



FOREWORD

This Safeguarding Children Policy (the “**Policy**”) reflects the safeguarding ethos of the Tottenham Hotspur Football and Athletic Co. Limited (trading as “**Tottenham Hotspur Football Club**”), its Group Companies, Tottenham Hotspur Foundation (a registered charity known as the “**Foundation**”) and Tottenham Hotspur Women’s Football Club Limited – together the “**Club**”.

The board of directors of the Club endorses this Policy as part of the Club’s constitution and commitment to safeguard and promote the welfare of Children.

The Club is committed to working in partnership with The Football Association, the Premier League and all relevant statutory and regulatory agencies to ensure that information and training opportunities are available to all Staff to ensure best practice when working with Children. Adopting best practice will help to safeguard Children from potential Abuse as well as reducing the likelihood of Concerns being made about Staff and other adults in positions of responsibility within the Club.

Matthew Collecott

STRATEGIC SAFEGUARDING LEAD

Operations and Finance Director

Board of Directors of Tottenham Hotspur Football & Athletic Co. Ltd.

Effective Date of Policy: September 2024

Policy Owner/Lead: Head of Safeguarding and Welfare

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INTRODUCTION

This Policy reflects the safeguarding vision, values and strategy of the Club.

The Club is dedicated to taking all reasonable steps to make it as difficult as possible for any form of Abuse of Children to take place in both physical and online environments and this Policy forms part of those efforts to ensure that safeguarding is firmly embedded in the values and practices of the Club and its Staff.

POLICY STATEMENT

The Club believes that Children have the right to take part in Club Activities in an environment which is safe and free from any risk of Abuse and that everyone has a responsibility to promote the welfare of all Children, to keep them safe and to practise and operate in a way that protects them.

The Club recognises its moral, legal and regulatory responsibility to safeguard and promote the welfare of all Children. Upon that basis, the Club's approach to safeguarding is underpinned by legislation, statutory and regulatory guidance, compliance with Football Authority Regulations and current best practice.

The Club are committed to working closely with the Local Authority Designated Officer ("LADO"), The Football Association and the Premier League to ensure safeguarding is prioritised and that high standards of safeguarding practice are in place across all areas of the Club and that any Concern is taken seriously and responded to swiftly, fairly and appropriately.

In accordance with the Premier League's Safeguarding Standards 2024/25, the Club has worked closely with the LADO to develop robust policies and procedures to safeguard Children, including this, Policy.

This Policy sets out the key principles that the Club adheres to as well as providing best practice guidance.

Children regardless of gender, race, age, ethnicity, ability, sexual orientation, and religious or political beliefs have equal right to protection from Abuse. These aspects along with additional vulnerabilities are carefully considered by the Club and appropriate measures and support provided as detailed further below.

In light of these commitments, the objectives of this Policy are to enable and empower all Staff with the necessary information to carry out their moral, legal and regulatory responsibilities, which contribute to the protection, and wellbeing of all Children under the Club's care.

The Club will do this through its continuous commitment to educate Staff, safer recruitment processes and engendering a "vigilant and listening culture", whereby Staff understand and are demonstrably committed to the organisational ethos of safeguarding and protecting Children. The Club will also build and maintain a culture of accountability that drives continuous improvement; creates and reinforces attitudes and behaviours that value Children; as well as develop, implement and review detailed safeguarding arrangements; and maintain a Strategic Safeguarding Lead who will have overall responsibility for safeguarding at the Club.

The Club undertakes to make available (on request) to stakeholders electronic copies of this Policy as amended from time to time. Electronic copies of this Policy are available on the Shelf and Spurs website (the "**Website**"). The Website will also contain contact details in the event that (i) any person is unable to download this, Policy; and/or (ii) any person requires this Policy in another form, for example, in braille or large print. All requests will be considered on their merits on a case-by-case basis. In circumstances where an individual has been classified as having an intellectual impairment, the Club shall use all reasonable endeavours to communicate the contents of

this Policy to such individual in the most appropriate manner.

The Club has a dedicated “**Safeguarding Team**” with primary responsibility for working with Staff to provide guidance and support in relation to any safeguarding Concerns or queries.

The Club’s board of directors is committed to contributing to raising safeguarding awareness and communicating policies and procedures as well as driving the Club’s culture of vigilance and action. In furtherance of this commitment, the Club maintains effective lines of communication between its board of directors and Safeguarding Team.

The Club's board level Strategic Safeguarding Lead is Matthew Collecott, who oversees the Club's safeguarding arrangements and procedures.

Any Club-wide safeguarding Concerns can be addressed to any member of the wider Safeguarding Team via the contact details contained within the table below. Other helpful external agency contact details contained within **Appendix 2**.

Title/Role	Name	Contact Details
Club Safeguarding Team		safeguarding@tottenhamhotspur.com
Out of Hours Safeguarding Contact		safeguarding@tottenhamhotspur.com
Operations and Finance Director – Strategic Safeguarding Lead Board Representative	Matthew Collecott	020 83655322 matthew.collecott@tottenhamhotspur.com
Interim Head of Safeguarding and Welfare	Dawn Grant	07786186824 Dawn.grant@tottenhamhotspur.com or safeguarding@tottenhamhotspur.com
Safeguarding Manager - Foundation	Natalee Hibbert	07384 258 758 natalee.hibbert@tottenhamhotspur.com
Safeguarding Manager – Women and Girls	Sandra Barratt	07384 818062 sandra.barratt@tottenhamhotspur.com
Safeguarding Manager Academy	Tim Ford	07392080266 Tim.Ford@tottenhamhotspur.com
Senior Events Safeguarding Manager	Karen Bright	07918305242 Karen.bright@tottenhamhotspur.com
HR Director – Safer Recruitment	Lisa Beresford – Hines	lisa.beresford-hines@tottenhamhotspur.com

DEFINITIONS AND RULES OF INTERPRETATION

The following definitions apply in this Policy:

Abuse:	is any form of harm or maltreatment of a Child. There are four main types of Abuse: Emotional Abuse, Physical Abuse, Sexual Abuse and Neglect. Other forms of Abuse may include Exploitation, Discriminatory Abuse or Psychological Abuse;
Activity / Activities:	face to face/in-person or online activity or series of activities, arranged by or in the name of the Club for or to be attended by Children;
Bullying:	a form of Emotional Abuse whereby a Child is discriminated against;
Child/Children:	a person under the age of 18;
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 into sexual activity usually in exchange for something the victim needs or wants;
Concern:	fear, worry or concern that a Child may be at risk of Abuse;
Contextual Safeguarding:	maltreatment, whether that is within or outside the Home, including online;
Cyber Bullying:	a form of online Emotional Abuse whereby a Child is discriminated against;
Data Protection Legislation:	all applicable laws relating to data protection, the processing of personal data and privacy, including: the Retained EU law version of the General Data Protection Regulation ((EU) (2016/679)) (“UK GDPR”) and the Data Protection Act 2018, the Privacy and Electronic Communications (EC Directive) Regulations 2003 (as may be amended by the proposed Regulation on Privacy and Electronic Communications), and any other data protection and/or privacy legislation applicable in the UK from time to time, (each as amended, updated, replaced or re-enacted from time to time and including all subordinate legislation made from time to time under or giving effect to the same) and references to “controller”, “personal data”, “special category data”, “process”, “processing” and “supervisory authority” have

the meanings set out in, and will be interpreted in accordance with, such applicable laws;

Discriminatory Abuse:

including racist, sexist, that based on a Child's disability or other protected personal characteristic as defined in the Equality Act 2010, as well as other forms of harassment, slurs or similar unfair treatment;

Emotional Abuse:

the persistent emotional maltreatment of a Child such as to cause severe and persistent adverse effects on the Child's emotional development;

Extremism:

vocal or active opposition to fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs;

Football Authority Regulations:

the rules and regulations from time to time in force of any Governing Body, national association or league under the auspices of The Football Association and/or the Premier League to the extent that they relate or apply to the Club;

Neglect:

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;

Online Safety:

(also known as internet safety, e-safety or cyber safety) refers to the act of staying safe online and the safe and responsible use of technology. This includes the use of the internet and also other means of communication using electronic media, for example social media, text or other messaging applications, gaming devices, email, etc.;

Premier League:

professional football's top highest recognised league in England;

Physical Abuse:

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 other person with parental responsibility fabricates the symptoms of, or deliberately induces, illness in a Child;

Psychological Abuse:

including Emotional Abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, Verbal Abuse, isolation or withdrawal from services or supportive networks;

Radicalisation:

the process by which a person comes to support or engage with Terrorism and forms of Extremism leading to

Terrorism;

Sexual Abuse:

forcing or enticing a Child 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 as well as non-contact activities, such as grooming. Child Sexual Exploitation is a form of Sexual Abuse;

Staff:

any person acting for or on behalf of the Club in an official role whether as an employee, volunteer, casual workers or staff, consultant or otherwise;

Terrorism:

an action that endangers or causes serious violence to a person/ people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the Government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause;

The Football Association:

the national governing body of football in England;

Verbal Abuse:

verbal maltreatment of a Child; and

Vulnerability:

being susceptible to additional risks of harm or Abuse including but not limited to racism, Radicalisation and in need of special care, support, or protection.

APPLICATION OF THE POLICY

This Policy applies to all Staff.

All Staff under the jurisdiction of the Club agree to abide by all Club policies and procedures as in place from time to time including this, Policy.

POWER TO CHANGE, RESCIND OR ADD TO THE PROVISIONS OF THE POLICY

In the event an issue arises that is not foreseen in this Policy, it will be addressed by the Club in a manner that protects and promotes the objectives identified in this Policy.

LAWS

The laws of England and Wales shall apply to this Policy.

STAFF RESPONSIBILITIES

In addition to the duties and obligations arising under any other contracts, policies or procedures under which they

may be subject, all Staff shall:

- a) accept the moral, legal and regulatory responsibility to provide a duty of care for Children, to safeguard their wellbeing, and to protect them from Abuse;
- b) respect and promote the rights, wishes and feelings of Children;
- c) recognise that some Children may face additional barriers to getting help because of additional Vulnerabilities which could include their ethnicity, gender, age, religion, disability, sexual orientation, social background or culture. There should be awareness that these characteristics may mean that they are at greater risk of Abuse because of factors such as prejudice, discrimination, reduced ability to resist or report Abuse, communication barriers or myths based on stereotypes;
- d) respond appropriately to any Concerns;
- e) read, accept and abide by this Policy as well as all other Club policies and procedures as in place from time to time including:
 - Managing Allegations against staff
 - Safeguarding Adults Policy
 - Safeguarding Code of Conduct
 - Disclosure and Barring Service Policy
 - Safer Recruitment Policy
 - Modern Slavery Policy
 - Sexual Misconduct Policy

All policies are available to access via the Shelf.

STAFF TRAINING

All new Staff shall complete the Club's induction process which includes familiarisation with the Club's safeguarding policies, procedures (including this Policy) and expected standards of behaviour including those contained within the Safeguarding Code of Conduct.

All Staff shall complete the Premier League's safeguarding e-learning module (or an appropriate equivalent approved by the Club's Head of Safeguarding in accordance with Premier League Rule S.8.) before commencing their role or as part of the induction process. This will be followed by delivery of face-to-face safeguarding training either before or very soon after commencing their role.

Following the induction period all Staff shall receive appropriate and relevant safeguarding education and training including Online Safety training, "PREVENT" training in accordance with the Club's "PREVENT Duty" (detailed and defined further below) and the Premier League's Safeguarding Standards 2024/25 including training in relation to awareness to support identification of mental health issues and additional Vulnerabilities with Children. Refresher training will be provided at appropriate intervals.

SAFEGUARDING LEGISLATION AND GUIDANCE

The Club's approach to Child protection is based on the principles recognised within UK and International legislation and UK Government guidance. For the purposes of this Policy, the following have been taken into consideration:

- Children's Act 1989
- Children Act 2004
- Care Act 2014
- Human Rights Act 1998
- UN Convention for the Rights of a Child (1989)
- Safeguarding Vulnerable Groups Act 2006
- Domestic Violence Act 2018
- Sexual Offences Act 2003
- Data Protection Act 2018
- Children and Families Act 2014
- Equality Act 2010
- Terrorism Act 2000

Statutory guidance:

- Working Together to Safeguard Children 2023
- Keeping Children Safe in Education 2024

Local guidance:

- London Child Protection Procedures 2024

Regulatory guidance:

- The Football Association Safeguarding Policy and Procedures
- The Premier League Safeguarding Policy and Procedures
- Premier League Guidance for Safer Working Practice

WHAT IS SAFEGUARDING?

Safeguarding is the action that is taken to promote the welfare of Children and protect them from harm.

Safeguarding means:

- protecting Children from Abuse;
- preventing harm to Children's health or development;
- ensuring Children grow up with the provision of safe and effective care; and
- taking action to enable all Children to have the best outcomes.

Child protection is part of the safeguarding process. It focuses on protecting individual Children identified as suffering or likely to suffer significant harm. This includes Child protection procedures which detail how to respond to Concerns about a Child.

GOOD PRACTICE GUIDANCE: WORKING WITH CHILDREN

All Staff are required to adhere the Premier League's Guidance for Safer Working Practice and/or equivalent regulations as in place from time to time.

Abuse, particularly Sexual Abuse, can generate strong emotions in those having to deal with such a Concern. It is important to understand these feelings and not allow them to interfere with your judgement about what action to take.

All Staff should be encouraged to demonstrate exemplary behaviour in order to protect Children and to protect themselves from Concerns.

The relevant sections of the Club's Safeguarding Code of Conduct should be studied. In addition, the following are common sense examples of good practice and how to create a positive culture when working within the Club and with Children:

- always putting the welfare of Children first;
- always working in an open environment (e.g., avoiding private or unobserved situations and encouraging an open environment with no secrets);
- build balanced relationships based on mutual trust which empowers Children to share in the decision-making process;
- treating all Children equally and with respect and dignity;
- maintaining a safe and appropriate distance with Children both emotionally and physically;
- being an excellent role model; and
- recognising the developmental needs, capacity and additional Vulnerabilities of Children.

RECOGNITION OF POOR PRACTICE AND POSSIBLE ABUSE OR NEGLECT

Staff are not expected to be experts at recognition of Child Abuse. However, they do have a responsibility to act if they have any Concerns about the behaviour of someone (an adult or another Child) towards a Child and to follow the reporting procedures in this Policy.

Concerns may relate to poor practice where an adult's or another Child's behaviour is inappropriate and may be causing harm to a Child. In the application of this Policy, poor practice includes any behaviour bringing the Club into disrepute of a Child protection nature or contravening any Football Authority Regulations, Data Protection Legislation or Club policy or guidance, infringing an individuals' rights and/or is a failure to fulfil the highest standards of care.

Examples of poor practice:

- failure to act when you witness possible Abuse, Bullying or Neglect;
- spending excessive amounts of time alone with a Child or Children away from others;
- using inappropriate language;

- making sexually suggestive comments; and
- allowing Concerns raised by a Child to go unchallenged, unrecorded or not acted upon.

Upon this basis, the Club would usually recommend that personal care for very young or disabled Children is not undertaken by Staff. If a Child is disabled to the extent that they need assistance with personal care, this should be carried out by their parent, or other person with parental responsibility.

Staff must report any Concerns or examples of poor practice to the Safeguarding Team immediately and within 24-hours.

IDENTIFYING CONCERNS

It can be very hard for Children to speak out about Abuse. Often, they fear there may be negative consequences if they tell anyone what is happening to them. Some may delay telling someone about Abuse for a long time, while others never tell anyone, even if they want to.

It is vital that Children are able to speak out and that whoever they tell takes them seriously and acts on what they have been told. Even if a Child does not tell someone verbally about what has happened to them, there may be other indicators that something is wrong. Staff need to be able to recognise the signs and know how to respond appropriately.

Staff must maintain an attitude of **“it could happen here”**.

Some common signs that there may be something concerning happening in a Child’s life include:

- unexplained changes in behaviour or personality;
- becoming withdrawn;
- seeming anxious;
- becoming uncharacteristically aggressive;
- poor bond or relationship with a parent, or other person with parental responsibility;
- knowledge of adult issues inappropriate for their age;
- running away or going missing; and
- always choosing to wear clothes which cover their body.

It should be recognised that this list is not exhaustive and the presence of one or more of the indicators is not proof that Abuse is actually taking place. Further examples of signs, actions or behaviours which may give rise to Concerns are contained within **Appendix 1**, below.

It is not the responsibility of Staff to decide if Child Abuse is occurring, but it is the responsibility of all Staff to act on any Concerns by reporting them to the Safeguarding Team.

Staff need to be able to notice the signs that a Child might be distressed and ask them appropriate questions about what might have caused this.

It is important to create an environment where Children are comfortable about speaking out if anything is worrying them.

Staff should never wait until a Child tells you directly that they are being Abused before taking action. Instead, ask the Child if everything is OK or discuss your concerns with the Safeguarding Team as soon as possible, they can help you to assess the situation.

ADDITIONAL VULNERABILITIES

Some Children may be at increased risk of Abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, social deprivation, Children who have experienced adverse Childhood experiences, those with communication issues and reluctance on the part of some adults to accept that Abuse happens, or who have a high level of tolerance in respect of Neglect.

Special consideration and attention should be given to Children who are:

- disabled or have special educational needs;
- looked after Children (i.e., those in care, or those who have experienced being in care);
- living in a known domestic Abuse situation or chaotic or dysfunctional household;
- affected by known parental substance misuse or parental criminality; or
- living away from home.

The presence of these factors does not mean that Child Abuse will occur, but Staff should use their professional judgement to assess their significance in a particular Child and they should be considered alongside any concerning factors.

ONLINE SAFETY

While online gaming, social media, communication and engagement platforms offer many benefits and positive opportunities, it is important to be aware that it is an increasingly influential part of life, particularly for Children and as a result it presents a wide range of risks for Children which includes being exposed to illegal, harmful, explicit or inappropriate content and contact, for example:

- **Content:** pornography, misinformation/fake news, racism, misogyny, self-harm, suicide, pro-suicide content, anti-Semitism, Radicalisation and Extremism, harmful challenges and hoaxes, violence, cruelty to humans and animals, pornography, glorifying activities such as drug taking, sexual abuse and rape.
- **Contact:** being subjected to harmful online interaction with other users, for example, peer to peer pressure, commercial advertising and adults posing as Children with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm. For example, making, sending and receiving explicit images (consensual and non-consensual sharing of nude and semi-nude images or videos) and/or pornography or other explicit images and Cyber Bullying.
- **Commerce:** financial risks such as online gambling, inappropriate advertising, phishing and or financial scams.

As above, social media is a common tool for the sharing of content associated with Extremism. Extremist groups actively use social media to share propaganda, radicalise and recruit for their cause. Staff must be aware of the Club's Online Safety measures which are an important element of protection from Radicalisation and Extremism.

Children may expose themselves to danger, whether knowingly or unknowingly when using the internet and other

technologies including Cyber Bullying. As above, Staff must ensure they are familiar with the Club's Online Safety procedures.

DISCLOSURE

Disclosure is the process by which Children start to share their experiences of Abuse with others. This can take place over a long period of time – it is a journey, not one act or action. Children may disclose directly or indirectly and sometimes they may start sharing details of Abuse before they are ready to put their thoughts and feelings in order.

Not all disclosures will lead to a formal report of Abuse, or a case being made, or a case being taken to court, but all disclosures should be taken seriously.

It takes extraordinary courage for a Child to go through the journey of disclosing Abuse.

It is, therefore, vital that all Staff working with Children are able to provide them with the support they need. Children may disclose Abuse in a variety of ways, including:

- **Directly:** – making specific verbal statements about what's happened to them;
- **Indirectly:** making ambiguous verbal statements which suggest something is wrong;
- **Behaviourally:** displaying behaviour that signals something is wrong (this may or may not be deliberate); or
- **Non-verbally:** writing letters, drawing pictures or trying to communicate in other ways.

If a Child discloses:

- listen to what you are told without leading the conversation;
- use open questions, starting with words such as "what", "how", "when", "where", asking the Child to tell you what happened, allowing them the space, privacy and time to say what they need to;
- continue asking questions until you know whether it is a concern / to rule out a concern;
- report the disclosure on MyConcern App immediately and in any event within 24-hours;
- follow up the recording with a phone call to the Safeguarding Team¹;
- follow the Safeguarding Team's guidance on the best next steps;
- share information on a **need-to-know basis only**. Do not discuss with colleagues, friends or family; and
- seek support for yourself if you are distressed.

Non-biased approach

It is vital that any Child who is trying to disclose Abuse feels that they are being listened to and taken seriously. But there can be a risk that if Staff just believe the Child's account without thoroughly investigating the situation, this can lead to unfair bias against the alleged abuser as formal investigations progress.

This means it is important to maintain an unbiased approach when responding to disclosures to ensure each case

¹ For further details, please refer to the next section "What to do if you're worried about a child".

is treated in a fair and transparent manner and that the Child gets the protection and support that they need.

Making notes

It is important to keep accurate and detailed notes on any Concerns you have about a Child. Staff will need to share these with the Safeguarding Team.

Where possible the note should include:

- the Child's details (name, age, address);
- what the Child said or did that gave you cause for concern (if the Child made a verbal disclosure, write down their exact words); and
- any information the Child has given you about the alleged abuser.

Staff should not:

- start your own investigation;
- ask leading questions (questions that provide the answer within them, such as, "Was it your uncle who hit you?");
- promise a Child that you will keep a secret;
- speak to the alleged abuser about the Concern; or
- fail to report the Concern to the Safeguarding Team.

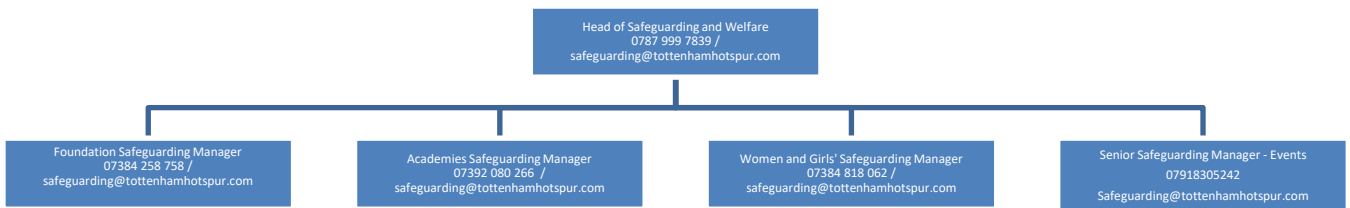
WHAT TO DO IF YOU ARE WORRIED ABOUT A CHILD

If you witness or are worried about a Child, because of something you have noticed in their behaviour or appearance, or because of something they or another person has told you, you **must report your concerns to a member of the Safeguarding Team immediately** and within **24-hours**.

If a Concern comes to your attention "out of hours", staff must report the Concern (via telephone or the email address below) to the Safeguarding Team immediately and within 24-hours. Staff must also take the action necessary to help the Child and ensure their safety. If the Child is in immediate danger, call 999 for local Police. If the Child is in need of immediate medical attention, contact 999 and request emergency medical services, informing them of your Concerns in relation to the alleged Abuse. Contact the parent(s), or other person with parental responsibility and inform them that emergency services/paramedics have been contacted due to the presenting injuries.

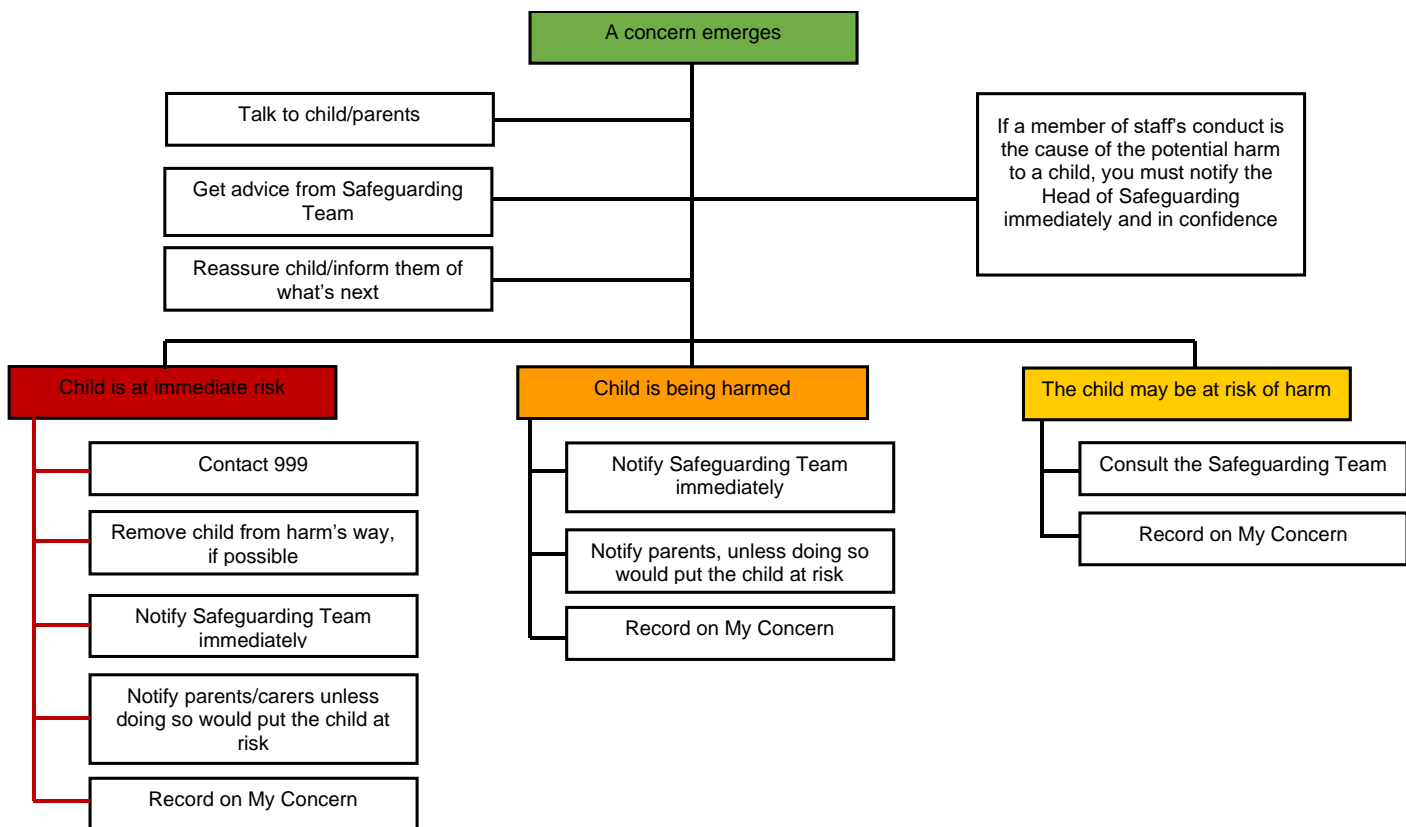
Any Club-wide safeguarding Concerns can be addressed to any member of the wider Safeguarding Team via: safeguarding@tottenhamhotspur.com

Where the Head of Safeguarding and Welfare is absent, their role will be deputised to a Safeguarding Manager, and this will be signalled in the Head of Safeguarding and Welfare's Out of Office message.



- 📌 **Staff's responsibility is to report** to the Safeguarding Team (via the MyConcern App, followed by a phone call)
- 📌 **Safeguarding Team's responsibility is to make decisions** about levels of risk and next steps.

Being concerned about a Child for example, where their behaviour is out of character may not always mean that they are being harmed or Abused. Sometimes a conversation with the Child and/or their parent, or other person with parental responsibility is warranted to try to understand what is going on. If concerns persist after talking to Children and their parent, or other person with parental responsibility, Staff must report the Concern immediately and within 24-hours to the Safeguarding Team.



RECORDING



All Staff should have the MyConcern App on their mobile phones. Please notify the Club's IT team and Safeguarding Team if it is not installed. Staff must register for their account prior to using the MyConcern App. When logging a Concern, Staff must write clearly and concisely, including the time, location, name of the Child, Date of Birth, contact details and a brief description of the Concern. Alternatively, MyConcern can be accessed via a desktop computer.

All Concerns must be logged via the MyConcern App immediately and in any event within 24-hours and followed-up by phone to the Safeguarding Team.

INFORMATION SHARING

Sharing information appropriately is a cornerstone of all safeguarding practice. Serious Case Reviews (statutory reviews into why a Child has died / was killed, or suffered life changing trauma, as a result of Abuse) over the past three decades all share a common failing – a failure of professionals to share information appropriately.

No one person is responsible for safeguarding – **safeguarding is everyone's responsibility**.

No member of Staff should hold responsibility for a Concern alone; best practice requires that all safeguarding Concerns, however seemingly minor, must be shared.

Because seemingly minor Concerns may be serious when combined with other factors, and no one member of Staff can hold the whole picture of concern about a Child, Concerns must always be shared and held centrally by the Club's dedicated Safeguarding Team.

The Safeguarding Team have expertise in safeguarding, hold the wider understanding of risks to individual Children. This makes them best able to judge the severity of concerns presenting.

The Safeguarding Team may share information with partner agencies, such as schools, social care, health and Police.

SEEKING CONSENT TO SHARE TO INFORMATION

Children should be given the opportunity to decide whether they agree to their personal information being shared. If a Child does not have the capacity to make their own decisions ask their parent, or other person with parental responsibility (unless doing so would put the Child at risk of harm).

Tips for getting consent:

- be open and honest;
- make sure the person you are asking for consent understands what information will be shared and why;
- explain who will see the information and what it will be used for;
- make sure the person you are asking for consent understands the consequences of their information not being shared;
- get the consent in writing, in case there are any disputes in the future. If it is only given verbally, make a written record of this;
- make sure the person knows they can withdraw consent at any time.

SHARING INFORMATION WITHOUT CONSENT

If consent is refused or if you are unable to seek consent, you can still share information with relevant professionals if this is in the public interest. This includes protecting Children from significant harm and promoting the welfare of Children.

The Data Protection Act 2018 and General Data Protection Regulation (“**GDPR**”) allow data sharing to take place without consent for safeguarding purposes.

In order to receive support regarding safeguarding issues, contact the Safeguarding Team.

If you are sharing information without consent keep a written record explaining:

- what steps you took to get consent;
- the person’s reasons for not giving consent (if known); and
- why you felt it was necessary to share information without consent.

For further information and advice on sharing information without consent please speak to a member of the legal, risk and compliance team.

CONFIDENTIALITY AND DATA PROTECTION

While sharing information is crucial in order to safeguard Children, it’s equally important that this is done in line with government guidance [Information Sharing: A Guide for Practitioners](#) 2024.

Data protection should not cause us to be overcautious and not share safeguarding Concerns, but it must be recognised that data protection is about protecting people not just data and we must recognise the data rights of children and their families. Confidentiality within a safeguarding context is key to lawful practice, and it sits alongside our obligations under the Data Protection Act and the Human Rights Act. It also helps to maintain a relationship of trust and respect with families.

Sharing information should take place with the consent of parents, or other persons with parental responsibility and in communication with Children, wherever practicable. While consent is not required for the sharing of Child protection Concerns, consent and transparency are always preferred to achieve best practice.

STORAGE OF INFORMATION

Child protection information will be stored and handled in line with the Data Protection Act 2018 and UK GDPR.

- Information will be stored separately from other records and in a secure place with access granted to designated people, in line with the Data Protection Act and UK GDPR – in that information will be accurate, regularly updated/corrected, and that its storage is relevant and secure. See [NSPCC Guidance on Child Protection Records Retention and Storage](#) for more information.
- All safeguarding and Child protection data relating to Children, families and carers is stored on the MyConcern App, which is a secure and encrypted case management system registered with the Information Commissioner’s Office (“**ICO**”) and fully compliant with the Data Protection Act 2018 and UK GDPR.
- Staff are referred to the Club’s Data Protection Policy for more information regarding our data processing.

REFERRALS TO REGULATORS AND STATUTORY AGENCIES

In accordance with the Managing Safeguarding Concerns Against Staff Policy and in compliance with its regulatory and legislative obligations, the Club may refer Concerns to external agencies, including but not limited to:

- The Football Association;
- Premier League;
- Local Authorities (Multi-agency Safeguarding Hub (“MASH”); LADO); and
- the Police.

Referrals to MASH and the Police can be delegated to the Safeguarding Managers and Designated Safeguarding Officer.

If the risk to a Child is serious and immediate, and the Safeguarding Team is not immediately contactable, Staff will be expected to refer concerns directly to the Child’s Local Authority (the Local Authority where the Child lives) and to emergency services if necessary.

CONCERNS INVOLVING STAFF

Whenever there are Concerns involving a member of Staff in respect of a Child, it is a requirement to report them to the Head of Safeguarding immediately and in any event within **24-hours**.

Please see the Low Levels Concerns or Managing Safeguarding Concerns Against Staff Policies for further information.

POSITION OF TRUST

A “**Position of Trust**” involves a person in a position of authority over another person. Individuals who have responsibility for or authority over a Child / Children are in a position of trust. There is a need to protect Children aged 16 and 17 who, despite reaching the age of consent for sexual activity, are considered to be vulnerable to Sexual Abuse and exploitation, in defined circumstances. This includes sexual activity and relationships with adults who hold a Position of Trust, responsibility or authority in relation to them and, as a result, have a considerable amount of power and influence.

The power and influence that a member of Staff has over someone cannot be under-estimated. It is therefore vital for Staff to recognise the responsibility they must exercise in ensuring that they could not be considered to have abused their positions of trust. Everyone involved in supervising Children should be careful to ensure that the appropriate boundaries remain in their working relationships between themselves and participants. Staff are expected to at all times maintain healthy, positive and professional relationships with all Children.

Within the context of Club football, this position of trust can be compounded by the power of the brand and the ability to provide opportunities and access. Staff must always be mindful of this power differential to ensure that their position is not used for personal advantage or gratification and exercised with responsibility and respect.

All Staff are in a Position of Trust in relation to all Children, participants and players whether or not they are in regulated activity.

- No Staff should engage in sexual relationships with any Child. The Club will consider such action “**gross**

misconduct", and this will result in dismissal.

- Under the Sexual Offences Act 2003, amongst many, it is a sexual offence:
 - For a person in a **Position of Trust** to have a sexual "relationship" of any nature with a Child, even if the relationship is apparently consensual.
 - To incite a Child to engage in sexual activity or to be exposed to sexual activity (Sexual Abuse).
 - To produce, possess, or share a Sexual Abuse image / indecent image of a Child.

Any Concerns of these types or any other sexual offences will be referred immediately to the Police and the Local Authority for investigation and proceed with a referral to the DBS Barred List when necessary.

Even where there is no alleged criminal offence, the Club will investigate whether an inappropriate relationship, inappropriate communication or other perceived "grooming" behaviour has been demonstrated by a Staff member. This will be carried out in accordance with the Club's disciplinary procedures as in place from time to time.

PREVENT DUTY

PREVENT is one of the four elements of "**CONTEST**", the government's counter Terrorism strategy. The four elements are:

- Pursue;
- Protect;
- Prepare; and
- **Prevent.**

PREVENT aims to stop people becoming involved in violent Extremism. The Prevent strategy responds to the ideological challenge of Terrorism and aspects of Extremism, and the threat from those who promote these views. It provides practical help to prevent people from being drawn into Terrorism and ensure they are given appropriate advice and support.

The national Prevent strategy has three specific strategic objectives:

- **Respond** to the ideological challenge of Terrorism and the threat we face from those who promote it.
- **Prevent** people from being drawn into Terrorism and ensure that they are given appropriate advice and support.
- **Work** with sectors and institutions where there are risks of Radicalisation that we need to address.

The PREVENT Duty incorporates the responsibility to promote fundamental British Values (as identified by Ofsted):

- Democracy;
- The rule of law;
- Individual liberty; and
- Mutual respect and tolerance of those of different faiths and beliefs.

The PREVENT Duty covers all forms of Radicalisation, including risk from extremist faith groups, far right Extremism and some aspects of non-violent Extremism. There are different forms of extremist organisations in the UK and the world, including:

- ‘InCel’ (involuntary celibates) culture – overwhelmingly male subculture targeting very young and vulnerable boys and men, advocating violence against women. Hate is directed at ‘Chads’ who are considered to be popular boys, and ‘Stacys’ who are the attractive women who want to go out with the Chads.
- British Defence League
- Islamic State
- Al-Qaeda
- Boko Haram
- SPEAK (animal rights)
- Irish Republican Army (“IRA”)
- Anti-Abortion groups

Identifying a Child who is being exploited or radicalised can often be difficult as there is no single factor that leads to a Child being radicalised. The signs and indicators listed below are not exhaustive and the presence of one of these factors does not necessarily mean that a Child is or has been radicalised or is involved in extremist activity. However, a combination of these factors may increase Vulnerability or may indicate that a Child needs protection and/or support.

Safeguarding from Radicalisation is no different to protecting Children from other forms of harm.

Vulnerability:

- **Identity crisis:** distance from cultural or religious heritage and uncomfortable with their place in the society around them.
- **Personal crisis:** family tensions or trauma, sense of isolation, adolescence, low self-esteem, disassociating from existing friendship group and becoming involved with a new and different group of friends, searching for answers to questions about identity, faith and seeking a sense of belonging.
- **Personal circumstances:** migration, local community tensions, events affecting country or region of origin, alienation from UK values, having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- **Unmet aspirations:** perceptions of injustice, feeling of failure, rejection of civic life.
- **Criminality:** experiences of imprisonment, poor resettlement or reintegration or previous involvement with criminal groups.
- **Experience** of poverty, disadvantage, discrimination or social exclusion.
- **Learning difficulties** and mental health support needs.
- **Experienced personal trauma**, particularly any trauma associated with war or sectarian conflict.

Behaviours:

- Using violent extremist narratives and ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Significant shift in behaviour or outward appearance that suggests a new social, political, or religious influence.
- Conflict with family over religious beliefs, lifestyle or dress choices.
- Vocal support for terrorist attacks (either verbally or written).
- Witnessed or been the perpetrator or victim of racial or religious hate crime.
- Travel for extended periods of time to international locations known to be associated with extremist groups and activity.
- Significant changes in emotional behaviour, for example, becoming withdrawn or angry.
- Sharing of views or trying to influence others with extremist Ideology.

- Ignoring or demonising viewpoints that contradict their own.
- Expressing themselves in an 'us versus them' manner about others who have alternative beliefs.
- Increasingly secretive or unwilling to discuss views.
- Changing their circle of friends.
- Losing interest in activities they once enjoyed.
- Becoming socially withdrawn or spending a lot of time online.
- Secretive about who they talk to online and which websites they visit.
- Belief in conspiracy theories and distrust of mainstream media.
- Justifying the use of violence or expressing a desire for revenge.

Access to Extremism/extremist influences:

- Association with extremist groups, associates or family engaging in extremist activity.
- Accessing the internet for the purpose of extremist activity, for example, use of closed network groups, access to or distribution of extremist material, contact associates covertly via online measures, for example, Skype and email.
- Possesses or is actively seeking to possess and/ or distribute extremist literature or other media material likely to incite racial, religious hatred or acts of violence.
- Support for groups with links to extremist activity, for example, propaganda distribution, fundraising and attendance at meetings.
- Extremist ideological, political or religious influence from within or outside UK.

REPORTING CONCERNS RELATING TO RADICALISATION AND/OR EXTREMISM

Staff must report all Concerns relating to Radicalisation and/or Extremism to the Safeguarding Team immediately and within 24-hours.

If the Concern represents an immediate threat or risk, then Staff must (in addition to reporting the Concern to the Safeguarding Team) contact:

- Police: 101 (999 in an emergency)
- Counter Terrorism Police: <https://actearly.uk/contact/>
- Report online material promoting Terrorism or Extremism. <https://www.gov.uk/report-terrorism>

RISK ASSESSMENT AND ACTION PLAN

The Club will undertake a risk assessment of where and how individuals might be at risk of being drawn into Terrorism. The level of risk will vary between Activities, geographical location, and profile of participants.

The risk assessment will consider information from external sources, such as the regional Prevent Co-ordinator, Local Authority and the Police.

The resulting Prevent Action Plan will mitigate the risks in a proportionate manner. The Club's Prevent Action Plan will be regularly monitored by the Head of Safeguarding and Welfare.

Where significant risks are identified, the Head of Safeguarding and Welfare in collaboration with senior managers, will consider what action might mitigate the impact/likelihood of that risk evolving and, where necessary, include it on the Prevent Action Plan.

All Staff in regulated activity will complete a biannual “Raising Awareness About Prevent” training. Staff must also complete the online PREVENT training as part of their Club induction.

REPORTING EXTREMIST NARRATIVES OR RADICALISATION CONCERNS

All Staff have a duty of care to report and escalate concerns using the Club’s safeguarding reporting process. For more information, see: <https://www.gov.uk/government/publications/channel-guidance>

APPENDIX 1

FURTHER EXAMPLES OF SIGNS, ACTIONS OR BEHAVIOURS WHICH MAY GIVE RISE TO CONCERNS

CHILD-ON-CHILD ABUSE

All Staff should be aware that Children can Abuse other Children (often referred to as Child-on-Child Abuse), and that it can happen both onsite and offsite. All Staff have an important role to play in preventing it and responding where they believe a Child may be at risk from it.

All Staff should understand that even if there are no reports within the Club, it does not mean it is not happening, it may be the case that it is just not being reported. It is important if Staff have any concerns regarding Child-on-Child Abuse they should speak to the Safeguarding Team.

It is essential that all Staff understand the importance of challenging inappropriate behaviours between Children, many of which are listed below, that are abusive in nature.

Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for Children and in worst case scenarios a culture that normalises Abuse leading to Children accepting it as normal and not coming forward to report it.

Child-on-Child Abuse is most likely to include, but may not be limited to:

- Bullying, (including Cyber Bullying);
- Abuse in intimate personal relationships between Children (sometimes known as “Teenage Relationship Abuse”);
- Physical Abuse;
- Sexual Abuse:
 - sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
 - sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of Abuse;
 - causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
 - consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery);
 - “upskirting”, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification,

or cause the victim humiliation, distress, or alarm, and

- Initiation/hazing type violence and rituals (this could include activities involving harassment, Abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

SEXUAL IMAGE SHARING

The Club is committed to ensuring Children are protected from the inappropriate use of their images. No images should be taken of Children without the necessary consent being obtained first including consent as to how the images will be used, especially if this is on websites and in other publications.

Staff need to be aware that where Children send naked or inappropriate photographs of themselves to other people are actually sending indecent images of Children and are therefore committing a criminal offence. Although a lot of Children may see taking, sharing or receiving images as harmless, this can have a long-term lasting effect including blackmail, Bullying, Cyber Bullying, emotional distress and presents an opportunity for grooming and non-contact Abuse to take place. Consensual image sharing, especially between older Children of the same age, may not be abusive but Children still need to know it is illegal, whilst non-consensual is illegal and abusive.

CHILD SEXUAL EXPLOITATION (“CSE”) AND CHILD CRIMINAL EXPLOITATION (“CCE”)

Both CSE and CCE are forms of Abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a Child into taking part in sexual or 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.

CSE and CCE can affect Children, both male and female and can include Children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

DOMESTIC ABUSE

Domestic Abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That Abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic Abuse. They may see, hear, or experience the effects of Abuse at home and/or suffer domestic Abuse in their own intimate relationships (Teenage Relationship Abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

MENTAL HEALTH

All Staff should be aware that mental health problems can, in some cases, be an indicator that a Child has suffered or is at risk of suffering Abuse or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff delivering education are well placed to observe Children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

If Staff have a mental health concern about a Child that is also a safeguarding Concern, immediate action should be taken, following their Child protection policy and speaking to the Designated Safeguarding Officer.

Any mental health concern regarding a Child must be reported immediately and in any event within 24-hours.

SEXUAL VIOLENCE

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

APPENDIX 2

EXTERNAL CONTACTS

Organisation	Contact details
Barnet Mash and LADO	MASH: 020 8359 2000. Barnet's LADO should be contacted via the Multi Agency Safeguarding Hub (MASH) Team .
Camhs – Barnet	020 8702 4500. Mental Health crisis helpline: 0800 151 0023
Camhs – Enfield	020 8702 4070. Mental Health crisis helpline: 0800 151 0023
Camhs – Haringey (Child and Adolescent Mental Health Service)	020 8702 3400/3401. Mental Health crisis helpline: 0800 151 0023
Camhs – Waltham Forest	0300 5551247 / walthamforest@camhs@nhs.net
Childline	0800 1111 / WWW.CHILDLINE.ORG.UK
CPSU	0116 636 65580 / WWW.THECPSU.ORG.UK
Enfield Mash and LADO	MASH: 020 8379 5212 LADO: 0208 379 4392 / safeguardingservice@enfield.gov.uk
Enfield PREVENT	Email prevent@enfield.gov.uk
Haringey Mash LADO	MASH: 020 8489 4470 / mashreferral@haringey.gov.uk LADO: 020 8489 2968/1186 / LADO@haringey.gov.uk
Haringey PREVENT	Call 020 8489 3884 / 020 8489 1280 prevent@haringey.gov.uk Strategic Lead of communities - 07976953191
NSPCC	0808 800 5000 / WWW.NSPCC.ORG.UK
Premier League Safeguarding Team	Jess Addicot (Head of Safeguarding): 07917 204890 or 0207 864 9000 or email jaddicot@premierleague.com or safeguarding@premierleague.com
The Football Association	David Gregson (Safeguarding Investigations Manager): 0800 1691863 extension 6838. david.gregson@TheFA.com
Waltham Forest Mash and LADO	MASHrequests@walthamforwest.gov.uk LADO: 020 8496 3646 / 07791 559 789 / lado@walthamforest.gov.uk