Safeguarding Children and Young Person Policy

This procedure is endorsed by the Company's Senior Management Team and will be reviewed regularly. This procedure may be changed from time to time, and you will be informed of any such changes. This policy is non contractual.

Statement of Intent from the Board

Sheffield Wednesday Football Club and Sheffield Wednesday Football Club Community Programme, referred to as SWFC, are committed to safeguarding the welfare of children, young people and adults. SWFC will ensure the safety of all those with whom we engage and meet. We expect all staff, players, volunteers, participants, contractors and guests to share this commitment.

SWFC acknowledge and accepts a statutory obligation and responsibility for the wellbeing and safety of all children and young people who are under the club and/or Community Programme's care or are utilising our facilities. Everyone working at SWFC has a duty of care to safeguard the welfare of children and young people by creating an environment that protects them from harm.

The wellbeing of children is paramount, and all staff must make themselves conversant with this policy. The following guidelines will be supplemented by in-service training and additional guidance accordingly.

Definitions

A 'Child' (collectively referred to as 'Children') is defined as anyone under the age of 18.

An 'Activity' means any activity or series of activities arranged for a Child or Children by or in the name of the Club and/or Community Programme (SWFC). These are deemed to be regulated and therefore activate the required levels of Criminal Record Checks that are associated.

Rules and Regulations

All staff, players, volunteers, participants, contractors and guests have a responsibility to report any concerns about the welfare of any child, young person or vulnerable adult.

SWFC are committed to ensuring that:

- The safety and welfare of children, young people and vulnerable adults under our care is paramount.
- All children, young people and vulnerable adults that engage with the club and/or Community Programme, regardless of age, culture, social background, disability, gender, language, racial origin, religious belief and/or sexual identity have the right to safety and protection from abuse or harm.
- All suspicions, reports and/or allegations of abuse will be taken seriously and investigated thoroughly which may involve the appropriate Local Authority teams where necessary.

Aims

Through this policy Sheffield Wednesday Football Club and Sheffield Wednesday Football Club Community Programme (SWFC) aim to:

- Safeguard all children, young people and vulnerable people that meet the club and/or Community Programme.

- Demonstrate best practice in safeguarding children, young people and vulnerable adults.
- Increase awareness and understanding of safeguarding issues.
- Provide guidance for parents and carers on understanding the reporting procedures.
- Provide guidance for staff, players, volunteers, contractors and guests on understanding the reporting procedures.
- Ensure that coaches, parents, participants, staff, players and other adults who meet children, young people and vulnerable adults provide good role models for behaviour.
- Promote high ethical standards throughout SWFC and/or SWFCCP.

Rules Regulations and Guidance

SWFC are governed by the legislation and rules and regulations set out by key governing agencies including the Government, The Football Association, EFL and the NSPCC Child Protection in Sport Unit.

Club Designated Safeguarding Officer

The Safeguarding Officer has responsibility to oversee and direct the safe provision of all activities and associated training relating to children and young people. This is a strategic role providing leadership and guidance on all safeguarding matters and relevant legislation, along with implementing safeguarding awareness and best practice across the Club, Academy and Community Programme.

The Safeguarding Officer will:

- Manage the implementation of the club and Community Programme strategy and action and implementation plan for safeguarding.
- Ensure SWFC compliance with statutory obligations under relevant legislation and the Affiliated Football Safeguarding Policy.
- Work closely with HR and heads of departments to develop and implement safer recruitment and induction practices across the organisations.
- Continuously work to maintain, embed and improve SWFC's safeguarding provision ensuring the highest standards for safeguarding vulnerable groups.
- Manage the development, implementation, promotion and review of the safeguarding vulnerable groups' policies, practices and good practice guidelines.
- Be the lead member of staff to manage safeguarding incidents, concerns, and allegations.
- Be the lead member of staff to work in partnership with statutory and football authorities, sharing information where appropriate to safeguard vulnerable groups.
- Maintain accurate, confidential, and up to date records on all safeguarding incidents, concerns, allegations and rationales for any decisions made.
- Give direction and guidance to staff in respect of safeguarding incidents, concerns and allegations.
- Support staff to respond appropriately to concerns about the welfare or safety of vulnerable groups.
- Lead and provide direction to safeguarding leads of departments.
- Ensure that safeguarding leads are trained, supported and supervised.
- Act as the lead source of safeguarding support, advice and expertise.
- Ensure staff understand their individual responsibilities to safeguard and promote the welfare of vulnerable groups.
- Develop relationships with statutory and football authorities.

- Attend regular safeguarding training and maintain an up-to-date knowledge base of relevant legislation, regulations and best practice.

Recording and Investigating of Allegations or Suspicion

The Designated Safeguarding Officer (DSO) will immediately report an allegation to the Designated Safeguarding Manager, who will ask for a written factual statement from the person making the report.

A Safeguarding Disclosure Form must be completed and submitted within 24 hours to the designated Safeguarding Officer and Designated Safeguarding Manager. Any statement made by the child should be reported in their own words.

These reports should be confined to facts. Any opinion, interpretation or judgement should be clearly stated as this, questions should be kept to a minimum, and where used, they should be of an open format (TED questions; 'tell me', 'explain', 'describe'). No suggestion of who the perpetrator was or how any concern or incident happened should be suggested. A child should never be pressured to give information or show physical marks unless they do so willingly. If they choose to show markings, two members of staff should be present and any marks raising concern should be recorded on the disclosure form.

There are actions which staff must, and are obliged to take, once they are aware of a problem. Undertakings of confidentiality should not be given either to the person making the allegations or to the person being interviewed. A matter is confidential on a need-to-know basis, and nobody should have any reservations about referring any issue to the Designated Safeguarding Manager or any Designated Safeguarding Officer.

The key issue is that the welfare of the child is protected. There is always tension and caution around issues of confidentiality. The advice for all staff is that no guarantee of confidentiality can be given to a child (although this does not necessarily mean that the parents/carers must be told). SWFC and SWFCCP will ensure that any child concerned is immediately removed from any risk of harm.

Investigations into abuse will require careful management. In these cases, the Designated Safeguarding Officer or Designated Safeguarding Manager will first seek the advice of the Safeguarding Children Team, Children's Services, a Local Authority Designated Officer (LADO), the police, or the Football Association Safeguarding Children Team, before setting up an internal inquiry and take their advice on informing the child's parents. In any case of suspected abuse, as soon as the Local Authority or the police have been informed, SWFC and/or must provide a report to the FA Head of Safeguarding Children. Any external local authority provision will naturally take the lead on any case.

If the allegation or suspicion is investigated internally by the Designated Safeguarding Officer or Designated Safeguarding Manager, SWFC will follow the 'Sport Resolutions Practical Guide to Undertaking Safeguarding Investigations in Sport' best practice guidance when recording allegations/suspicions and any subsequent investigations. Any investigation we undertake will follow the key principles as follows:

- Integrity – we will be honest with all parties involved regarding the process and what we can and cannot do.
- Fairness and Impartiality – we will speak to the complainant/s, witnesses and the individual/s to whom the concern relates to seek a balanced and unbiased account of events.

- Confidentiality – we will ensure that we follow confidentiality protocols and only share information with parties necessary for safeguarding reasons e.g. statutory authorities, (such as police or children's services) or local authorities (such as LADO)
- Proportionality – decision-making will be made on a case-by-case basis, taking into consideration several factors relevant to each case.
- Timeliness – whilst we recognise that investigations can be disruptive to the organisation, we will ensure that investigations are prioritised, but also thorough and methodical with a person centric approach and never rushed.

Providing it is appropriate to do so the Designated Safeguarding Manager will maintain constant dialogue with all parties involved with the allegation until such time as the matter has reached a reasonable outcome, taking the lead from the external agency.

Escalation to inform Board level will take place at the Designated Safeguarding Manager's earliest opportunity. Specific information regarding allegations against members of staff if the report involves an allegation about any member of staff (whether full time, part time, paid, unpaid, contracted, engaged, voluntary etc) and it is believed the report could demonstrate that the member of staff in question has:

- behaved in a way that has harmed a child or may have harmed a child.
- possibly committed a criminal offence against or related to a child or:
- behaved towards a child or children in a way that indicates he or she is unsuitable to work with children, then the Designated Safeguarding Manager or Designated Safeguarding Officer shall immediately inform the Local Authority Designated Officer (LADO) where the alleged incident took place so that he or she can consult with the police and Local Authority Children's Social Care colleagues as appropriate.

Where the Designated Safeguarding Manager or Safeguarding Officers are unsure as to whether the report meets the criteria stated above, the advice of the LADO shall still be sought. The member of staff in question may be asked to draft a brief report, as may any other person deemed to have an involvement in the allegation. The member of staff in question will be asked to stay away from activities pending the conclusion of any investigation. This process would only be carried out once the advice of the above-mentioned external bodies had been sought and only then in consultation with the Designated Safeguarding Manager or Designated Safeguarding Officer.

Providing it does not conflict with any advice received from LADO, any internal investigation will be carried out in line with SWFC Management and Human Resource Policies and either general or department-specific Grievance Procedures as they are applicable.

Non-Recent Concerns of Abuse

Referral of concern about non-recent/ historical abuse should also be made to the Safeguarding Manager or Designated Safeguarding Officer or alternatively, directly to the FA's Safeguarding Team via: safeguarding@thefa.com. A helpline is available 24 hours a day on 0800 023 2642.

The Concept of Significant Harm

Some children are in need because they are suffering, or likely to suffer, significant harm. There are no absolute criteria on which to rely when judging what constitutes significant harm.

The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interests of children and gives local authorities a duty to make enquiries to decide whether they should take action to safeguard or promote the welfare of a child who is suffering, or likely to suffer, significant harm.

A court may make a care order (committing the child to the care of the local authority) or supervision order (putting the child under the supervision of a social worker or a probation officer) in respect of a child if it is satisfied that:

- the child is suffering, or is likely to suffer, significant harm and:
- the harm, or likelihood of harm, is attributable to a lack of adequate parental care or control.

Consideration of the severity of ill-treatment may include the degree and the extent of physical harm, the duration and frequency of abuse, neglect and exploitation, the extent of premeditation, and the presence or degree of threat, coercion, sadism and bizarre or unusual elements. Each of these elements have been associated with more severe effects on the child, and/or greater difficulty in helping the child overcome the adverse impact of the maltreatment. Sometimes a single traumatic event may constitute significant harm, for example, a violent assault, suffocation, or poisoning.

More often, significant harm is a compilation of noteworthy events, both acute and long-standing, which interrupt, change, or damage the child's physical and psychological development. Some children live in family and social circumstances where their health and development are neglected. For them, it is the corrosiveness of long-term emotional, physical or sexual abuse that causes impairment to the extent of constituting significant harm. In each case, it is necessary to consider any maltreatment alongside the child's own assessment of his or her safety and welfare, the family's strengths and supports, as well as an assessment of the likelihood and capacity for change and improvements in parenting and the care of children and young people.

Types of Abuse

Definitions of types of abuse are provided below. Abuse can also entail children, young people and vulnerable adults witnessing any of these forms described. Should you have any concern that abuse is occurring you should contact the Senior Safeguarding Manager or Designated Safeguarding Officer immediately.

Physical abuse: Any deliberate act causing injury or trauma to another person, for example, hitting, slapping, pushing, kicking, burning, giving a person medicine that they do not need and/or that may harm them or application of inappropriate restraint measures.

Emotional abuse: Any act or other treatment which may cause emotional damage and undermine a person's sense of wellbeing, including persistent criticism, denigration or putting unrealistic expectations on Children, Young People and Adults at Risk, isolation, verbal assault, humiliation, blaming, controlling, intimidation or use of threats.

Sexual abuse: Any act which results in the exploitation of Children, Young People and Adults at Risk, whether with their consent or not, for the purpose of sexual or erotic gratification. This includes non-contact activities, such as indecent exposure, involving Children, Young People and Adults at Risk in

witnessing sexual acts, looking at sexual images/pornography or grooming them in preparation for abuse (including via the internet).

Whilst the age of consent (the age at which a person is legally competent to consent to sexual acts) is 16, it is unacceptable for any member of staff to abuse their relationship of trust for sexual gratification.

Positions of trust
'Position of trust' is a legal term defined in the Sexual Offences Act 2003 that refers to certain roles and settings where an adult has regular and direct contact with children. Recent changes to the Act include an extension of the positions of trust offences where an adult is coaching, teaching, training, supervising or instructing a 16 or 17-year-old child in a sport on a regular basis. It is therefore against the law for someone in a position of trust to engage in sexual activity with a child in their care, even if that child is over the age of consent (16 or over).

Child sexual exploitation: A form of child sexual abuse. It occurs where an individual or groups of people take advantage of an imbalance of power to coerce, manipulate or deceive a child or young person into sexual activity in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation can also take place using technology.

Child criminal exploitation: Can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others.

County lines: The organised criminal distribution of drugs by gangs from the big cities into smaller towns and rural areas using Children, Young People and Adults at Risk. Gangs recruit Children, Young People and Adults at Risk through deception, intimidation, violence, debt, bondage and/or grooming. Gangs also use local property as a base for their activities, and this often involves taking over the home of an Adult at Risk who is unable to challenge them. County line gangs pose a significant threat to Children, Young People and Adults at Risk upon whom they rely on to conduct and/or facilitate such criminality.

Cuckooing: Cuckooing is a term often linked to county lines. Cuckooing is when gangs establish a base in the location they are targeting for drug dealing and to operate their criminal activity from, often taking over the homes of Adults at Risk by force or coercion. People exploited in this way will quite often be exposed to physical, mental and sexual abuse, and in some instances will be trafficked to areas a long way from home as part of the network's drug dealing business. Victims of 'cuckooing' are often drug users but can include older people, those suffering from mental or physical health problems, female sex workers, single mothers and those living in poverty. Victims may suffer from other forms of addiction, such as alcoholism.

Neglect: Ongoing failure to meet the basic needs of Children, Young People and Adults at Risk. Neglect may involve failing to provide adequate food or shelter including exclusion from home or abandonment, failing to protect them from physical and emotional harm or danger or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, basic emotional needs. In an activity setting, it may involve failing to ensure that Children, Young People and Adults at Risk are safe and adequately supervised or exposing them to unnecessary risks.

Grooming: The process of developing a relationship with and the trust of an individual, and sometimes their family, to exploit, abuse or traffic them. Grooming can happen both online and in person. Radicalisation: The process by which a person comes to support terrorism and forms of extremism leading to terrorism. Anybody from any background can become radicalised. The grooming of Children, Young People and Adults at Risk for the purposes of involvement in extremist activity is a serious safeguarding issue.

Female Genital Mutilation ('FGM'): Involves procedures that intentionally alter or injure female genital organs for non-medical reasons. The procedure has no health benefits for girls and women. The Female Genital Mutilation Act makes it illegal to practise FGM in the UK or to take women and girls who are British nationals or permanent residents of the UK abroad for FGM whether it is lawful in another country. Forced Marriage: Where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. This is recognised in the UK as a form of domestic and/or sexual violence against women and men and is a serious abuse of human rights. Where it affects children and young people it is child abuse.

Honour Based Abuse (HBA), or Violence (HBV) can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code. It is a violation of human rights and may be a form of domestic and/or sexual violence. Where it affects children and young people it is child abuse. It can be distinguished from other forms of abuse and violence, as it is often committed with some degree of approval and/or collusion from family and/or community members. Women, men and younger members of the family can all be involved in the abuse.

Victims of honour-based abuse are more likely to be abused multiple times by multiple perpetrators. Honour-based abuse and violence manifests itself in a diverse range of ways with children and young people, it can lead to a deeply embedded form of coercive control, built on expectations about behaviour that are made clear at a youthful age. Honour-based abuse can also include forced marriage, domestic and/or sexual violence, rape, physical assaults, harassment, kidnap, threats of violence (including murder), witnessing violence directed towards a sibling or indeed another family member and female genital mutilation. All staff working with suspected or actual victims of forced marriage and honour-based violence need to be aware of the 'one chance' rule. That is, they may only have one opportunity to speak to a victim or potential victim and may only have one chance to save a life. If the victim is allowed to leave without the appropriate support and advice being offered, that one chance might be wasted.

Bullying: Repeated behaviour intended to intimidate or upset someone and/or make them feel uncomfortable or unsafe, for example, name-calling, exclusion or isolation, spreading rumours,

embarrassing someone in public or in front of their peers, threatening to cause harm, physically hurting someone or damaging their possessions.

Cyberbullying: The use of technology to harass, threaten, embarrass, humiliate, spread rumours or target another person. It occurs among children and young people. When an adult is the victim, it may meet the definition of cyber harassment or cyberstalking.

Discriminatory abuse: Abusive or bullying behaviour because of discrimination occurs when motivated by a prejudice against certain people or groups of people. This may be because of an individual's ethnic origin, colour, nationality, race, religion or belief, gender, gender reassignment, sexual orientation or disability. Actions may include unfair or less favourable treatment, culturally insensitive comments, insults and 'banter.' Discriminatory behaviour is unacceptable and will be reported to The FA. This includes incidents on and off the pitch (including social media).

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

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

Child-on-child abuse: Any form of physical, sexual, emotional, financial and coercive control exercised between children, and within children's relationships (both intimate and non-intimate), friendships, and wider peer associations. Child-on-child abuse can take various forms, including (but not limited to): serious bullying (including cyberbullying), relationship abuse, domestic violence and abuse, child sexual exploitation, youth and serious youth violence, harmful sexual behaviour and/or prejudice-based violence including, but not limited to, gender-based violence. Online child-on-child abuse is any form of child-on-child abuse with a digital element, for example, sexting, online abuse, coercion and exploitation, child-on-child grooming, threatening language delivered via online means, the distribution of sexualised content, and harassment.

Domestic violence or abuse: Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over, who are or have been intimate with partners or family members regardless of gender or sexuality. This can encompass, but is not limited to psychological, physical, sexual, financial, emotional abuse and so called 'honour-based' violence.

Concerns around radicalisation and extremism: The Counter Terrorism and Security act places a duty on specified authorities, including sport in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism (the prevent duty). There is also a duty on

local authorities to ensure there is a Channel Panel in place. This must include the local authority and senior police officers. The panel will assess to what extent identified individuals are vulnerable to being drawn into terrorism. The Act requires partners of the Chanel Panel to cooperate with the panel in the carrying out of its functions and the police in Page 11 of 15 undertaking the initial assessment as to whether a referral is appropriate. Any concerns or queries regarding this should be discussed with the designated lead for PREVENT.

The PREVENT strategy: Responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face 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. It works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation that we need to deal with. The strategy covers all forms of terrorism, including far right extremism and some aspects of non-violent extremism. For further information please see *Prevent Policy.*

The Counter Terrorism & Security Act (2015): This Act places a duty on specified authorities including schools, further and Higher Education, to have due regard to the need to prevent people from being drawn into terrorism (the PREVENT duty). At SWFC AND SWFCCP, we are committed to supporting vulnerable people through our safeguarding policies and procedures and recognise that this will support our contribution to the PREVENT duty. We build people's resilience to radicalisation by promoting fundamental British values and enabling our pupils to challenge extremist views.

Online Safety

While the internet and online platforms offer many benefits and positive opportunities, it is important to be aware of the potential risks faced by Children and Adults at Risk which include, but are not limited to:

• 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 online bullying.

• Commerce: Financial risks such as online gambling, inappropriate advertising, phishing and or financial scams.

To safeguard children who make use of online information technology (such as mobile phones/devices, games consoles and the Internet) as part of their involvement with the club, staff are expected to:

• Ensure that the same professional standards of offline practice and behaviour are applied online. This includes dressing appropriately for online activities/meetings.

• Be in a neutral area where nothing personal or inappropriate can be seen or heard in the background when delivering online activities.

• Consider what is visible on devices, for example: files on desktops, social media accounts, personal information or emails if sharing their screen.

• Familiarise themselves with online platform privacy settings and how to report concerns.

• Never share or request any personal information.
• Not follow, accept/add or invite children to be 'friends' within social networking sites such as 'X' (formerly Twitter), Facebook, Instagram, Snapchat etc.
• Avoid 'one to one' electronic communication. Where you do communicate electronically ensure you send this communication to the parent or person responsible as well as the child.

Further information and guidance are detailed in the *ICT & Social Media Policy* and *Online Safety Policy.*

Low-Level Concerns

A low-level concern is any concern that an individual has acted in way that:
• is inconsistent with our values and/or which breaches of our codes of conduct, policies and procedures; and/or
• causes concern (no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt') about their suitability to work with children and/or adults at risk. The term 'low-level concern' does not mean the issue is insignificant, it means that the concerning behaviour does not meet the harm threshold requiring referral to statutory agencies.

Environments that ignore or facilitate this behaviour risks creating an environment for children and adults at risk to be abused or harmed. While some behaviour may be inadvertent or thoughtless, a misunderstanding or lack of awareness, it could be deliberate and intended to enable abuse at a later stage.

Safeguarding training will contain clear procedures for confidentially sharing these concerns and how to seek assistance from the safeguarding officer on whether an incident is a low-level concern or meets the harm threshold.

Safeguarding Training

SWFC will ensure there are qualified and designated individuals within the organisations that take the lead on ensuring that we do all we can to meet our statutory and moral obligations. A Safeguarding induction is provided for all new starters, including full time, part time and casual members of staff. This induction is provided by the DSO. More specific training is given to people based on their job role and the need of the person.

All staff working in direct contact with children are required to complete The FA's Safeguarding Children Awareness Workshop and undertake a refresher course at least once every three years. Details of satisfactory completion are held on the SCR which can be accessed by the club DSO and the HR team. Bi-annual training is provided to all staff as part of their own CPD and monthly updates are provided to all staff through the Staff Newsletter. Following the release of new legislation that will have an impact on any work being carried out by the Club and Community Programme, the DSO will ensure that all personnel are made aware of this and that it is incorporated into ways of working.

Recruitment

SWFC have a specific safer recruitment policy which sets out in detail the process undertaken in ensuring staff are suitable to work with Children and Adults at Risk. A copy is available if required. All staff will undertake a specific safeguarding and safer working practices induction upon employment. A briefing document and guidance for safer working practices will be provided and will also be available on the

network. Key elements of SWFC's Safeguarding Children Policy are discussed in more detail if the role requires it.

In addition, as part of the shortlisting process, SWFC may consider carrying out an online search for publicly available information as part of its due diligence and pre-recruitment checks.

Disclosure and Barring Service Criminal Record (DBS) Checks

DBS checks will be carried out for all relevant postholders. New staff will not be allowed unsupervised access to children and young people until a satisfactory DBS check has been received. The Club Designated Safeguarding Officer and HR department are responsible for ensuring all checks are carried out in the required timescales. SWFC process DBS checks via The FA Online Application System for posts governed by FA Regulations. All other posts outside this scope will have DBS checks processed by SWFC directly with First Advantage Online Disclosures. Should a check highlight a criminal record on the individual that would deem them unsuitable to work with children and young people, the following will apply:

For checks completed via the First Advantage Online Disclosures, the Designated Safeguarding Officer will confidentially liaise directly with the applicant. In the event that a DBS check highlights a criminal record on the individual that would not deem them necessarily unsuitable to work with children and young people, this will be referred to HR for a risk assessment and final decision, and any subsequent job offer will be subject to consideration of the Rehabilitation of Offenders Act 1974; to the nature, seriousness and relevance of the offence; the time passed since the offence occurred and the age of the individual when the offence occurred; and whether it is an isolated offence or numerous offences; or decriminalisation. If the applicant disputes any information contained in the disclosure and has contacted the DBS about the dispute, SWFC may defer the decision regarding the appointment until the applicant has had reasonable opportunity to have the dispute considered by the DBS, but this deferral is at the absolute discretion of SWFC and SWFC Community Programme.

We will accept portability of DBS certificates if individuals have joined the DBS Update Service, but only for posts not governed by the FA Regulations. Posts governed by The FA Regulations will require an in-date FA DBS certificate. Postholders previously employed in an FA regulated post will have their FA records checked on The FA Whole Game system before a new application is processed. It is compulsory that postholders agree to a 're-check' of DBS status at a time specified by The FA and the relevant league in place at such time. Such timeframes may change from time to time. It is compulsory that postholders also agree to inform SWFC of any cautions or convictions that they have received mid-cycle. It is also compulsory that postholders confirm there are no changes to the DBS status prior to the start of each season.

Recruitment and Selection Procedure

Planning and Advertising

Before a position can be advertised, the post must be authorised, and a Job Description which defines the duties, skills, qualifications and experience required of the role. It will also clearly state whether a Disclosure and Barring Service (DBS) Criminal Record Check will be required.

All posts will be advertised and managed by the HR Department. Depending on the post, this may be limited to internal advertising only. Whether the post is advertised internally and/or externally, the advert will always make clear SWFC are commitment to safeguarding and welfare of children and young people. Application process candidates will apply via completion of an SWFC Application Form

as a minimum requirement (CVs will be accepted as additional supporting information to the Application Form but will not be relied upon for decision making).

The Application Form includes the applicant's declaration regarding convictions, working with children and the provisions of the Rehabilitation of Offenders Act 1974. Applicants that fail to complete the declaration will not be shortlisted.

Shortlisting and Interview Stages:
The recruiting manager will shortlist the candidates by reviewing the Application Form (and any supporting documentation) against the Job Description.

Training and Awareness for Employees, Third Parties and Contractors

All Staff who commence employment with SWFC are sent key policies, to include the Employee handbook, Safeguarding policies and the Safeguarding Guide to Safer Working Practice.

The DSO, Line Manager or HR will hold a specific Safeguarding & Safer Working Practice Induction with all new fixed-term, permanent starters, and volunteers during which the key elements of SWFC Safeguarding Children Policy are discussed in more detail and specifically to the individual's role.

All staff working in direct contact with children are required to complete The FA's Safeguarding Children Awareness workshop and undertake a refresher course, as advised by The FA, at least once every three years. Safeguarding Awareness refresher courses are held by SWFC to develop knowledge which are department specific.

All external contractors engaged by SWFC undergo a suitability test prior to commencing work. This will include evidencing the contractor's Safety Record, Health & Safety Policy, Liability Insurance, Risk Assessment/Method Statement and details of Competent Person. On arrival at the Club the contractor will receive a site induction from a member of the Facilities Team which covers Safeguarding Children and give details of our expected code of behaviour. Contractors are subject to regular inspection from SWFC personnel. In the event of a contractor carrying out work on an area that is usually occupied by children, this work where possible will be undertaken when children are not present.

Work Experience

SWFC may from time to time offer work experience placements to young people.
Whilst undertaking work, those on work experience will not have unsupervised access to children.
For those undertaking work experience who are under the age of 18, more detailed guidelines can be found in the policy regarding the employment/engagement of workers under the age of 18.

Ratios and the Supervision

Any activity undertaken by SWFC will always be given 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 disability needs. The lower the age of the participants, the greater the need for supervision.

Regardless of these ratios a minimum of two members of staff or delivery partner will always be available to supervise an activity. This ensures at least basic cover in the event of something

impacting on the availability of one of the adults during the activity (e.g. in the event of a participant requiring the attention of an adult during the activity following an accident).

- For children under 5 the recommended ratio should be no more than 1:6.
- For children under 8 the recommended ratio should be no more than 1:8.
- For children over 8 the recommend ratio should be no more than 1:10, but this varies depending on the activity, advice should be sought from the Safeguarding Manager or Officer if unsure.
- For academy activities, the Premier League's Youth Development Rules prescribe a ratio of 1 Coach to 8 Players (over 8s).
- For organised groups of children attending a matchday at Hillsborough Stadium, the minimum ratio is two responsible adults to 20 children; where SWFC are taking responsibility for the care of the children, parents/carers should not be included in supervision calculations.

Lone Working Guidance

Lone working with children should only occur in exceptional circumstances, and if it does, the staff member must seek and follow the specific guidance from the Designated Safeguarding Officer.
The Club only permits scouts from other Clubs to attend its Academy Games Programme matches in accordance with the provisions of the Premier League Youth Development Rules.

Gifts and Favouritism

Staff should take care that they do not accept any gift that might be construed as a bribe by others or lead the giver to expect preferential treatment. All staff are expected to adhere to SWFC Anti-Corruption and Bribery policies which can be found in the Employee Handbook. It is recognised that there are occasions when children or parents wish to pass small tokens of appreciation to staff, for example at Christmas or as a 'thank you' and this is acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value as this may be misinterpreted by others. Staff should report any gifts received to their line manager and they should be dealt with appropriately.

Similarly, it is not permitted for staff to give personal gifts to children. This could be misinterpreted as a gesture either to bribe, or to single out the child. It might also be perceived that a 'favour' of some kind is expected in return. Any reward given to a child must first be agreed with the staff member's line manager as part of a structured reward system in line with the departmental policy and not based on favouritism.

Infatuations

Children, Young People and Adults at Risk may develop an infatuation with a member of staff who works with them. Such situations should be handled sensitively to maintain the dignity and safety of all concerned. Staff should be aware that in such circumstances, there is a high risk that words or actions may be misinterpreted and that allegations could be made against staff. They should therefore ensure that their own behaviour is above reproach. A member of staff who becomes aware that a Child, Young Person or Adult at Risk may be infatuated with him/her or with a colleague, should discuss this at the earliest opportunity with the Safeguarding Team.

Image Use

SWFC takes guidance on the use of images from guidelines issued by The FA, EFL and Sheffield Safeguarding partnership. All images are taken by club officials or approved third parties who have been briefed by the member of staff (and where possible a Safeguarding Officer) responsible for the activity being photographed/filmed as follows:

- Before taking images of children, parental consent is sought in writing at the start of each football season, education year or prior to the event: Parents/Legal Guardians are responsible for informing.
- SWFC should be informed of any change of circumstances within the season which may affect consent.
- Parents/Legal Guardians will be informed of how the image will be used and SWFC will not allow an image to be used for something other than that for which it was initially agreed.
- All children featured in SWFC 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.
- Designated Club photographers will, where applicable, undertake a DBS check and attend a Safeguarding Children workshop and in any case will be personally responsible for keeping up to date with the latest guidelines on the Use of Images policies issued by SWFC, Safeguarding Partnership and by the EFL.
- Photographers must always wear identification.
- Images must not be taken, stored, or shared on personal devices, e.g. mobile phones, tablets, etc.
- Children who are subject to family, care, or legal proceedings, or who are under a court order will not have their images published in any SWFC or SWFCCP document.
- No images of children featured in SWFC or SWFCCP publications will be accompanied by personal details such as their school or home address.
- Recordings of children for the purposes of legitimate coaching aids are only filmed by Club and Community officials and are stored safely and securely at SWFC premises.
- Any instances of inappropriate images in SWFC should be reported to the Club's Director of Communications and the Designated Safeguarding Officer immediately.
- SWFC do not publicise young player profiles under the age of 17 with images and personal information on their website.

Matchday

In accordance with the Club's ticketing terms and conditions, the minimum age that a child is permitted to attend a match at the Club unaccompanied is 14 years old. All persons under this age will be required to attend and sit within close proximity (determined at the absolute discretion of the Club) to an adult (aged 18 and over).

If an accompanied child who is under 14 years or adult at risk is lost/found alone or left unattended on a matchday, it is the club's responsibility to protect the young person's welfare and safety. Where stewards have found a lost child, they will alert central control immediately who will then deploy the Designated Safeguarding Officer. The young person will be supervised by two staff members at a safe

collection point and if parents/adults accompanying the child cannot be contacted or located after 30 minutes/end of the match the police will be informed.

If the circumstances of the child being lost and/or missing raise a potential safeguarding concern the Designated Safeguarding Officer may escalate their concerns to either the police or where necessary Social Services.
This may include:
• If the parent/carer is intoxicated and unfit to care and/or escort the child safely from the stadium.
• the child has been lost due to the actions of the parent/carer.
• If a child is lost, under 14 and has no contact details for parents.
• If a child is lost and in need of urgent medical attention.

In the event that matchday staff identify that the ejection of a child is necessary they will be escorted from the stadium but will remain on the premises. A male and female steward will supervise them until the end of the match along with the Designated Safeguarding Officer completing a check on their welfare. Drinking water will also be provided.

Late Collection of a Child

It is the parent or responsible adult's responsibility to ensure that their child is dropped off and collected by the responsible person unless permission has been given through written consent for the child to travel home unsupervised.
• Unless written permission has been given for the child to walk home alone or to be picked up by another individual, staff should not discharge the child from their responsibility.
• Whether a child has participated in an activity or is arriving back from a trip or tour, when collected, parent or person responsible must use the agreed designated collection point.
• Staff have a responsibility to ensure that they have signed all children out appropriately.
• Only children who have been given prior written permission to walk home alone may do so. These individuals must still sign out on the register and any child being collected by their parent or person responsible who does not have permission to walk home alone must be signed out by the parent or person responsible before they leave.
• All parents or the person responsible are made aware that their children should be met no later than 15 minutes after an activity has finished.
• Should a child not be collected within 15 minutes, staff have emergency contact numbers and should communicate with their line manager to seek alternative numbers if necessary.
• For those staff working within an educational environment an emergency contact number for the site manager or designated person should be made available.
• In the event that a child is not collected on time, a minimum of two staff and/or responsible adult will wait at the venue until the parent/person responsible arrives. A child should not be left alone with a member of staff unless it is unavoidable and in this instance a line manager or Head of Department should be notified immediately.

Mascots & Ball Assistants

The Club will only allow children to be matchday mascots or ball assistants once parental consent has been obtained. A signed consent form is also completed for images to be published in the Club's publications. No photographs of mascots or ball persons featured in club publications will be accompanied by personal information about the child, such as their school, home address or local sports team. Whilst at Hillsborough Stadium, mascots and ball persons are always accompanied by at

least two members of staff who have a valid DBS Check. Staff who are responsible for mascots and ball persons on a matchday are also required to have a satisfactory level of understanding and awareness of safeguarding children.

Ball assistants will also receive training on their induction which will explain their role and responsibilities along with education on safeguarding procedures which protect them and others around them on matchdays.

Communicating with Children

The SWFC Academy and SWFCCP Education and Participation Department are committed to the welfare and safety of all children within the Academy and Community Programme and the Club as a whole. These departments also realise the importance of communication and work closely with parents, carers, host families, schools and local authorities to ensure the wellbeing of all children is paramount.

In the interests of ensuring professional boundaries are maintained employees must not communicate via personal devices, become friends with or add to their social media network with any potential, current or former young people (under the age of 18) or parents unless a clear reason exists, for example, they are a relative or family friend. Entering such a relationship may lead to abuse of an employee's position of trust and breach the standards of professional behaviour and conduct expected by SWFC.

When using SWFC devices to communicate:

- Make sure communications are only in relation to specific SWFC-related activities. e.g. informing about changes in travel arrangements, timings or signposting.
- Never use company devices to communicate for personal conversation, sending pictures, jokes or other items of a personal nature.
- Never share any personal information with others, e.g. contact information.
- Never engage in one-to-one messaging, always include parent or person responsible and/or appropriate member of staff.
- Report to the Safeguarding Officer any instance(s) where you have received any inappropriate communications from a child, parent or person responsible and do not delete any data.

Transport

SWFC has a Player Care Administrator who is responsible for overseeing transport arrangements across the academy, including registered academy players and players attending the Club on trial. The Player Care Administrator attends weekly meetings with the Designated Safeguarding Officer to report on the academy's transport programme and other relevant matters.

When children are being transported on behalf of SWFC they shall, where possible, be accompanied by their Team Manager, Tutor, a Coach or a designated Tour Leader.

In some cases, where children need to be transported unaccompanied, this will be with an approved travel company (who have signed up to relevant Club Policies), or by a member of SWFC staff who has a satisfactory DBS check and has been issued with (and received training on) the Transport Policy. In either case a child will only be transported under these circumstances with the specific prior consent of their parent or guardian. Although outside of the sphere of responsibility for local

education authorities, the club also provides a duty of care for young persons when travelling on behalf of SWFC. Children shall be always accompanied by an Activity Leader. Only vehicles and drivers approved under the SWFC Transport Policy will be used to transport children.

Under no circumstances will a member of staff use a private vehicle to convey children engaged in an Activity being delivered by SWFC.

Medical

There will be occasions where medical treatment is necessary during training sessions and weekend fixtures and unfortunately, due to staffing numbers, SWFC are unable to guarantee that two members of staff are present during treatment sessions.

All members of the medical department have a valid DBS check and are required to attend The FA's Safeguarding Children Awareness workshop and internal Safer Working Practice training. SWFC are fully committed to equal opportunities for all individuals and, as such, employ both male and female staff to work within the medical department.

SWFC are more than happy for parents and carers to attend pre-booked medical treatments if required. If, due to the first team's schedule, this is not possible an alternative appointment may need to be arranged.

If a safeguarding disclosure is made to a member of the Medical Department, the staff member will always report such disclosure to the Designated Safeguarding Officer.

There may be occasions where medical treatment is necessary during an activity or event run by Sheffield Wednesday. They will ensure a level of medical cover is available at all its activities including at least one suitably trained Emergency First Aider. All relevant and necessary medical information of participants will be treated in confidence but provided to the Event Lead, if necessary, e.g. asthmatic participants. Specialist medical advice and further information will be sought when working with children who have additional needs or disability.

Academy Host Families

Prior to the commencement of an agreement between the academy and a host family an Enhanced DBS plus barred list check is carried out on the designated house parent along with an enhanced check on any other person residing at the house who is over 16 years of age.

At present the academy does not have any accommodation arrangements that fall within the regulations of Private Fostering, however if a such a situation did occur then the club would ensure that suitable dialogue takes place with the relevant Local Authority to ensure that all statutory requirements are met.

References from previous employers and local authorities (where applicable) are also sought. House visits and full Health & Safety risk assessments are also conducted by academy staff and the Designated Safeguarding Officer and a guidance manual is issued.

Youth Loans, Trials and 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, SWFC will insist that, where possible, players are placed in host family accommodation during their time away from the club and not in hotel accommodation, and as good practice the club should designate a member of academy staff who will be nominated by the Designated Safeguarding Officer, to check on the player/s on a regular (weekly) basis, not just for game situations but for their general welfare whilst on loan, trial or work experience.

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 suitable checks, e.g. medical forms. Where accommodation is required during the trial period, this will be in designated host family accommodation or, if the player's parent/guardian is also travelling with the player then a local hotel may be used as an alternative. Transportation will be arranged during the trial period via the academy and agreed with parents/guardians.

Under 18, Under 21 and First Team Progression

As players progress through the academy system, they may have the opportunity to train and play with the adult provisions of the club. This may raise concerns for the individual and/or their parent/guardians as they will be entering an adult provision and as such may witness adult behaviours and language. The club will support the player/s during this transition and ensure that their welfare is paramount. Parents will be included and consent sought.

This policy should be read in conjunction with the following policies:

- Whistleblowing Policy
- Anti-Bullying Policy
- Safer Recruitment Policy
- Safeguarding Guide to Safer Working practices
- IT and social Media Policy
- Equality Policy
- Complaints Policy
- Prevent Policy
- Online Safety Policy
- FGM Policy
- Safeguarding Adults at Risk Policy
- Health and Safety Policy
- Trips, Tours, and Tournaments Policy
- GDPR Policy

Emergency Contact Details

- Sheffield Children's Services - 0114 203 9591
- Sheffield Children Safeguarding Partnership - www.safeguardingsheffieldchildren.org
- Sheffield Safeguarding Hub - 0114 273 4855
- LADO - LADO@sheffield.gov.uk
- FA case management team - Duty Manager 0800 083 5902
- FA County welfare Officer Sarah Pridmore - Sarah.Pridmore@sheffieldfa.com
- DSO for EFL Trust - Tara Lawson 07964905652
- PFA - Telephone: 07500 000 777 or visit: thepfa.com/wellbeing

Other safeguarding contacts in football: Whilst any safeguarding concern should be raised with the Club Safeguarding contacts in the first instance, we recognise that this may not always be possible or appropriate.

KEY WIDER SAFEGUARDING /HELPLINE CONTACTS

- help@nspcc.org.uk/ childline.org.uk or telephone 0808 800 5000
- Sheffield Children Safeguarding Partnership Adult Safeguarding Partnership: safeguardingsheffieldchildren.org
- British Transport Police (non- emergency): www.btp.police.uk or police.uk/contact/101 101 0800 405040
- NSPCC helpline – helping adults protect children 24 hours a day. For help and support and advice regarding any concerns about children that you think may be at risk of harm: help@nspcc.org.uk. Text 88858 or Telephone 0808 800 5000
- UK Safer Internet Centre professional advice line – helpline for professionals working with children and young people in the UK with any online safety issues they may face themselves or with children in their care: helpline@safeerinternet.org.uk or telephone 0844 381 4772
- Police Anti-Terrorist Hot Line: 0800 789 321
- National Domestic Abuse Helpline: free and in confidence, 24 hours a day: 0808 2000 247
- Young Minds: youngminds.org.uk
- Disrespect Nobody: disrespectnobody.co.uk
- Mind: 0300 123 3393 mind.org.uk
- Rethink 0808 801 0440. Calls are free from a landline or mobile.
- The Samaritans: 116 123 samaritans.org
- ChildLine: 0800 1111 or visit: childline.org.uk NSPCC: 0808 800 5000 or visit: nspcc.org.uk
- External Resources FA Safeguarding Children Guidelines: thefa.com/footballrules-governance/safeguarding/section-11thecompletedownloadsdirectory
- Working Together to Safeguard Children 2018: gov.uk/government/publications/working-together-to-safeguard-children Information Sharing Guidance for Managers and Practitioners:
- Department for Education (2023) Working together to safeguard children: a guide to multi-agency working to help, protect and promote the welfare of children. Working together to safeguard children.
- Department for Education (2023) Stable homes: built on love: strategy and consultation. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment

Legislative Polices

Health & Safety at Work Act 1974
Data Protection Act 2018
Safeguarding Vulnerable Groups Act 2006
Equality Act 2010
Domestic Abuse Act 2021
Sexual Offences Act 2003
Keeping Children Safe in Education Children Act 1989
Children Act 2004
Education Act 2002
https://www.gov.uk/government/publications/protectingchildrenfromradicalisationthe-prevent-duty
Police Act 1997
Protection of Freedoms Act 2012
Counter Terrorism and Security Act 2015
Counter Terrorism and Security Act 2015 - Part 5
Department for Education: Child sexual exploitation Home Office: Criminal Exploitation of children and vulnerable adults Female Genital Mutilation Act 2003
Home Office: Mandatory Reporting of FGM The Right to Choose: Statutory guidance for dealing with forced marriage.
Department for Education: Preventing and tackling bullying Department for Education: Cyberbullying Sexting in schools and colleges: responding to incidents and safeguarding young people Indecent images of children: guidance for young people.
https://thecpsu.org.uk/helpadvice/topics/saferrecruitment
http://www.nspcc.org.uk/preventingabuse/child-abuse-andneglect
http://www.nhs.uk/conditions/social-careand-support guide/pages/vulnerablepeopleabusesafeguarding.aspx
http://www.forwarduk.org.uk/
https://www.ceop.police.uk/ http://www.karmanirvana.org.uk/

CLUB KEY CONTACTS

Samuel Tye
Designated Safeguarding Officer.
Sam.tye@swfc.co.uk or Telephone: 07801 231726

Lindsey Hinton
Club Secretary and Senior Safeguarding Manager
Lindsey.hinton@swfc.co.uk or Telephone: 0114 3240760

Louise Carpenter
Human Resource Manager (HR)
Louise.carpenter@swfc.co.uk or Telephone: 0114 3240705

Richard Stanford
Operations Manager (Single Point of Contact for PREVENT)
Richard.stanford@swfc.co.uk or Telephone: 07795 632738

ACADEMY KEY CONTACTS

Dan Potts
Academy Head of Education and Welfare and Mental Health First Aider.
Dan.potts@swfc.co.uk or Telephone: 07891 676242

Rachel Finney
Academy Player Care
Rachel.finney@sefc.co.uk or Telephone: 07722 289572

SWFC COMMUNITY PROGRAMME (SWFCCP) KEY CONTACTS

Marcus Brameld
Head Of Community
Marcus.brameld@swfc.co.uk or Telephone: 07977 409807

Ben Winter
Deputy Head Of Community
Ben.Winter@swfc.co.uk or Telephone: 07495 163894

Rachel Stewart
Education and Employability Manager
Rachel.stewart@swfc.co.uk or Telephone: 07753 295118

Kim Maybury
Pastoral & Deputy Education Safeguarding Officer
Kim.maybury@swfc.co.uk or Telephone: 03700 20 1867

Paul Hebda
Youth and Integration Manager
Paul.Hebda@swfc.co.uk or Telephone: 07805 603888

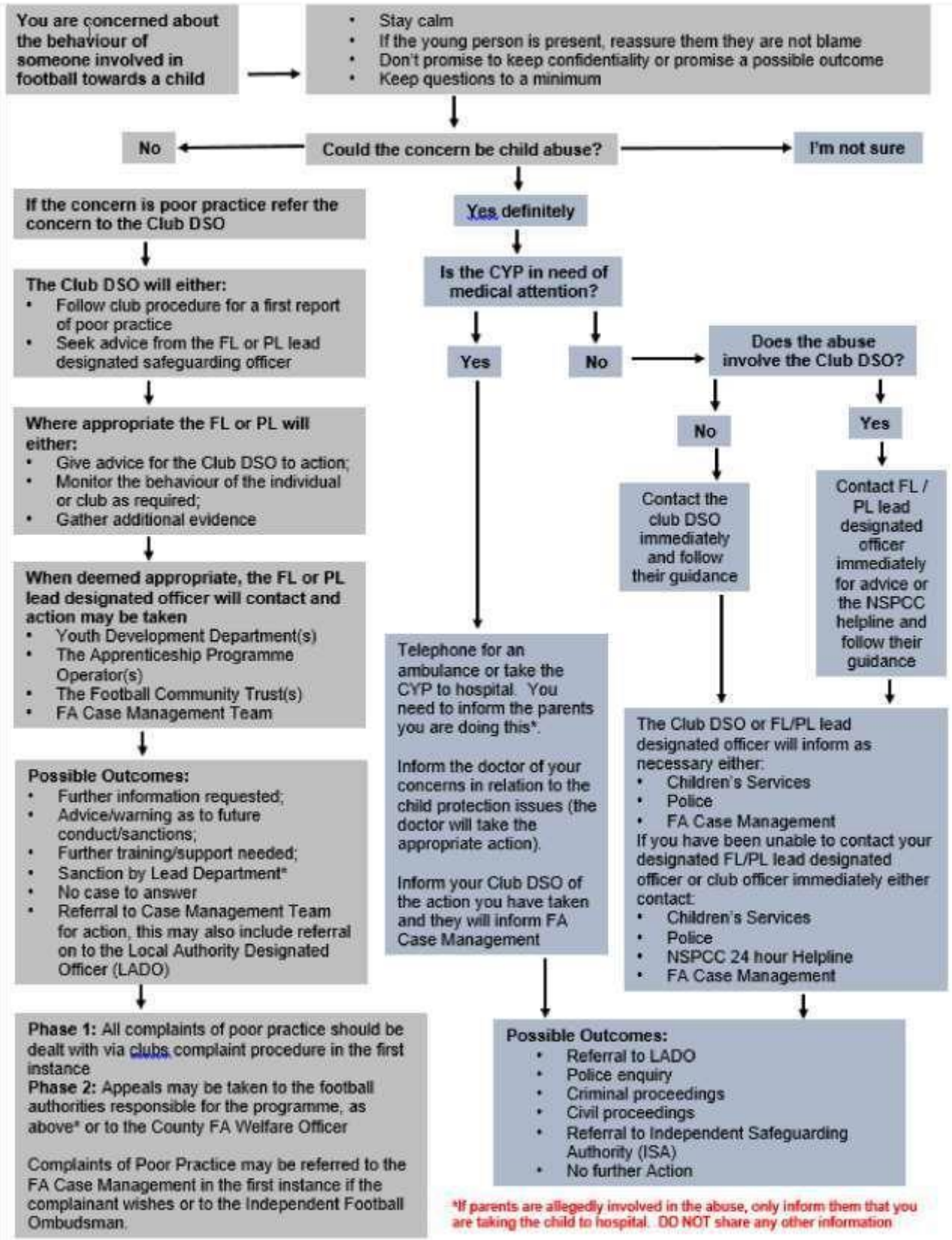
Sean Graves
Health Manager
sean.graves@swfc.co.uk or Telephone: 07852 191260

Brett Pitcher
Participation Manager
Breyy.pritcher@swfc.co.uk or Telephone 07562378492

SAFEGUARDING INCIDENT FORM

☐ **Accident**	☐ **Incident**	☐ **Safeguarding Concern**
☐ **Club**	☐ **Academy**	☐ **Community**
Date of incident:		
Name and details of the person(s) the report is being made about:		
Account of incident or concern: (give clear details relating to what happened, where, when, who was involved, what was said, nature of injury or behaviour, any witnesses etc, keep if factual).		
Action taken:		
Name of person making the report:		
Signed:		
Date:		
ADMIN USE ONLY		
Designated Safeguarding Officer:		
Signed:		
Date:		
Further action taken:		

FLOW CHART


You are concerned about the behaviour of someone involved in football towards a child
Stay calm
If the young person is present, reassure them they are not blame
Don't promise to keep confidentiality or promise a possible outcome
Keep questions to a minimum
Could the concern be child abuse?
No
I'm not sure
Yes definitely
If the concern is poor practice refer the concern to the Club DSO
The Club DSO will either:
Follow club procedure for a first report of poor practice
Seek advice from the FL or PL lead designated safeguarding officer
Where appropriate the FL or PL will either:
Give advice for the Club DSO to action;
Monitor the behaviour of the individual or club as required;
Gather additional evidence
When deemed appropriate, the FL or PL lead designated officer will contact and action may be taken
Youth Development Department(s)
The Apprenticeship Programme Operator(s)
The Football Community Trust(s)
FA Case Management Team
Possible Outcomes:
Further information requested;
Advice/warning as to future conduct/sanctions;
Further training/support needed;
Sanction by Lead Department*
No case to answer
Referral to Case Management Team for action, this may also include referral on to the Local Authority Designated Officer (LADO)
Phase 1: All complaints of poor practice should be dealt with via clubs complaint procedure in the first instance
Phase 2: Appeals may be taken to the football authorities responsible for the programme, as above* or to the County FA Welfare Officer
Complaints of Poor Practice may be referred to the FA Case Management in the first instance if the complainant wishes or to the Independent Football Ombudsman.
Is the CYP in need of medical attention?
Yes
No
Telephone for an ambulance or take the CYP to hospital. You need to inform the parents you are doing this*.
Inform the doctor of your concerns in relation to the child protection issues (the doctor will take the appropriate action).
Inform your Club DSO of the action you have taken and they will inform FA Case Management
Possible Outcomes:
Referral to LADO
Police enquiry
Criminal proceedings
Civil proceedings
Referral to Independent Safeguarding Authority (ISA)
No further Action
*If parents are allegedly involved in the abuse, only inform them that you are taking the child to hospital. DO NOT share any other information
Does the abuse involve the Club DSO?
No
Yes
Contact the club DSO immediately and follow their guidance
Contact FL / PL lead designated officer immediately for advice or the NSPCC helpline and follow their guidance
The Club DSO or FL/PL lead designated officer will inform as necessary either:
Children's Services
Police
FA Case Management
If you have been unable to contact your designated FL/PL lead designated officer or club officer immediately either contact:
Children's Services
Police
NSPCC 24 hour Helpline
FA Case Management

DOCUMENT CONTROL

CHANGES HISTORY

Version	Date	Amended by	Recipients	Purpose
1.0	March 2016	Richard Groves - DSO	All	
1.1	April 2017	Richard Groves – DSO	All	
1.2	April 2018	Richard Groves – DSO	All	
1.3	May 2018	Matthew Foster - DSO	All	Update to meet legislation
1.4	2019	Dee Ashton – DSO	All	
1.5	October 2022	Tracey Fidler -DSO	All	New DSO updated, Removed. Community DSO. Split Children's and Adult Policy
1.6	Sept 2023	Tracey Fidler - DSO	All	Updated SWFCCP Contacts as Safeguarding Leads. Amendment to Link index.
1.7	January 2024	Tracey Fidler -DSO	All	Amended legislative DofE Policy update. Amended FA SG Lead details. Updated new Health Manager SWFCCP
1.8	July 2024	Samuel Tye -DSO	All	New DSO updated Updated with KCSIE updates 2024. Added non recent concerns of abuse, low level of concerns, late collection of a child and matchday guidance on lost child/under 14's ejections. Updated definition child on child abuse, Online safety and communicating with children.

APPROVAL

This document requires the following approvals.

Name	Position	Date Approved	Version
Lindsey Hinton	Club Secretary / SSM	October 2022	1.5
Dejphon Chansiri	Chairman	October 2022	1.5

DISTRIBUTION

This document has been distributed to:

Name	Position	Date	Version
SWFC Intranet and Website	All	September 2023	1.6
SWFC Intranet and Website	All	January 2024	1.7
SWFC HUB & Community SMT	All	July 2024	1.8