



SWANSEA CITY ASSOCIATION FOOTBALL CLUB LIMITED

CHILDREN'S SAFEGUARDING POLICY

Document History

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Revision History

The latest revision can be found at the top of the list

Revision Date	Author	Version	Summary of Changes
17 th October 2018	Rebeca Storer	V3.1	Role update
5 th September 2018	Rebeca Storer	V3.0	Legislation Update
3 rd July 2018	Rebeca Storer	V2.0	Update for 2018/19 season

Approvals

This document requires the following approvals:

Name	Version	Date of Approval	Signature
Gareth Davies	V3.1	10-19-2018	<i>G Davies</i>

Principles

Swansea City Association Football Club Limited (The Club) seeks to ensure the safety and well-being of all children and young people who engage in activities with the Club.

It is through the application of the Policy and Procedures that the Club will seek to develop a positive and proactive welfare programme to enable all children and young people to participate in an enjoyable and safe environment. This equally applies to the safety and security of those working with and responsible for the activities involving children and young people.

The Policy and Procedures have been approved and endorsed by the Board of Directors and promotes the statutory guidance for safeguarding and promoting the welfare of children. The Club will also ensure compliance with the Protection of Freedoms Act 2012 and General Data Protection Regulations.

If you work or intend to work with children or young people, you are automatically placed in a position of trust that carries authority, status, power and responsibility. If the adults involved are positive role models displaying high moral and ethical standards, the benefit to children and young people's development can be significant.

Scope

This Policy is for use across the whole Club and is to be observed by all those working with children and young people. The application of this Policy and Procedures across the Club for promoting safeguarding good practice is mandatory.

All the requirements are obligatory and are to be enforced as indicated by the appropriate persons in all cases where there are any suspected instances of poor practice or abuse.

All employees, workers, consultants, agency staff and volunteers must make themselves aware of the Club's Safeguarding Children Policy and Procedures and where appropriate their work with children and young people will be supported by a safeguarding training programme.

The Head of Safeguarding is Rebeca Storer.

The Safeguarding and Disability Access Officer is Mark Phillips.

The Club fully acknowledges and accepts its responsibility for the safety and well-being of children and young people, who engage in any way in any activity carried out with the Club.

Their welfare is of paramount importance. It is the duty of all adults working at the Club to safeguard the welfare of children and young people by creating an open and transparent environment that protects them from harm.

Activities undertaken by Club departments at the following locations are under the remit of this Policy including; *(this list is not exhaustive)*

Liberty Stadium

Swansea City AFC Academy

Fairwood Training Ground

Development Centres

Host Family Accommodation

Swans Stores

Warehouses

DEFINITION OF A CHILD

For the purposes of this policy, a child or young person is someone under the age of 18 years.

AIMS & KEY PRINCIPLES

The aims of the Club's Safeguarding Children Policy are:

- To safeguard all children and young people who interact with the Club.
- To demonstrate best practice in the area of safeguarding children and young people.
- To develop a positive and proactive welfare programme to enable all children and young people to participate in an enjoyable and safe environment.
- To promote high ethical standards throughout.

The key principles underpinning this policy are:

- The child or young person's welfare is and must always be the paramount consideration.
- All children and young people have a right to be protected from abuse regardless of their gender, race, disability, sexual orientation, religion or belief or age.
- All suspicions and allegations of poor practice or abuse will be taken seriously and responded to efficiently and appropriately.
- To ensure that staff, coaches, parents and other adults who come into contact with children and young people are good role models.
- Working in partnership with other organisations, children and young people and their parents/carers is essential.

The Role of the Head of Safeguarding is to: provide effective Club-wide strategic leadership and management with a clear sense of direction and purpose that assists the Club to deliver its safeguarding strategy, vision, values, priorities, policies and aims to promote and protect the welfare of vulnerable groups.

Main duties include but are not limited to:

- Represent and regularly report to the Board on safeguarding policies, procedures and practices within the organisation,
- Report to the Board regularly on organisational safeguarding and Duty of Care matters, including highlighting areas of risk/concern, identifying areas of poor practice/areas for improvement, and providing analysis of numbers and types of safeguarding concerns/disclosure, complaints, and bullying incidents within the organisation
- Ensure that Designated Safeguarding Officers have adequate time and resources to fulfil the requirements of their role as well as access to training relevant to the role
- Ensure that all policies relating to safeguarding and welfare are signed off by the Board annually or when required due to a change in legislation or practice
- Working with others within the organisation to create a positive, child-centred environment
- Play a lead role in developing and establishing the organisation's approach to safeguarding children, young people and adults at risk
- Manage cases of poor practice and abuse reported to the organisation
- Maintain accurate, confidential and up-to-date documentation on all cases of safeguarding and child protection and report where required in line with GDPR
- Manage referrals to children's social-care services, LADO, the police, Premier League, the EFL, the FA and the FAW as and when required
- Central point of contact for internal and external individuals and agencies
- Represent the organisation at external meetings related to safeguarding
- Coordinate the dissemination of policy, procedures and resources throughout the organisation
- Provide advice and support to all staff, volunteers and associates of the organisation in relation to safeguarding concerns and queries
- Advise on the organisation's training needs and the development of its training strategy; provide training where appropriate
- Play a lead role in maintaining and reviewing the organisation's implementation plan for safeguarding and protecting children
- Ensure safeguarding standards are met and maintained
- Keep own knowledge and skills up-to-date
- Encourage good practice by promoting and championing the safeguarding policy and procedures

The role of the Safeguarding and Disability Access Officer (SDAO) is to: Support the Head of Safeguarding to ensure continued safeguarding compliance, pro-actively promote and raise safeguarding awareness and assist with responding appropriately to safeguarding incidents, concerns and allegations.

Main duties include but are not limited to:

- Working with others within the organisation to create a positive, child-centred environment
- Play a lead role in developing and establishing the organisation's approach to safeguarding children, young people and adults at risk
- Manage cases of poor practice and abuse reported to the organisation
- Maintain accurate, confidential and up-to-date documentation on all cases of safeguarding and child protection and report where required in line with GDPR regulations
- Manage referrals to children's social-care services, LADO, the police, the Premier League, the EFL and FA as and when required
- Central point of contact for internal and external individuals and agencies
- Represent the organisation at external meetings related to safeguarding
- Coordinate the dissemination of policy, procedures and resources throughout the organisation
- Provide advice and support to all staff, volunteers and associates of the organisation in relation to safeguarding concerns and queries
- Advise on the organisation's training needs and the development of its training strategy; provide training where appropriate
- Play a lead role in maintaining and reviewing the organisation's implementation plan for safeguarding and protecting children
- Ensure safeguarding standards are met and maintained
- Keep own knowledge and skills up-to-date
- Encourage good practice by promoting and championing the safeguarding policy and procedures

Disability Access duties and responsibilities

- Have a clear and precise understanding of disability legislation and the company's responsibility to provide an accessible stadium and club premises on both match and non-match days.
- Have responsibility for the maintenance and accuracy of the Club's Access Statement.
- Liaise with departments on how they can make their services more accessible and provide the necessary support to department managers to ensure these improvements are made.
- Advise and consult with architects, surveyors, developers, designers, contractors and health and safety personnel.
- Work with Swansea Stadium Management Company and key personnel representing third party suppliers on enhancing the accessibility of our disabled supporter's experience.
- Respond to and act on, where appropriate, requests, comments or complaints from all concerned with disability access, including issues raised by supporters, the Disabled Supporters Association or the Club's Disability Liaison Officer.
- Submit reports to senior management on accessibility and support all required paperwork/reports per UEFA licensing rules working with the Club's Football Secretary.
- Prepare budgets based on the required access improvements.

- Take responsibility for the general upkeep of all disability and accessibility related items on the Club's website.
- Work closely with the Club's media and communications team, as well as external agencies, to ensure the website meets standard guidelines and to seek continuous improvements.
- Keep the Club informed of any new policies/legislation relating to disability and accessibility requirements.

RECRUITMENT & DISCLOSURE (See DBS Policy for further information)

The Club complies with the safe recruitment procedures as set out in The FA Premier League Rules Season 2018/2019 (in particular Section S, The Safeguarding of Vulnerable Groups and Safer Recruitment) and Club's Disclosure and Barring Service Policy. As part of the Club's recruitment and selection process, offers of work for positions which involve working with children and young people in regulated activity are subject to a satisfactory enhanced Disclosure & Barring Service check. Those being employed in a non-regulated activity role will still be subject to a DBS check at the level deemed suitable for the position offered. Appropriate references will also be obtained. The Club is registered with The GB Group, who provide an online platform for completing disclosure checks.

All offers of work are subject to a satisfactory outcome of the screening process and until such time as a satisfactory disclosure has been confirmed, the individual concerned will not be permitted to commence work. Supervision arrangements, pending the results of checks, are only suitable for non-regulated activity roles.

(Employers must ensure that those engaged in Regulated Activity are not barred from doing so prior to offering an applicant the role).

All employees, workers, and volunteers in a position of trust will be required to undergo regular DBS disclosure clearances, normally every 3 years or earlier if requested. Should an individual's DBS disclosure reveal any relevant criminal history the Club will consider whether the nature of the offence/offences renders the person concerned unsuitable for working with children and young people. In such circumstances, when the nature of any disclosure has to be considered, a risk assessment will be carried out to assess the information contained within the disclosure certificate. The individual may also be asked to attend an interview prior to a recruitment decision being made. A final decision as to whether or not that individual works with or continues to work with the Club will be in accordance with the Club's DBS Policy.

All new employees, workers and volunteers working with children or young people at the Club will be required to complete a self-declaration on commencement of duties.

TEMPORARY STAFF AND CONSULTANTS

The Club will ensure that all agency staff and consultants working with children sign a self-declaration form, where appropriate, prior to engagement. They will not have unsupervised access to children and young people during their time with the Club.

STAFF TRAINING

All staff working in direct contact with children and/or young people shall be required to attend an Induction Presentation when commencing their role at the Club as well as completing a degree of Safeguarding training. However, the level and depth of such training is dependent on the level of contact with children their job role requires.

Typically, the training courses staff will undertake will include, but are not limited to; The FA/FAW Safeguarding Children in Football Workshop and The Premier League's Guidance For Safer Working Practice. Other more specialised courses may also be identified and included as part of the Club's approach to raising the safeguarding awareness levels and best practice.

Details of those satisfactorily completing these courses are retained by the Designated Safeguarding Officer.

RESPONSIBILITY OF SAFEGUARDING CHILDREN – POSITION OF TRUST AND DUTY OF CARE

The Club acknowledges its responsibility to safeguard the welfare of every child and young person who has been entrusted to its care and is committed to working to provide a safe environment. All employees, workers, consultants, agency staff and volunteers are accountable for the way in which they exercise authority, manage risk, use resources and protect children from discrimination and avoidable harm. To ensure best practice at all times employees, workers, consultants, agency staff and volunteers must be fully aware of this Safeguarding Children Policy and Procedures and the responsibilities. All staff have a duty of care to keep children and young people safe; this can be exercised through the development of respectful, caring and professional relationships. Staff must demonstrate integrity, maturity and good judgement whilst working with children and young people.

Any person responsible for a child or young person, whether solely or jointly, is in a position of trust which requires behaviour to be in accordance with this policy. Examples of positions of trust (*but are not limited to*) include;

A Head of a Department, member of Academy staff or volunteer working with children, a football coach, a team manager, a physiotherapist, a scout, a driver, a learning mentor/tutor, as well as staff engaged in match day activity involving children and young people, including supervising mascots, stewards, hosts/hostesses, catering personnel and photographers.

PROTECTING CHILDREN & YOUNG PEOPLE WITH DISABILITIES & ADDITIONAL VULNERABILITIES

Children or young people with disabilities or additional vulnerabilities gain enormous benefit from participating in sport. For many years children and young people with disabilities or additional vulnerabilities were not considered to be vulnerable to abuse. It is now known, through research, that this is not the case and they are at an increased risk of abuse and that the greater the disability the greater the risk.

There are a number of factors that contribute to this and these include:

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

Children and young people with disabilities may also be less valued than their peers and poor care may be observed but tolerated by others. This might include such things as not speaking directly to the child or young person; not offering choices; not moving and handling them safely; not respecting their privacy and dignity; not treating them according to their age; allowing physical restraint to occur; or using derogatory language.

There is no one way to ensure that children and young people with disabilities or extra vulnerabilities are protected but the safest environments are those that help children and young people to protect themselves by helping them to speak out and do their best to stop

abuse from happening and take responsibility for observing, challenging and reporting poor practice and suspected abuse.

Safe environments for children and young people with disabilities are also safer for all children and young people.

A safe environment is one where:

- The possibilities of abuse are openly acknowledged and discussed by adults.
- Training in awareness takes place.
- Policies and Procedures are known by all and followed.
- There is support for those who report suspicions or concerns.

In addition, safe environments:

- Ensure that those working with children and young people learn the child or young person's communication method. They may need help to do this.
- Ensure that the child or young person's health needs are known, recorded and that sufficient people know how to respond. This may mean knowing how to manage a seizure or an asthma attack. It may mean ensuring that medication is kept to hand, administered correctly, and recorded.
- Ensure a mobile phone is available and switched on.
- Discuss with parents or carers any physical care that is required and how this can best be done with respect and dignity. This will usually mean same gender carers, and consistent carers or supporters.
- Consideration needs to be given to the balance of the need for privacy with the need for accountability and protection against allegations for carers. This is best done by consulting with parents or carers and the child or young person concerned.
- Give the child or young person every opportunity to make informed choices and respect their choice.
- Have clear strategies for dealing with difficult behaviour that excludes any kind of physical punishment or restraint.
- Listen to and advocate for children and young people.
- Involve children or young people and their families wherever possible in the Club's provision for the activities in which they participate. This helps give all children and young people a voice and may act to deter abusers.

GOOD PRACTICE

All employees, workers, consultants, agency staff and volunteers working with children or young people should adhere to the following principles and action (*list is not exhaustive*):

- Be a role model, displaying consistently high standard of behaviour and appearance (*disciplined/committed/time keeping*).
- Always use language that is appropriate and socially acceptable.
- Always work in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication with no secrets).
- Make the experience of the sporting activity fun and enjoyable: promote fairness, confront and deal with bullying.
- Treat all children and young people equally and with respect and dignity.
- Always put the welfare of the child or young person first.
- Maintain a safe and appropriate distance with children and young people and avoid unnecessary physical contact.
- Where any form of manual/physical support is required it should be provided openly and with the consent of the child or young person. Physical contact can be appropriate

so long as it is neither intrusive nor disturbing and the child or young person's consent has been given.

- If groups have to be supervised in changing rooms always ensure coaches etc. work in pairs.
- Request written parental consent if Club officials are required to transport children and young people.
- Gain written parental consent for any significant travel arrangements e.g. tours/overnight stays.
- Coaches are qualified and a qualified first aider is in attendance.
- Ensure that at away events adults should not enter a child or young person's room or invite children and young people to their rooms.
- Always give enthusiastic and constructive feedback rather than negative criticism.
- Secure written parental consent for the Club to act in loco parentis, to give permission for the administration of emergency first aid or other medical treatment if the need arises.
- Keep a written record of any incidents or injury that occurs, along with details of action taken and any treatment given.
- All other good practice/common sense principles given the varying situations.

POOR PRACTICE

The following are regarded as poor practice and should be avoided by all employees, workers, consultants, agency staff and volunteers (*list is not exhaustive*):

- Unnecessarily spending excessive amounts of time alone with children and young people away from others.
- Being alone in changing rooms, toilet facilities or showers used by children and young people.
- Taking children or young people alone in a car on journeys, however short.
- Taking children or young people to your home where they will be alone with you.
- Sharing a room with a child or young person.
- Engaging in rough, physical or sexually provocative games, including horseplay.
- Allow or engage in inappropriate touching of any form.
- Allowing children or young people to use inappropriate language unchallenged.
- Making sexually suggestive comments to a child or young person, even in fun.
- Reducing a child or young person to tears as a form of control.
- Allow allegations made by a child or young person to go unchallenged, unrecorded or not acted upon.
- Do things of a personal nature that the child or young person can do for themselves.

IF IN DOUBT....DON'T.

Challenging poor practice such as racism, homophobia, bullying, foul, aggressive or provocative language or any controlling behaviour that upsets children or young people is vital. Never ignore bullying or verbal abuse by parents, coaches, children or young people. Listen to and support the person being targeted. Explain to the bully that this is unacceptable.

SIGNS, INDICATORS AND FORMS OF POOR PRACTICE AND ABUSE

“Child Abuse” is a term used to describe what happens when a person, or a group of people, harm a child or young person under the age of 18. Abuse and neglect are forms of maltreatment of a child; somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children and young people may be abused in a family, institutional or community setting, by those known to them or, more rarely by a stranger. They may be abused by an adult or adults, or another child/children or young person.

There are five types of abuse to be aware of that can arise in a football situation, they are as follows;

- **Neglect,**
- **Physical Abuse,**
- **Sexual Abuse,**
- **Emotional Abuse,**
- **Bullying.**

*Full details of signs and indicators of abuse can be found in **Appendix 1** at the end of this policy.*

WHAT TO DO IF YOU SUSPECT ABUSE OR POOR PRACTICE HAS OCCURRED?

If you are concerned about the welfare of a child or young person or you are concerned about an adult’s behaviour towards a child or young person you must act. Do not assume that someone else will help the child. Safeguarding children is everyone’s responsibility. It is important that you report your concerns to either one of the following:

- **Head of Safeguarding**
- **Safeguarding and Disability Access Officer**

TAKING NO ACTION IS NOT AN OPTION

WHAT TO DO IF YOU RECEIVE A SAFEGUARDING DISCLOSURE FROM A CHILD OR YOUNG PERSON

Children or young people who may be vulnerable are likely to disclose abuse to those they trust and how one responds to a disclosure is crucial.

Stage 1

Deal with the disclosure as it happens and ensure that the child or young person’s immediate needs are met and that they feel supported. When a disclosure is made, it is most important to understand that you must not investigate the disclosure yourself. The disclosure must always be taken seriously and dealt with according to the guidance in this Policy and Procedures, even if the truth of the disclosure is uncertain. You are not expected to act as a social worker, counsellor, judge, and jury or avenge the abuser; you are however expected to act in the best interest of the child or young person who may be at risk.

You must:

- Put your own feelings aside and listen as if the information is not sensational.
- Allow the child/young person to lead the discussion and to talk freely.
- Listen to what the child/young person is saying. Try not to interrupt them or ask lots of questions. Being asked a lot of questions can feel like being interrogated.
- Let them tell you at their own pace. Don't worry if the child/young person stops talking for a while - silences are OK. You don't have to rush in to fill the gaps.
- Accept what the child/young person says without challenge.
- Listen to the child/young person without investigating.
- Allow the child/young person to talk but protect them from sharing the information with too many other people.
- Provide reassurance that you are taking them seriously.
- Let the child/young person know it is recognised how hard it is for them to tell.
- Reassure them that they are doing the right thing by disclosing.
- It is ok to let them know if you are unable to answer all their questions.
- Avoid using questions such as "Is there anything else you would like to tell me?"
- Avoid asking leading questions like "Did the coach hit you?"
- Never ask questions that may make the child/young person feel guilty or inadequate.
- If physical abuse has taken place, you may observe visible bruises and marks but do not ask a child/young person to remove or adjust their clothing to observe them.
- Tell the child/young person who you will be contacting e.g. the Safeguarding and Disability Access Officer or the Head of Safeguarding, statutory agencies etc. and that you will support them through that process.
- Once you have established that they have been harmed or are at risk of being harmed, do not pursue the conversation any further. This is important to ensure that questions cannot be raised later about possible manipulation of the disclosure.
- Respect the confidentiality of the disclosure and do not share the information with anyone other than those who need to know. Those who need to know are those who have a role to play in protecting child/young person.

You must not:

- Panic or show that you are shocked. It is important to remain calm and in control of your feelings.
- Document or record the conversation while the child/young person is disclosing. This should be done as soon as possible after the child/young person has disclosed to you.
- After the child/young person has disclosed, the conversation must be documented remembering as accurately as you can, the words and phrases used by the child/young person to describe what has happened to them.
- Investigate but do listen and reassure the child/young person that they are doing the right thing by disclosing.
- Give the impression that you might blame the child/young person e.g. Don't ask: "why did you let him?", "what were you doing there anyway?" or "why didn't you tell me before?".
- Press for details by asking questions such as "What did he/she do next? "
- Ask leading questions.
- Pass judgement on what is said but do try to alleviate any fears or guilt which the child/young person may have.
- Make false promises and/or promise confidentiality – it should be explained that the child/young person has done the right thing, who will need to be told and why.
- Approach the alleged abuser yourself.

Do remember, when a child/young person makes a disclosure they may feel:

Guilt: They may blame themselves for the abuse and often feel guilt for telling.

Ashamed: They may feel ashamed about the abuse itself.

Confused: They may be confused about their feelings for the alleged abuser.

Scared: They may be fearful of the repercussions of telling. They may be scared of the alleged abuser.

Be careful about touching (e.g. hugging or cuddling) the child/young person if they have not initiated the contact. They may be upset by physical contact.

Stage 2

As soon as possible, once the immediate comfort and safety of the child/young person is secured, you must inform the Safeguarding and Disability Access Officer or the Head of Safeguarding of the disclosure. You may make a referral yourself directly to a statutory agency if you are concerned about the child/young person's immediate safety and/or are having difficulty contacting the designated safeguarding person/s or if the designated safeguarding person is the alleged abuser. Every effort should be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a need to know basis only.

Stage 3

You should note down details as soon as possible after the disclosure has been made. What is clearly etched at the time can become blurred after a few hours. It is vital that you make clear and concise notes soon after the disclosure in order to complete a more detailed record and incident sheet later.

Immediate notes should include:

- Date and time
- Place and context of disclosure or concern
- Important facts provided, e.g. names of alleged victim and alleged perpetrator (if available).
- Who you are and your role and contact details at the Club.
- Any action taken.
- Current position including any concerns about safety of the alleged victim and any other person.
- How aware of the referral is/are the victim, perpetrator, parents or relatives.

Wherever possible, you must record information as it was told to you using the language of the child/young person rather than your own interpretation of it.

It is important to report factual information rather than assumption or interpretation. You might convey your intuitive thoughts, but these should be recognised as such and should not form part of the record.

What happens next?

It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. You should be informed by the Safeguarding and Disability Access Officer or the Head of Safeguarding what has happened following the report being made.

A disclosure is not the only way that you may be made aware of a problem. Sometimes another adult or even a child may say something about a possible abusive situation.

On occasions you may witness an incident that may cause concern or indeed you may pick up on things that cause concern or information may be passed to a coach or manager anonymously by a person or persons who do not want to be directly involved for whatever reason. However, you come upon information that causes concern and may put others at risk, the result should always be the same: -

TAKING NO ACTION IS NOT AN OPTION

Full contact details can be found in **Appendix 6**.

All matters will be fully investigated and appropriate action will be taken. Action may include referral to the Police, Children Services, Premier League or The FA Case Management Team as appropriate and if seen to be required by the Head of Safeguarding. Any referral to an external agency shall also be reported to the Board of Directors..

REMEMBER THE CHILD'S WELFARE IS OF PARAMOUNT IMPORTANCE.

SAFEGUARDING PROCEDURES

The Club takes any form of safeguarding poor practice or abuse seriously to promote a culture of best practice and accountability.

The Club encourage all employees, workers, consultants, agency staff and volunteers to raise concerns they may have about any safeguarding poor practice or abuse as early as possible to the designated personnel. We will respond appropriately to promote a safer Club. If you have any questions regarding this section of the Safeguarding Children Policy and Procedures, please contact the Safeguarding and Disability Access Officer or the Head of Safeguarding.

PROCEDURE FOR RAISING A SAFEGUARDING CONCERN

How to raise a concern

You do not need to have firm evidence before raising a concern. But we do ask that you explain as fully as you can the information or circumstances that gave rise to your concern.

Step 1

If you have a concern of any form of safeguarding poor practice or abuse, raise it first with the Safeguarding and Disability Access Officer, who will raise it with the Head of Safeguarding

Step 2

If you feel unable to raise the matter with the Safeguarding and Disability Access Officer for whatever reason, raise the matter with Head of Safeguarding.

Step 3

If these channels have been followed and you still have concerns, or if you feel that the matter is so serious that you cannot discuss it with any of the above, please contact:

The Head of Safeguarding at the Premier League on 020 7864 9173

The Safeguarding Manager at the EFL on 01772 325940

Steps will then be taken to fully investigate the matter to decide what appropriate action should be taken.

The Club is committed to protecting children and young people and will take action to uphold this commitment.

USE OF PHOTOGRAPHY & FILM IMAGES

The Club takes its guidance on the use of images from guidelines issued by The FA and Premier League/EFL. All images are taken by Club officials who have been briefed by the Safeguarding and Disability Access Officer or by a member of the Media and Marketing Department responsible for the activity being photographed or filmed. Before taking images of children or young people, parental consent is sought in writing at the start of the season or prior to the event.

Parents/Carers are responsible for informing the Club of any change of circumstances within the season which may affect consent.

Parents/Carers will be informed of how the image will be used. The Club will not allow an image to be used for something other than that for which it was initially agreed.

- All children or young people featured in Club publications will be appropriately dressed.
- Where possible, the image will focus on the activity taking place and not a specific child.
- Where appropriate, images represent the broad range of people participating safely in the event.
- The Media Department will, where applicable, undertake a DBS check and attend a FA/FAW Safeguarding Children in Football workshop. Club Identification will be worn at all times.
- Children who are the subject of a court order will not have their images published in any Club document.
- No images of children featured in Club publications will be accompanied by personal details such as their home address.
- Recordings of children for the purposes of legitimate coaching aids are only filmed by Club officials and are stored safely and securely at the Club's premises.
- Mobile phone cameras are not to be used in changing rooms.
- Any instances of inappropriate images in football should be reported to a Safeguarding Officer.
- The Club does not put young player profiles with images and personal information on its website.

SOCIAL NETWORKING GUIDANCE

The Club recognises that social media and social networking services provide opportunities to effectively engage with a wide range of audiences in a positive manner. However, the Club is also aware of the potential safeguarding risks especially to children and young people when using these forms of media.

Do not add/invite children or young people you have responsibility for in football as 'friends' within social networking sites such as SnapChat, Instagram, Facebook etc.

Avoid 'one to one' electronic communications. Where you do communicate electronically ensure you send this communication to the parent/carer as well as the child or young person.

GOOD PRACTICE WITH SOCIAL MEDIA

When working with children and young people you should always encourage them to:

- Ensure their privacy settings are set as high as possible;
- To have private profiles on social networking sites including Twitter and Instagram;
- Not to indulge in any form of 'Sexting'. By having in their possession or distributing indecent images of a person under 18 on to someone else – young people need to be aware that they could be breaking the law as these are offences under the Sexual Offences Act 2003.
- Ensure they are aware that Apps like SnapChat do not always destroy the image as other users have the ability to capture the images and store or share them;
- To report any inappropriate images or things that concern them to the designated Safeguarding Team;
- To report any cyber bullying, harassment or images and content that cause offence;
- To behave in a safe and appropriate way online and not put themselves or others at risk.

Online Grooming; this is where an adult (someone over the age of 18) uses the internet and social media to befriend and entrust a child or young person for future sexual abuse, image production or exposure. Children or young people may befriend someone online and that person may use sexual language with the child and also send gifts or pretend they are in a relationship with the child.

As with other abuse, the signs and indicators are similar, however with online grooming there are more specific indicators including;

- Children spending an alarming amount of time online in isolation of other family members;
- Children having lots of new gifts not brought by family members;
- Children being picked up by different people (who the family do not know in cars);
- Children saying they are dating someone they met online and it is apparent the person is older.
- Children using dating sites.

Cyberbullying; The use of electronic and digital media to scare, harass or intimidate another person.

CHILD SEXUAL EXPLOITATION (CSE)

CSE involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts to serious organised crime from groups or gangs.

What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim.

PREVENT – Preventing Radicalisation/Tackling Extremism

The Government's PREVENT duty came into force on the 1st July 2015 and involves protecting children from the risk of radicalisation. Key Club staff will be trained, informed and able to recognise vulnerability and mitigate the risks. Currently there a number of factors that can make young people vulnerable to radicalisation and if there are any such concerns about a child or young person a member of the Safeguarding team must be notified immediately.

RATIOS AND SUPERVISION OF CHILDREN & YOUNG PEOPLE

Any activity undertaken by the Club will always give full consideration to the appropriate number of staff members available depending on the age of the Children involved, the degree of risk the activity involves and whether there are any additional vulnerability or disability needs. The lower the age of the participants, the greater the need for supervision.

Regardless of ratios a minimum of two members of staff or delivery partner will always be available to supervise an activity. This ensures that at least basic cover in the event of something impacting on the availability of one of the adults during the activity.

TOURS AND TOURNAMENTS

The Club encourages participation in professionally organised tournaments both domestically and abroad for the Academy. The Premier League tournaments, which are organised to expand the games programme, are fully risk assessed by Premier League staff and Club staff and players attending adhere to the Tournament Codes of Conduct. Tournaments not organised by the Premier League will follow similar risk assessment procedures, as set out in The Premier League Rules 2018/2019 Season (Section S – Appendix 13).

A Tour Leader will be appointed by the Club department for each individual tour and they will designate roles and responsibilities to other staff members. If necessary, a Pre-Tour Risk Assessment visit will be arranged for each new tournament. The Pre-Tour Risk Assessment covers both Health & Safety and Safeguarding areas and will include modes of transport, hotel or other accommodation, evacuation procedures, climate conditions, tournament match schedules and food provision.

Tours have full insurance cover and are fully staffed to ensure appropriate supervision arrangements and medical support & equipment are available. A pre-tour presentation is provided for parents/carers so they are fully informed on the whole tour procedure prior to the group travelling.

ACADEMY YOUTH LOANS, TRIALS & WORK EXPERIENCE

If an Academy player or young professional under the age of 18 joins another club on trial, work experience or a Football League Youth Loan the Academy will seek written parental consent (additional to the standard consent sought at the start of every season) prior to the activity taking place.

Consideration will also be given to the player's education programme, travel and accommodation arrangements. If the new club is not located within a reasonable travelling distance from the player's current address the Club will insist that, where possible, the players are placed in host family accommodation during their time away from the Club and not in hotel accommodation. To ensure best practice the Club has appointed a team of staff to be responsible for the whole loan player arrangements and will support the player in finding an appropriate loan club, as well as providing regular visits and communication during the loan period.

For players under the age of 18 who are joining the Club on trial, parental consent will be sought prior to the trial taking place, along with a full medical history and injury disclaimer. Where accommodation is required, this will be in a designated host family accommodation or, if the player's parent is also travelling, a local hotel may be used as an alternative. The player will be fully supported by the Player Care and Welfare Officer during their stay and transportation will be also be arranged.

UNDER 18, 23 & FIRST TEAM PROGRESSION

As players progress through the Academy system they may have the opportunity, before their 18th birthday, to train and play with the First team. Obviously, this carries a number of safeguarding concerns, as they will be entering an adult environment and be susceptible to adult behaviours and language. The Club will support the player/s during this transition and their first point of contact for guidance and support will be the First team player liaison staff. Parents will be included, and consent sought.

CONFIDENTIALTY & DATA PROTECTION

Employees, workers, consultants, agency staff and volunteers may have access to confidential information about children and young people in order to undertake their responsibilities and may be given highly sensitive or private information. They should never use confidential or personal information about a child or young person or his/her family for their own or others' advantage.

Confidential information about a child or young person should never be used casually in conversation or shared with any person other than on a need-to-know basis. In circumstances where the child or young person's identity does not need to be disclosed, the information should be used anonymously.

There are some circumstances in which an employee, worker, consultant, agency staff or volunteer may be expected to share information about a child, for example when abuse is alleged or suspected. In such cases, individuals have a duty to pass information on without delay, but only to those with designated safeguarding responsibilities.

If an employee, worker, consultant, agency staff or volunteer is in any doubt about whether to share information or keep it confidential, they should seek guidance from the Data Protection

Officer. Any media or legal enquiries should be referred to the Club Secretary or, in their absence, to their deputy.

The storing and processing of personal information about children is governed by the Data Protection Act 2018 and the General Data Protection Regulations (GDPR). For further information on the Club's (and your) obligations under the Data Protection Act 2018 and GDPR, please see the Club's Data Protection Policy, available on the Club Website.

This means that employees, workers, consultants, agency staff and volunteers;

- Are expected to treat information they receive about children in a discreet and confidential manner;
- Should seek advice from the HR Department if they are in any doubt about sharing information they hold or which has been requested of them.

SAFEGUARDING CHILDREN POLICY & PROCEDURES

Appendices

Appendix 1

Signs & Indicators of Abuse.

Appendix 2

Concerns about the behaviour of the organisation's staff member or volunteer

Appendix 3

Concerns about the behaviour of another organisation's staff member or volunteer

Appendix 4

Concerns about children and young people arising outside of sport

Appendix 5

Other applicable Club Policies & relevant Legislation/Regulations.

Appendix 6

Key Safeguarding Contacts

Appendix 1

Signs and Indicators of Abuse

One or more of the following might trigger concerns about a child:

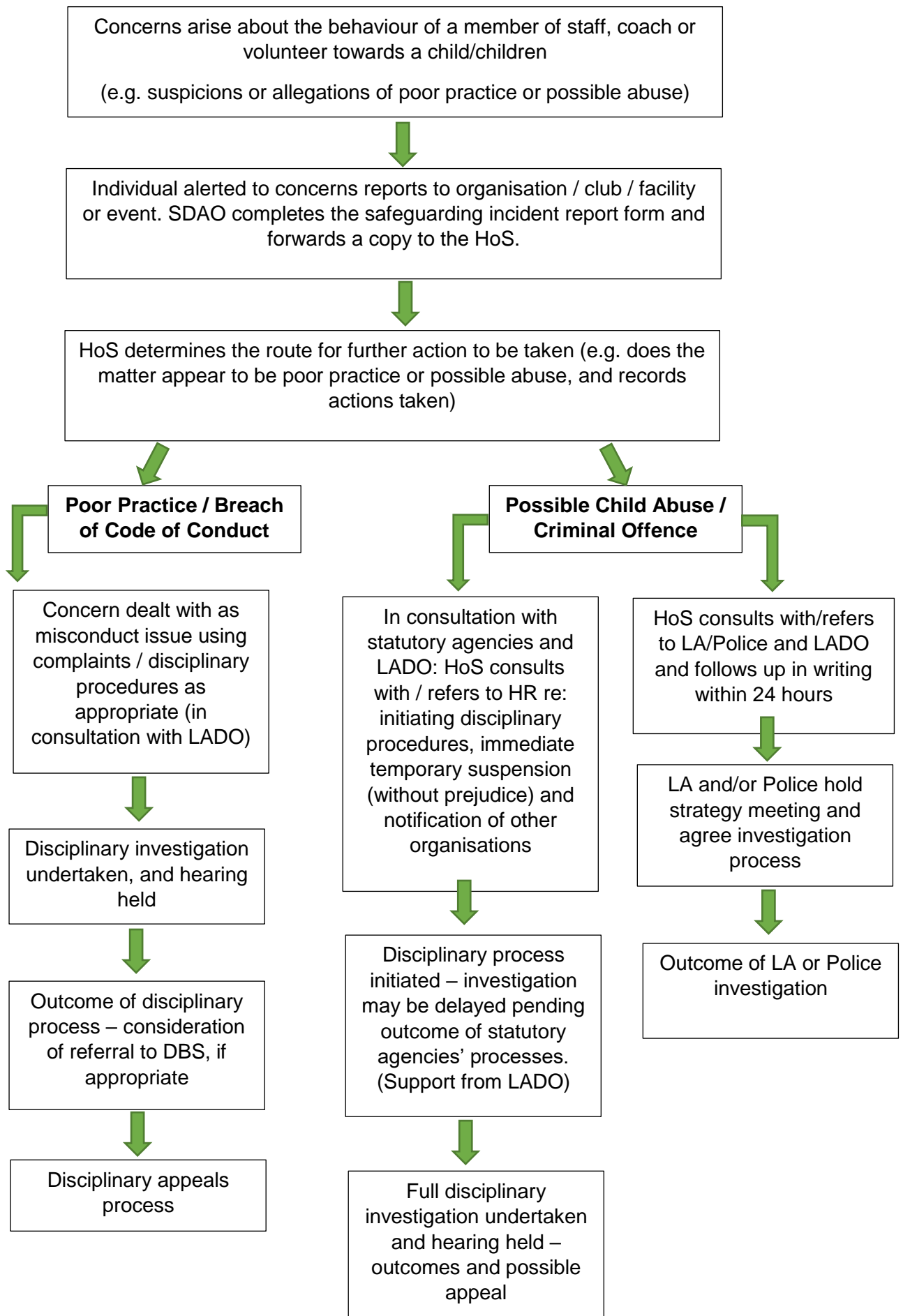
- A sudden change in behaviour
- Something a child says
- Physical signs of abuse

The signs may vary according to the age and understanding of the child.

Category of abuse	Physical signs	Behavioural signs
Physical abuse	Physical signs such as unexplained and unusual bruising, finger and strap marks, injuries, cigarette burns, bite marks, fractures, scalds, missing teeth.	Behavioural signs such as fear of contact, aggression, temper, running away, fear of going home, reluctance to change or uncover body, depression, withdrawal, bullying or abuse of others.
Neglect	Physical signs such as constant hunger, ill-fitting or inappropriate clothes, weight change, untreated conditions, continual minor infections, failure to supply hearing aids, glasses and or inhalers.	Behavioural signs such as always being tired, early or late, absent, few friends, regularly left alone, stealing, no money, parent or carer not attending or supportive.
Sexual abuse	Physical signs such as genital pain, itching, bleeding, bruising, discharge, stomach pains, discomfort, pregnancy, incontinence, urinary infections or STDs, thrush, anal pain on passing motions.	Behavioural signs such as apparent fear of someone, nightmares, running away, sexually explicit knowledge or behaviour, masturbation, bed-wetting, eating problems, substance abuse, unexplained money or gifts, acting out with toys, self-harm.
Bullying	Physical signs such as weight change, unexplained injuries and bruising, stomach and headaches, bed-wetting, disturbed sleep, hair pulled out.	Behavioural signs such as difficulty making friends, anxiety over school, truancy, withdrawn, anger, moodiness, suicide attempts, reduced performance, money and possessions reported as lost, stealing from within the family, distress and anxiety on reading texts or e-mails.
Emotional abuse	Physical signs such as weight change, lack of growth or development, unexplained speech disorders, self-harm, clothing inappropriate for child's age, gender or culture etc.	Behavioural signs such as unable to play, fear of mistakes, fear of telling parents, withdrawn, unexplained speech and language difficulties, few friends.

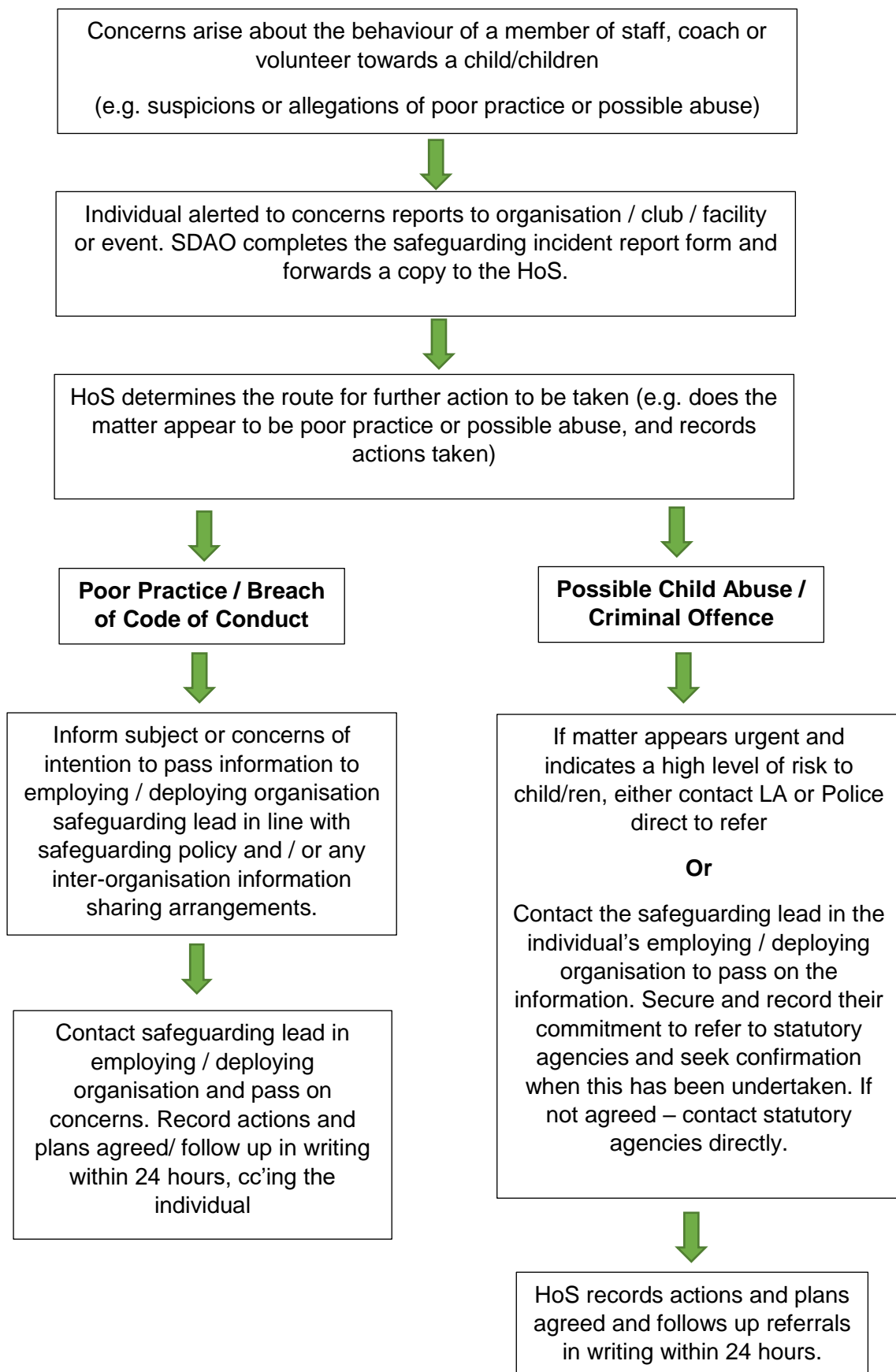
Appendix 2

Concerns about the behaviour of the organisation's staff member of volunteer



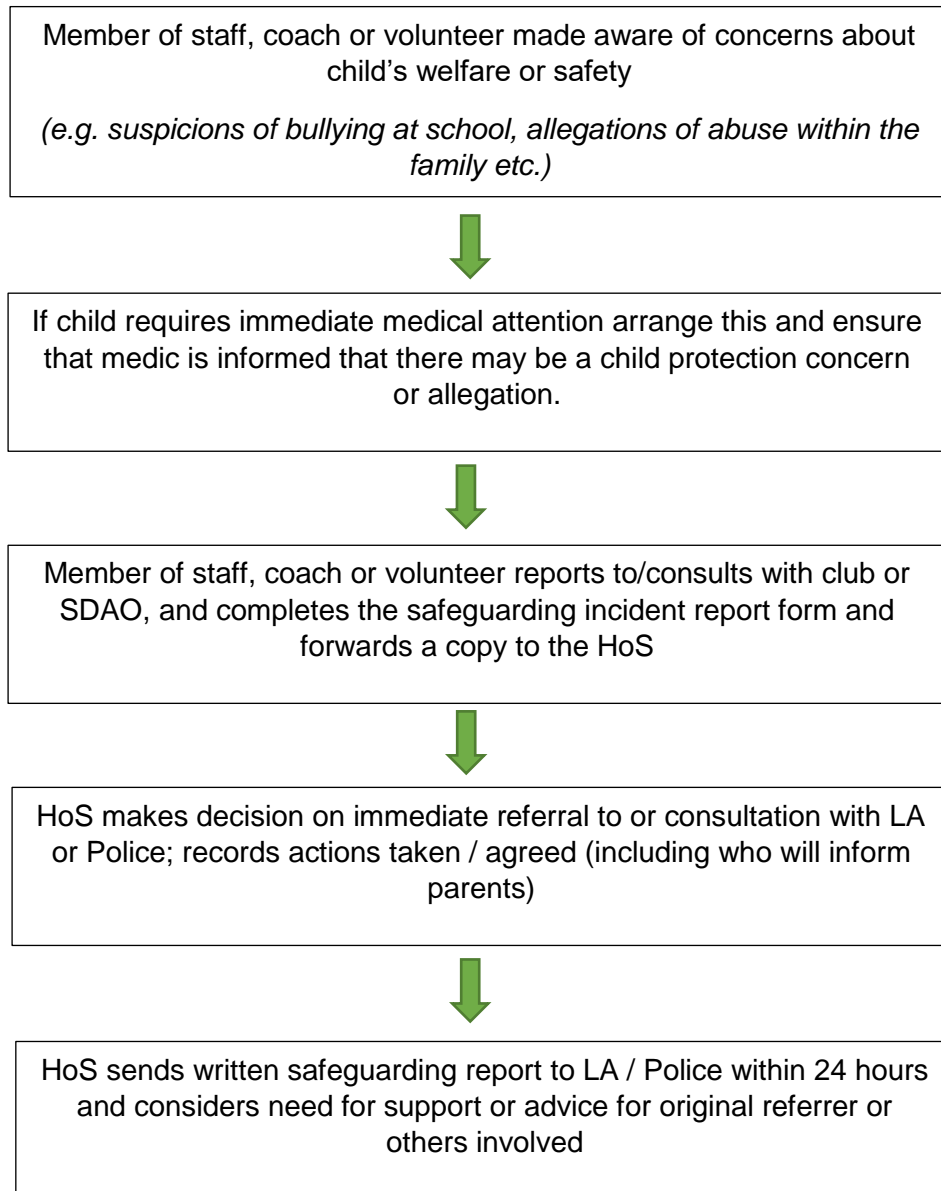
Appendix 3

Concerns about the behaviour of another organisation's staff member or volunteer



Appendix 4

Concerns about children and young people arising outside of sport



Appendix 5

Other Applicable Club Policies*

- Anti-Bullying Policy
- Code of Ethics, Conduct & Behaviour.
- Data Protection Policy.
- Disciplinary Procedure
- Equality & Promoting Diversity Policy.
- Health & Safety Policy.
- DBS Policy and Recruitment of Ex-Offenders Policy
- Social Media Policy
- Information and Communications Policy
- Whistleblowing Policy.

* all are subject to annual review

Relevant Legislation/Regulations:

- Social Services and Well-being (Wales) Act 2014
- City of Swansea Inter-Agency Safeguarding Adults Policy & Procedures.
- United Nations Convention of the Rights of the Child 1989
- United Nations Convention on the Rights of Disabled People
- Wales Accord for the Sharing of Personal Information
- Children Act 1989 and 2004
- Well-being of Future Generations (Wales) Act 2015
- Care Act 2014.
- Care Standards Act 2000.
- Counter Terrorism & Security Act 2015.
- Equality Act 2010.
- Human Rights Act 1998.
- Mental Capacity Act 2005 (revision 2007)
- Protection of Freedoms Act 2012.
- Protection of Vulnerable Adults List 2004.
- Sexual Offences Act 2003.
- Safeguarding Vulnerable Groups Act 2006.
- Data Protection Act 1998
- General Data Protection Regulations
- Public Interest Disclosure Act 1998
- Serious Crimes Act 2015

Please note that these lists are not exhaustive.

Appendix 6

Key Safeguarding Contacts

Senior Lead Safeguarding – Gareth Davies	01792 616622
Head of Safeguarding – Rebeca Storer	01792 616419
Safeguarding and Disability Access Officer – Mark Phillips	01792 616611
Player Care and Welfare Officer – Anthony Avo	01792 556521
Development Coordinator – Adam Mahoney	01792 556526
Head of Development – Jamie Thomas	01792 556526
Safeguarding Officer – Kieran Howard	01792 556528
Safeguarding Officer – Nicola Butt (HR)	01792 616548
Safeguarding Officer – Lucy Norman (Equality)	01792 616634
Safeguarding Officer – Richard Deakin (H&S)	01792 616629

Appendix 6 continued

Key Safeguarding Contacts

The Premier League Head of Safeguarding	Jess Addicott 020 7864 9173 safeguarding@premierleague.com
The EFL Safeguarding Manager	Alex Richards 01772 325940 safeguarding@efl.com
Emergency Services	101 - non-urgent calls 999 - emergencies
NSPCC	0808 800 5000 (24 hour helpline)
Child Line	0800 1111 www.childline.org.uk
Child Protection in Sport Unit	0116 366 5590 cpsuwales@nspcc.org.uk www.thecpsu.org.uk
E-safety	www.thinkuknow.co.uk www.ceop.police.uk