act, including when alerted to the possibility of abuse arising from situations or persons outside the Club setting.

The notification and prompt handling of all concerns about adults is fundamental to safeguarding players. Vigilance and a proactive response to concerns help identify and prevent abuse and to protect adults against misunderstandings or misinterpretations. It also encourages openness, trust and transparency and it clarifies expected behaviours. Any adult that raises a concern or reports an allegation in good faith will always be supported, and adults in respect of whom concerns or allegations have been raised will not suffer any detriment unless the concern or allegation is found to be substantiated.

Low level concerns

Aims

The overarching aim of the Club's low-level concern is to foster a culture in which the clear values and expected behaviours set out in the above named policy are lived, constantly monitored and reinforced by all staff. In particular, the intention of this policy is to:

- Maintain a culture of openness, trust and transparency, in which staff are confident and clear about behaviours expected of themselves and their colleagues, as well as the delineation of boundaries and reporting lines.
- Ensure staff feel empowered to raise any low-level concern, whether about their own or a colleague's behaviour, where that behaviour might be construed as falling short of the standards set out in the above named policy. .
- Provide for responsive, sensitive and proportionate handling of safeguarding concerns when they are raised – maintaining confidence that concerns when raised will be handled promptly and effectively whilst protecting staff from false allegations or misunderstandings.

What is a low-level concern?

A low-level concern for the purpose of this Safeguarding Policy is any concern, no matter how small and even if no more than a 'nagging doubt', that an adult may have acted in a manner inconsistent with the Code of Conduct or simply (even if not linked to a particular act or omission) a sense of unease as to the adult's behaviour, particularly towards or around children.

What should I do if I have a low level concern?

Where a low-level concern exists, it should be reported to the DSL as soon as reasonably possible and in any event, within 24 hours of the adult becoming aware of it (where the concern relates to a particular incident).

How will my low-level concern be handled?

On receipt of a Low-level Concern Report, the DSL will in the first instance satisfy him/herself that it is low-level concern and should not be reclassified as a higher level concern/allegation and dealt with under the appropriate procedure below. The circumstances in which a low-level concern might be reclassified are where (a) the threshold is met for a higher level concern/allegation (b) there is a pattern of low-level concerns which collectively amount to a higher level concern/allegation or (c) there is other information which when taken into account leads to a higher level concern/allegation. Where the DSL is in any doubt, advice should be sought from the President and Vice President of the Club, if necessary, on a no-names basis.

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Having established that the concern is low level the DSL will discuss it with the individual who has raised it and will take any other steps to investigate it as necessary. Most low-level concerns by their very nature are likely to be minor and will be dealt with by means of management guidance, training etc. In some cases, it may be appropriate to address them more formally, for example through the Club's disciplinary procedure.

What records will be kept?

The Club maintains a series of e-folders that are accessible only to safeguarding staff. There are instances where, for example, a low-level concern that has been communicated to the DSL, remaining a confidential written record, will be kept in a central file, which logs all low-level concerns. This process is necessary to enable patterns to be spotted. However, no record will be made of the concern on the individual's personnel file (and no mention made in job references), unless either: (a) the concern has been reclassified as a higher level concern (as above) or (b) the concern is sufficiently serious to result in formal action under the Club's disciplinary procedure.

What about self-reports?

This Safeguarding Policy is intended to encourage awareness of an individual's own behaviour and actions as well as those of others. From time to time, an individual may find him/herself in a situation which might appear compromising to others or which may be misconstrued. Equally, an individual may have behaved in a manner which on reflection he/she considers as falling below the standard set out in the Code of Conduct. Self-reporting in these circumstances is encouraged as it demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they might be perceived. As such, the Club views self-reporting of low-level concerns as an important means of maintaining a culture where all staff aspire to the highest standards of conduct and behaviour.

Higher level concerns and allegations

What is a higher level concern or allegation?

A higher level concern or allegation is any behaviour where an adult is alleged to have:

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child; or
- Behaved towards a child or children in a way that indicates he or she could pose a risk of harm to children

What should I do if I have a high level concern?

Higher level concerns or allegations should be reported to the President immediately. The adult to whom the concern or allegation relates should not be informed.

If the allegation is about the President or another Committee Member, it must be referred to AFL Asia, immediately, without informing the President.

How will higher level concerns or allegations be handled?

The President (or AFL Asia, in the case of an allegation about the President) will discuss with relevant agencies such as the Child Protective Service or the police, which further steps (if any), should be taken, including informing parents of the relevant student / players. There may be cases where the local authorities or police are made aware of an allegation before the Club is, and Club may be notified by the authorities. All discussions with external agencies should be recorded in writing.

Confidentiality and Information sharing

When an allegation is made, the Club will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

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The initial sharing of information and investigation may lead to a decision that no further action is to be taken in which case such a decision should be recorded by the President and a decision made on what information should be put in writing to the individual concerned. The President should then consider what action (s) should follow, both in respect of the individual and those who made the initial allegation.

The person against whom an allegation is made, and parents, carers of, or child (ren) involved, should normally be informed as soon as possible after the result of the initial investigation is known. However where a strategy discussion is needed or police or the Child Protective Service needs to be involved, then neither the person against whom the allegation has been made, nor the parents, should be informed until these agencies have been consulted.

During the course of the investigation the Club in consultation with any external government agencies will decide what information should be given to parents, staff and other players and how press enquiries are to be dealt with.

When the individual against whom the allegations have been made is spoken to, he/she will be warned that anything said will be recorded. The Club will nominate a representative to keep the person informed of the likely course of action and the progress of the case. The Club will advise the individual to contact his / her trade union representative, if they have one, or a colleague for support. They should also be given access to welfare counselling or medical advice where this is provided by the employer. The individual will be kept informed of the timescales.

Circumstances where suspension will be considered

If there is cause to suspect that a child or children at the Club are at risk of harm from the individual against whom the allegations have been made, or if the case is so serious that there may be grounds for dismissal, then such individual may be suspended. Due weight should be given to the views of any external agencies and those of the police when making a decision about suspension and all alternative options should be considered prior to taking that step. The reasons and justification for suspension will be recorded and the individual informed. In the case of staff, the matter will normally be dealt with in accordance with the Staff Disciplinary Procedure and with advice from Human Resources.

Records of higher level concerns or allegations

A record will be made of all conversations, including any advice or recommendations by any local authorities or the Child Protective Service or the police. These written records and any associated documentation shall be maintained in a folder, which relates exclusively to allegations against individuals against whom the allegations have been made. A clear and comprehensive summary of all allegations shall be kept in the confidential personnel file of the individual against whom the allegations have been made, and a copy provided to the individual concerned. The summary shall include details of how the allegation was followed up and resolved, any action (s) taken and decisions reached. Allegations that are found to have been malicious will be removed from the individual's personnel records. However, for all substantiated allegations, the Club will retain a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, action (s) taken and decision reached on the personnel record. A copy will be provided to the individual concerned.

The individual's personnel record should be retained until normal pension age or for a period of 10 years from the date of the allegation, whichever is longer. Allegations that are found to be false, unsubstantiated or malicious will not be included on employer references provided by the Club.

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Miscellaneous

Disciplinary, Grievance Procedures

Where a safeguarding concern or allegation triggers another procedure such as grievance or disciplinary, the latter procedure shall be followed only after the immediate safeguarding concern or allegation has been fully investigated.

Support for staff

Where the impact of a serious child protection case, or allegation against an adult working in or linked to the Club, has a detrimental effect on other staff well-being, the Club will facilitate access to support and/or counselling if requested.

Parents and players

If a parent or student has a safeguarding concern, question, doubt or allegation about the conduct of an adult, he/she should raise it with the DSL or President. If a parent or student raises their concern with another member of staff, it will be immediately passed onto the DSL or President in accordance with this Safeguarding Policy.

Feedback

The Club uses an online survey to seek annual feedback from staff, parents and players on their ability to raise concerns and allegations. This enables the Club to ensure that (a) all staff, players and parents have a forum in which to raise concerns or allegations and ensures that they know who in the Club to speak to if they have a concern; and (b) that these concerns or allegations are dealt with promptly and appropriately by the Club.

Part F: Responsibilities and Training

Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead takes lead responsibility for safeguarding and child protection in the Club. The DSL is a member of the Club. The responsibilities of the DSL include managing referrals, working with other professionals and agencies, keeping up-to-date with relevant training, keeping staff up-to-date with relevant safeguarding training, maintaining a secure awareness of child protection and safeguarding, maintaining accurate records, transferring records etc. The DSL liaises with the President on safeguarding issues and may refer any cases of suspected abuse to the local authorities and the police. The President and DSL have the necessary status and authority to take responsibility for safeguarding matters including committing resources and, where appropriate, supporting and directing other staff.

All child protection and safeguarding concerns, discussions and decisions made and the reasons for such decisions should be recorded accurately and kept securely. All records are carefully managed by the DSL.

Support for and supervision of staff

All staff should feel comfortable and confident approaching the DSL, or any other committee member about any safeguarding and/or pastoral care concerns, including those in relation to unsafe practice. If a staff member would like additional support and/or training in order to fulfil their safeguarding responsibilities, including in identifying and/or handling concerns, he / she should speak to the DSL who will work with the member of staff to ensure that they are adequately supported. Safeguarding and pastoral care responsibilities are a key part of staff appraisals and staff should use the performance management process to build and improve their knowledge, confidence and experience in these areas.

Safeguarding and Child Protection Policy

Training

Staff should re-read this Safeguarding Policy each time it is updated, and are informed by the DSL of updates. Staff are expected to sign to note that they have each read, understood and will comply with the contents of this Safeguarding policy. Refresher training for staff is provided regularly. All staff are provided with safeguarding and child protection updates annually, as a minimum. The DSL takes the lead by ensuring that regular safeguarding and child protection updates are circulated to all staff.

The DSL receives safeguarding and child protection updates and training at least annually.

Part H: Other safeguarding policies

Code of Conduct

All staff must behave responsibly and professionally in all dealings with children and specifically with players for whom they have a duty of care. Staff should always avoid behaviour which might be misinterpreted by others, and report to the DSL any incident with this potential.

As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a student cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. Staff should note that it is an offence for a person to touch a child in a sexual way or have a sexual relationship with a child, even if the relationship is consensual. In Singapore, such offences against children are covered under the Penal Code (Chapter 224), Revised Edition 2008, and the Children and Young Persons Act (chapter 38), Revised Edition 2001 and is not contingent on the offender being 'in a position of trust'.

The Club does not permit the use of personal mobile phones and cameras by staff where children are present.

Safe Recruitment

The Club prioritises embedding a culture of safe recruitment as part of its strategy for preventing harm to children. Procedures for checking the suitability of staff and volunteers who work with children are always followed, including checking their identity, obtaining background screening checks, (including social media checks, and barred list information for those in regulated activity), mental and physical fitness, verifying professional qualifications as appropriate, prohibition from teaching and/or management of an independent check, detailed references and interview information.

Any individual working on our Club site, and/or off-site with our players, for whom background screening check has not been obtained, will be supervised by Club staff at all times. Importantly, the following points are adhered to;

- there must be supervision by another member of staff who has completed background screening checks in place;
- the supervision must be regular and day-to-day; and
- the supervision must be 'reasonable' in all the circumstances to ensure the protection of children.

Review of Policy and Procedures

The Club carries out a periodic review of the Safeguarding Policy, led by the DSL. Such reviews include an evaluation of the extent to which the Safeguarding Policy and all other related Safeguarding Policies have been effectively implemented throughout the Club. The Club will remedy any deficiencies or weaknesses in

Safeguarding and Child Protection Policy

child protection arrangements without delay and without waiting for the next Safeguarding Policy review date, should any be necessary.

APPENDIX 1 Confidential

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|----------------------------|
| Sheet of |
|----------------------------|

Adult Low Level Concern or Self-report

| | |
|---|---------------------|
| Club name | |
| | |
| Name of adult making the report and signature | Role in Club |
| | |
| Person referred to and their role | Date |
| | |
| <ul style="list-style-type: none">• Use this form to record any concerns• The form should be handed directly to the DSL or President as soon as possible• Be as precise and accurate as possible.• Continue on a separate A4 sheet if necessary. Each page should be numbered (page x of x), dated and signed. | |

| |
|---|
| Nature of low level concern or self-report |
| |

| |
|---------------------|
| Action taken |
| |