



Brighton & Hove Albion FC

Albion in the Community

Safeguarding Policy & Procedures

Version Number	Purpose/Change	Author	Date
1.0	First version		Nov 2013
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Introduction to the Policy

Brighton & Hove Albion FC (“BHAFC” or “The Club”) and Albion in the Community (AIRC) seek to ensure the safety and well-being of all children, young people and vulnerable adults who engage in activities with the Club or Charity.

We recognise that we have a moral and legal responsibility for the safety and welfare of children, as defined by The Children’s Act 1989 and 2004.

The Club/Charity believes that it is always unacceptable for a child, young person or vulnerable adult to experience abuse of any kind and recognises that all adults working at the Club have a duty and a responsibility to safeguard the welfare of all children, young people and vulnerable adults through a commitment to the development of a culture and good practice that protects them from harm.

If you work or intend to work with children, young people or vulnerable adults, 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.

This policy is supported by all senior managers and has been approved by the BHAFC Board of Directors, the BHAWFC Board of Directors and the AIRC Board of Trustees.

Scope

This policy applies to all those working with children, young people and vulnerable adults for or on behalf of BHAFC, BHAWFC and Albion in the Community (AIRC) including permanent, casual, volunteers and contractors regardless of their role. Where the policy refers to BHAFC or ‘the Club’ this also includes AIRC.

All the requirements are mandatory 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 those working with children, young people and vulnerable adults for or on behalf of the Club must make themselves aware of the Club’s Safeguarding Policy & Procedures and where appropriate their work with children, young people and vulnerable adults will be supported by safeguarding training.

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

Activities undertaken by Club departments at the following locations fall under the remit of this policy (this list is not exhaustive).



The American Express Community Stadium

- First Team and Academy Fixtures
- Stewarding and all other match day activities
- Stadium tours, children's birthday parties and events
- Seagulls megastore
- Young Seagulls activities
- AITC programmes and activities

The American Express Elite Football Performance Centre & other venues

- First Team training, Academy matches and training
- BHAWFC first team and reserve team training
- RTC training
- Educational provision for Academy school boys and scholars
- All medical provision for children and young people under 18 years
- Academy Host Family provision
- AITC programmes and activities

The Club's safeguarding policy and procedures meet the requirements of the English Football League (EFL), The EFL Trust, The FA Safeguarding Children Rules, The Children Act 2000 and Working Together to Safeguard Children 2015.

The Club also adheres to Affiliated Football's safeguarding policy "Working Together to Safeguard Football".

See also Appendix 7 for details of legislation which underpins this policy and these procedures.

Definitions

Definition of a **child** or **young person**:

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

Definition of a **vulnerable adult**:

A vulnerable adult is a person aged 18 years or over, who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.



Aims and Key Principles of the policy

The **aims** of this safeguarding policy are to:

- Ensure safeguarding policies and practice are interlinked and embedded throughout all areas of the Club, making BHAFC a safe and responsible employer and service provider.
- Develop a positive pro-active approach to safeguarding in order to best protect all children, young people and vulnerable adults associated with the club who play football or engage in associated activities, enabling them to participate and achieve in an enjoyable and safe environment.
- Demonstrate best practice in safeguarding children, young people and vulnerable adults, which is embedded and joined up throughout all areas of the Club.
- Facilitate the provision of a range of child protection and awareness training for staff and volunteers in conjunction with, and supported by, The Football Association, (The FA) the English Football League (EFL) and in line with guidance from Local Safeguarding Children Boards (LSCBs).
- Promote ethical work with children, young people and vulnerable adults.
- Work towards achieving the National Standards for Safeguarding and Protecting Children in Sport devised by the Child Protection in Sport Unit (CPSU) of the NSPCC.

The **key principles** underpinning this Policy are:

- The welfare of children, young people and vulnerable adults is, and must always be, the paramount consideration.
- All children, young people and vulnerable adults have a right to be protected from abuse regardless of their age, sex, disability, sexual orientation, race, religion or belief.
- All suspicions and allegations of abuse will be taken seriously and responded to efficiently and appropriately.
- Working in partnership with other organisations such as Children's Services Departments, and Local Safeguarding Children Board (LSCB), agencies within football (e.g. The FA, The EFL and the EFL Trust) as well as children, young people, vulnerable adults and their parents/carers is an essential element of our work.



Safeguarding Framework

The club's arrangements in fulfilling its commitment to safeguarding children, young people and vulnerable adults include:

1. Responsibilities – Key Roles

- The Senior Safeguarding Manager is the senior manager with overall responsibility for safeguarding. The Senior Safeguarding Manager for BHAFC is Paul Barber, Chief Executive. The Senior Safeguarding Manager for AITC is Martin Perry, Chairman AITC and Director of BHAFC.
- The Club Welfare Officer is responsible for ensuring all safeguarding concerns from all areas of BHAFC/AITC are correctly recorded, reported to the Senior Safeguarding Manager(s) and referred to the appropriate agencies. All concerns, allegations or disclosures will be referred to the Club Welfare Officer who will make a decision as to the seriousness and nature of the information and will, where appropriate refer and report to the appropriate statutory agency (e.g. the Police, Children's Social Care Team) and The FA Case Management Unit. The Club Welfare Officer will keep the Senior Safeguarding Manager informed of serious issues. Poor practice issues will be dealt with by the Club Welfare Officer (or DSO in the case of the Academy) in conjunction with the appropriate senior manager.
- The Designated Safeguarding Officers (DSO) are the designated people within each business area of the club to provide support and refer all issues upwards to the Club Welfare Officer. Often the DSO is the first point of contact for any safeguarding concerns or disclosures that arise in their business area. The Academy DSO will also act as the Deputy Club Welfare Officer for the Club/AITC.
- The departmental Welfare Officers (WO) will act as safeguarding champions and provide advice for colleagues who have concerns on how to report them correctly.

Employees occupying any of the roles above will be issued with a role description setting out the key responsibilities.

Appendix 4 contains names and contact details for all relevant safeguarding staff and external contacts.

Appendix 6 contains role descriptions for the roles of Club Welfare Officer and Designated Safeguarding Officer.

2. Safe Recruitment

The Club will put in place safe responsible recruitment processes which will include:-

- Recruitment of staff must be undertaken through the correct authorisation procedure to ensure that no aspect of this process is missed.



- Job descriptions which highlight the key responsibilities of the role
- Adverts which clearly state the key responsibilities of the role
- Statements in job adverts and in job descriptions highlighting the club's commitment to safeguarding
- Applications will always need to be in writing
- Confirmation of the identity of the applicant with original documentation. This will include proof of name, address and photo identification.
- Confirmation of the right to work in the UK
- Shortlisting and interviewing as appropriate to the role. Each candidate will be interviewed by at least two members of staff before any offer is made
- Employment offers subject to: suitable references and the relevant Criminal Records Checks* (CRCs) including checks of the Disclosure and Barring Service (DBS) Barred Lists as appropriate (e.g. those working in regulated activity will be subject to an enhanced check which must be renewed every 3 years).
- Appropriate risk assessments in relation to employees with content on their CRC checks
- Appropriate procedures will be followed in relation to storing data relating to CRC's and the Club will follow FA and EFL guidelines relating to checking employee's eligibility to work in football on the "Whole Game System" and "FA Member Services".
- Until such time as the appropriate pre-employment checks are complete, the individual concerned will not be permitted to commence work.
- The taking up of two written references
- Substantiating qualifications e.g. requesting original copies of certificates
- An induction appropriate to the role including a safeguarding induction
- A probationary period appropriate to the role
- Identification and facilitation of training needs

In respect of recruitment checks, the Protection of Freedoms Act 2012, requires that those working with children "in regulated activity" must have an Enhanced Disclosure and Barring Service (DBS) Criminal Records Check with Children's Barred List.

In line with Government guidance, affiliated football has defined which roles and tasks constitute regulated activity and therefore are legally required to have a check. Affiliated football has also defined which roles outside of regulated activity require Enhanced or Standard DBS checks and which roles may have a Basic check.

Enhanced checks are exempt from the Rehabilitation of Offenders Act (1974) and therefore those eligible for this level of check, for their work with children, are required to declare all previous convictions, including spent convictions, which have not been filtered by the Disclosure and Barring Service.

3. Training



The club provides in-house training for all staff on identifying and reporting concerns in respect of safeguarding. The club is committed to ongoing safeguarding training and development, appropriate to the role of the employee and the level of their involvement with children, young people and vulnerable adults. Where, due to the nature of their role an employee must attend an external training course such as the FA Safeguarding Children Workshop, the Club will ensure appropriate records are kept and that the qualifications are updated at the recommended intervals.

4. Sharing Information

The club is committed to the sharing of information to protect children and vulnerable adults, in line with Working Together (2015) and the Data Protection Act (1998).

5. Raising Awareness

Ensuring that all staff understand the safeguarding philosophy of the club is of paramount importance.

To support this, the club will:

- Establish a Safeguarding Working Group which is chaired by a member of the Board of BHAFC, BHAWFC and AITC Trustees, Martin Perry.
- Maintain a network of Designated Safeguarding Officers (DSO) and Welfare Officers (WO)
- Ensure safeguarding policies are accessible to all staff
- Ensure safeguarding is included as part of the induction process for new staff
- Ensure staff are aware of the relevant welfare contacts at the club
- Actively encourage staff to contact their WO or DSO with any welfare concerns
- Provide opportunities for staff to update and increase their knowledge

Definition of “Position of Trust”

A position of trust is any position where an individual is in a relationship of trust with any person for whom they have responsibility or authority over. This includes without limitation those who care for, advise, supervise, train, coach, teach, manage, tutor, mentor, assess, develop, guide, treat or provide therapy to children, young people or vulnerable adults. The power and influence a member of staff or volunteer has over a child, young person or vulnerable adult cannot be underestimated, and it is therefore vital that staff and volunteers recognise their responsibility in ensuring that they do not abuse their position of trust. BHAFC also acknowledges children can suffer at the hands of other children and it must be understood that the notion of ‘relationship of trust’ applies as much to children in their various roles as it does to adults involved in football.

Definitions of Good Practice, Poor Practice and Abuse

Good Practice



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

- Be a role model, displaying consistently high standards 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, young people and vulnerable adults equally and with respect and dignity.
- Always put the welfare of the child, young person or vulnerable adult 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, young person or vulnerable adult. Physical contact can be appropriate so long as it is neither intrusive nor disturbing and the child, young person or vulnerable adult'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, young person or vulnerable adult's room or invite children, young people or vulnerable adult's 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 (this list is not exhaustive):

- Taking insufficient care is taken to avoid injuries (e.g. by excessive training or inappropriate training for the age, maturity, experience and ability of players)



- Allowing abusive or concerning practices to go unreported (e.g. a coach who ridicules or criticises players who make a mistake during a match)
- 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, young people or vulnerable adults.
- Taking children, young people or vulnerable adults alone in a car on journeys, however short.
- Taking children, young people or vulnerable adults to your home where they will be alone with you.
- Sharing a room with a child, young people or vulnerable adult.
- Engaging in rough, physical or sexually provocative games, including horseplay.
- Allow or engage in inappropriate touching of any form.
- Allowing hazing practices to go unreported
- Placing children or vulnerable adult in potentially compromising and uncomfortable situations with adults (e.g. inappropriate use by a coach/staff member of social media with a young player)
- Allowing children or young people to use inappropriate language unchallenged.
- Making sexually suggestive comments to a child, young person or vulnerable adult, even in fun.
- Reducing a child, young person or vulnerable adult to tears as a form of control.
- Allowing allegations made by a child, young person or vulnerable adult to go unchallenged, unrecorded or not acted upon.
- Doing things of a personal nature that the child, young person or vulnerable adult can do for themselves.
- Ignoring health and safety guidelines (e.g. allowing young players to set up goalposts unsupervised by adults)
- Failing to adhere to the club's code of practice (e.g. openly verbally abusing the referee)
- Giving continued and unnecessary preferential treatment to individuals

The key message to those working with children, young people or vulnerable adults is: **If in doubt....don't do it.**

Child 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 by another child/children or young person.

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



- Neglect
- Physical Abuse
- Sexual Abuse
- Emotional Abuse
- Bullying

In addition to the above, a Vulnerable Adult may also be at risk of **Financial Abuse**.

See Appendix 1 for full details, signs and indicators of abuse.



What to do if you suspect poor practice or abuse has occurred

If you are concerned about the welfare of a child, young person or vulnerable adult or if you are concerned about an adult's behaviour towards a child or young person you **MUST ACT**.

It is not your responsibility to decide whether or not poor practice or child abuse has taken place. However you do have a responsibility to report any concerns.

How to raise concerns about poor practice

All concerns or allegations of poor practice should be reporting to the Designated Safeguarding Officer or directly to the Club Welfare Officer. The Club Welfare Officer with assistance where appropriate from the line manager, will investigate the concerns. The Senior Safeguarding Manager will be made aware of the outcome and forwarded the appropriate documentation. Disciplinary procedures may be initiated by the Head of HR.

The judgment about whether an incident is one of poor practice or child abuse may not be able to be made at the point of referral, but only after the collation of relevant information.

The majority of poor practice concerns can be dealt with by the Club and/or with support and guidance from the EFL or The FA.

A referral will be sent to the FA by the Club Welfare Officer (using the Affiliated Football Referral Form) where there are three or more incidents of poor practice by the same individual, this is the case whether the incidents are the same type of poor practice, or for different forms of poor practice.

How to raise concerns about suspected abuse within the football/supervised activity environment

- If a child, young person or vulnerable adult is at immediate risk of harm, **CALL THE POLICE**.
- Inform the Designated Safeguarding Officer or the Club Welfare Officer as soon as practicable.
- Any suspicion that a child, young person or vulnerable adult has been abused by either a member of staff, a volunteer or club contractor should be reported to the Designated Safeguarding Officer or directly to the Club Welfare Officer, who will take such steps as considered necessary to ensure the safety of the child, young person or vulnerable adult in question and any other child, young person or vulnerable adult who may be at risk.
- The Club Welfare Officer will refer the allegation to the appropriate statutory agencies (e.g. The Local Authority and/or the Police as well as the EFL and the FA). Referrals made to the FA will be documented using the Affiliated Football Referral Form.
- The parents or carers of the child, young person or vulnerable adult will be contacted as soon as possible, if applicable following advice from statutory agencies
- The Senior Safeguarding Manager will be notified and kept informed
- If the Club Welfare Officer is the subject of the allegation, the report should be made to the Senior Safeguarding Manager who will refer the allegation to the statutory agencies



How to raise concerns about suspected abuse outside the football environment:

- If no safeguarding officer is available and a child, young person or vulnerable adult is at immediate risk of harm, CALL THE POLICE. Inform the Designated Safeguarding Officer or Club Welfare Officer as soon as practicable.
- If a child is not at immediate risk of harm, contact :
 - The Club Welfare Officer (who will contact the appropriate statutory agencies)

Or if you are not able to contact a club safeguarding officer, you may call one of the following people for advice:

- Ann Hussey (The Football League Child Protection Advisor) Mob: 07795 628379
- Sandra Redhead (Sussex County FA Welfare Officer) – 01903 768 578 or 07525 667076
- **You can also call the NSPCC 24 hour Helpline for advice on Tel: 0800 800 5000**

The Club Welfare Officer must be informed what action has been taken as soon as practicably possible.

Confidentiality

Every effort will be made to ensure that confidentiality is maintained for all concerned. Information will be handled and disseminated on a need to know basis only.

This includes:

- The Club Welfare Officer and the HR team
- The parent/guardian of the person who is alleged to have been abused
- The person making the allegation
- Statutory agencies (e.g. The Police, the Local Authority)
- Dependent on the role, the FA, the EFL

Information will be stored in line with the Data Protection Act 1998

Management of allegations against a child, young person or vulnerable adult

Any allegation concerning the abuse of a child, **young person or vulnerable adult** by another child, **young person or vulnerable adult** must be dealt with through this policy. Any such allegation should be reported immediately to the Club Welfare Officer who will contact the Local Authority for advice. A decision will be made as to whether the alleged abuser should continue in their activity on the probability of risk to others.

Management of allegations against a member of staff

The Club will fully support and protect anyone who in good faith reports his or her concern that a colleague or another is or may be abusing a child, young person or vulnerable adult.

Where there is a complaint against a member of staff there can be 3 types of investigation:

1. A criminal investigation led by the Police
2. A child protection investigation led in a multi-agency approach by the Local Authority



3. A disciplinary or misconduct investigation led by the Club, which may also involve the The FA (role dependent)

The results of the police and child protection investigation may well influence the disciplinary investigation.

No internal investigation will commence until the Club Welfare Officer has sought advice from the Local Authority Designated Officer (LADO). Suspension on full pay will be decided by the Head of HR in consultation with the appropriate Senior Safeguarding Manager in line with the club's Disciplinary Procedure. The Club will assess all individual cases to decide whether a member of staff or volunteer can be reinstated and how this can be sensitively handled. This will be dependent on the outcome of any criminal investigation and the Club will ensure that it does not breach the Safeguarding Vulnerable Groups Act 2006 by reinstating a person who is on the barred list.

Any decision taken will be taken with due consideration; particularly where there is insufficient evidence to uphold any criminal action by the Police. In such cases, BHAFC will reach a decision based upon all the available information which could suggest that on a balance of probability; it is more likely than not that the allegation is true. The welfare of the child should remain of paramount importance throughout.

In the event that a member of staff is dismissed for a safeguarding related reason the Club Welfare Officer will act in accordance with FA regulations and DBS guidelines and make the necessary referral to the DBS, the FA and the EFL as appropriate.

What to do if you receive a safeguarding disclosure from a child, young person or vulnerable adult

If a child informs an employee directly that they are concerned about someone's behaviour towards them, this is known as a **disclosure**. Children or young people who may be vulnerable or vulnerable adults are likely to disclose abuse to those they trust and it is extremely important that you know how to respond to a disclosure.

Step 1

Deal with the disclosure as it happens and ensure that the child, young person or vulnerable adult'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, young person or vulnerable adult who may be at risk.

You must:

- Put your own feelings aside and listen calmly even if what they are telling you is upsetting or shocking
- Allow the child/young person/vulnerable adult to lead the discussion and to talk freely.



- Listen to what the child/young person/vulnerable adult 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/vulnerable adult stops talking for a while - silences are OK. You don't have to rush to fill the gaps.
- Accept what the child/young person/vulnerable adult says without challenge.
- Listen to the child/young person/vulnerable adult without investigating.
- Allow the child/young person/vulnerable adult 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/vulnerable adult 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/vulnerable adult 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/vulnerable adult to remove or adjust their clothing to observe them.
- Tell the child/young person/vulnerable adult who you will be contacting e.g. Designated Safeguarding Officer or the Club's Welfare Officer, 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/vulnerable adult.

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/vulnerable adult is disclosing. This should be done as soon as possible (using a referral form) after the child/young person/vulnerable adult has disclosed to you.
- After the child/young person/vulnerable adult has disclosed, the conversation must be documented remembering as accurately as you can, the words and phrases used by the child/young person/vulnerable adult to describe what has happened to them.
- Investigate but do listen and reassure the child/young person/vulnerable adult that they are doing the right thing by disclosing.
- Give the impression that you might blame the child/young person/vulnerable adult 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/vulnerable adult may have.



- Make false promises and/or promise confidentiality – it should be explained that the child/young person/vulnerable adult 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/vulnerable adult discloses they are 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/vulnerable adult if they have not initiated the contact. They may be upset by physical contact.

Step 2

If a child is at **immediate risk** of harm, **CALL THE POLICE**.

As soon as possible, once the immediate comfort and safety of the child/young person/vulnerable adult is secured, you must inform the Department Safeguarding Officer or the Club Welfare Officer of the disclosure.

The Club Welfare Officer will then contact the appropriate statutory agencies.

Or if you are not able to contact a club DSO or the Club Welfare Officer, you may call one of the following people for advice:

- Ann Hussey (The Football League Child Protection Advisor) Mob: 07795 628379
- Sandra Redhead (Sussex County FA Welfare Officer) – 01903 768 578 or 07525 667076
- **You can also call the NSPCC 24 hour Helpline for advice on Tel: 0808 800 5000**

The Club Welfare Officer must be informed what action has been taken as soon as practicably possible.

Step 3

You should note down details using the Club referral form (see Appendix 4) 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.

Wherever possible, you must record information as it was told to you using the language of the child/young person/vulnerable adult 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.



The completed referral form must be passed immediately to the Club Welfare Officer (digitally if possible) at rose.read@bhafc.co.uk. Any original documentation must be passed to the Club Welfare Officer to be stored securely.

What happens next?

You should be informed by the Designated Safeguarding Officer or the Club Welfare Officer what has happened following the report being made.

All matters will be fully investigated and appropriate action taken. Action may include referral to a statutory agency as appropriate and if seen to be required by the Club Welfare Officer. Any referral to an external agency shall also be reported to the Senior Safeguarding Manager.

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:-

TAKE ACTION AND REPORT YOUR CONCERNS

A full list of contact details can be found in **Appendix 6**.

Whistle-blowing Policy

All organisations face the risk of things going wrong or of unknowingly harbouring malpractice. The Club believes it has a duty to identify such situations and take the appropriate measures to remedy the situation. By encouraging a culture of openness within our organisation, BHAFC believes it can help prevent malpractice – prevention is better than cure. That is one of the aims of this policy.

Our full whistle-blowing policy can be found in our Staff Handbook.

Use of Photography & Film Images

The Club takes its guidance on the use of images from guidelines issued by The FA and The EFL. All images are taken by Club officials who have been briefed by a Club Safeguarding Officer or by a member of the Media & Communications team responsible for the activity being photographed or filmed. Before taking images of children, young people or vulnerable adults, parental (or other appropriate) 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.

Social Media

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, young people and vulnerable adults when using these forms of media.

Do not add/invite children, young people or vulnerable adults you have responsibility for in football as 'friends' within social networking sites such as Bebo, 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.

Social Media is dealt with in full in the Club's Social Media Policy, which is contained within the staff handbook.

If you are concerned about an adult's use of social media towards a child, young person or vulnerable adult, raise your concern with your Designated Safeguarding Officer or the Club Welfare Officer.

Online Grooming

Online grooming 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.

If you have any concerns in relation to online grooming, raise your concern with your DSO or the Club Welfare Officer.

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.

If you have any concerns in relation to CSE, raise your concern with your DSO or the Club Welfare Officer

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 ,young person or vulnerable adult you must **notify your DSO or the Club Welfare Officer immediately.**

In addition to our duties under PREVENT, the Club works closely with the EFL to uphold high standards in accordance with The Code of Practice on Inclusion & Anti-Discrimination. The Club also works closely with agencies such as Kick It Out to raise awareness and encourage a positive and safe environment for all of our staff and participants.

Review

This Safeguarding Policy and Procedures will be reviewed on an annual basis **or after legislation change or after any serious incident.**

Board Approval

This Safeguarding Policy and Procedures was ratified and minuted at a meeting of the Board of Directors (BHAFC) on [insert date]

Name: Paul Barber, Chief Executive

Signed:

Date:

This Safeguarding policy was ratified and minuted at a meeting of the Board of Trustees (AITC) on [insert date]

Name: Martin Perry – Chair of Trustees

Signed:



Date:



Appendix 1 - Signs and Indicators of Abuse

Abuse is any form of physical, emotional or sexual mistreatment or lack of care that leads to injury or harm. It commonly occurs within a relationship of trust or responsibility and represents an abuse of power or a breach of trust. Abuse can happen to a child or vulnerable adult regardless of their age, gender, race, ability, race or sexual orientation.

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

- **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/vulnerable adult.

Category of abuse	Description	Physical signs	Behavioural signs
Physical abuse	Physical Abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of or induces illness in a child and where an adult gives alcohol or drugs to a child.	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	Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may involve failing to provide adequate food, shelter including exclusion from home or abandonment, failing to protect a child from physical and emotional harm or danger, failing to ensure adequate supervision including the use of inadequate care-takers, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.	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	Sexual Abuse is when adults, of either sex, or other children, use children to meet their own sexual needs. It involves forcing or enticing a child to take part in sexual activities,	Physical signs such as genital pain, itching, bleeding, bruising, discharge,	Behavioural signs such as apparent fear of someone, nightmares, running away,



	including prostitution, whether or not the child is aware of what is happening. The activities may involve contact including penetrative acts or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.	stomach pains, discomfort, pregnancy, incontinence, urinary infections or STDs, thrush, anal pain on passing motions.	sexually explicit knowledge or behaviour, masturbation, bed-wetting, eating problems, substance abuse, unexplained money or gifts, acting out with toys, self-harm.
Bullying/Cyber Bullying	Bullying is the deliberate attempt by an individual or group to hurt, torment, tease, frighten or upset someone causing him/her to feel intimidated, uncomfortable or unhappy. Bullying includes racist and homophobic behaviour. Bullying can be the physical, mental or emotional abuse of a person. It can take many forms, some more obvious than others. Cyberbullying is the use of electronic and digital media to scare, harass or intimidate another person.	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	Emotional Abuse is the persistent ill treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve making the child feel or believe that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying causing children to frequently feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may also occur alone.	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.
Financial Abuse	Theft, misuse of property, possessions and insurance, blocking access of		



(Applicable to Vulnerable Adults)	person to their assets, and extortion		
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In addition to those listed above, it is important to be aware of the following:

Hazing

Hazing is any action or situation, with or without the consent of the participants, which recklessly, intentionally, or unintentionally endangers the mental, physical or emotional wellbeing of a child. An example of hazing is unwelcome initiation ceremonies. Hazing is not tolerated at any level of football.

Domestic Violence

Domestic violence is an important indication of risk or harm to children, who may suffer directly or indirectly if they live in households where there is domestic violence. Domestic violence is likely to have a damaging effect on the health and development of children.



Appendix 2 – Role Description for Club Welfare Officer

The Role of the Club Welfare Officer 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:

- Ensure Club compliance with statutory obligations under relevant legislation and the EFL's safeguarding Rules
- To set up and maintain the Club's Safeguarding Working Group, ensure quarterly meetings occur and organise CPD sessions as required
- Work closely with and report on a regular basis to the Senior Safeguarding Manager.
- Work closely with HR and heads of departments to develop and implement safer recruitment and induction practices across the organisation.
- Continuously work to maintain, embed and improve the Club's safeguarding provision ensuring the highest standards for safeguarding across all areas of the Club.
- Manage the development, implementation, promotion and review of the Club's safeguarding policies, practices and good practice guidelines.
- Named lead member of staff to manage safeguarding incidents, concerns and allegations.
- Named 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 and allegations.
- 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.
- Manage the implementation of the Club's action plan for safeguarding.
- Lead and provide direction to the Designated Safeguarding Officers and Welfare Officers.
- Ensure that DSO's and WO's are trained, supported and supervised.
- Act as the Club's lead source of safeguarding support, advice and expertise.
- Ensure the development and implementation of safeguarding education specific to individual roles and responsibilities to ensure that staff develop and maintain the necessary skills and knowledge to safeguard vulnerable groups.
- Ensure staff understand their individual responsibilities to safeguard and promote the welfare of vulnerable groups.
- Develop relationships with statutory and football authorities.
- Pro-actively promote and raise safeguarding awareness.
- Promote a safe working environment.
- Attend regular safeguarding training and maintain an up to date knowledge base of relevant legislation, regulations and best practice.
- Provide regular reports to Senior Safeguarding Manager on the effectiveness of the Club's Safeguarding strategy.



- Represent the Club as Lead Case Manager when cooperating with/reporting directly to external statutory agencies such as Police, Local Safeguarding Children Board, Children's Services or Safeguarding Adults at Risk Team.

Role Description for Designated Safeguarding Officers (DSO)

The role of the Designated Safeguarding Officer (SO) is to: Support the Club Welfare Officer 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:

- To work with the Club Welfare Officer to implement and promote the Club's safeguarding policies and procedures within their department.
- To be an active member of the Club's Safeguarding Working Group and attend meetings and CPD sessions as required
- Contribute to maintaining and improving the Club's safeguarding provision.
- Advise others working with vulnerable groups on the implementation of organisational policies and procedures to safeguard and promote the welfare of vulnerable groups.
- Ensure staff understands their individual responsibilities to safeguard and promote the welfare of vulnerable groups.
- Act as a source of safeguarding support, advice and expertise within their department.
- Support colleagues to respond appropriately to concerns about the welfare or safety of vulnerable groups.
- To give direction and guidance to staff in respect of safeguarding incidents, concerns and allegations and assist the Head of Safeguarding with managing these.
- Assist the Club Welfare Officer to maintain accurate and confidential information.
- Pro-actively promote and raise safeguarding awareness.
- Promote a safe working environment.



Appendix 3 – Anti-Bullying Policy

Anti-Bullying Policy

We are committed to providing a safe and friendly environment for all. Bullying of any kind is unacceptable and will not be tolerated, including any form of cyber bullying in any form direct or by proxy. If bullying does occur, all club staff, parents and children should know that incidents will be dealt with promptly and effectively. It is expected that anyone who knows of bullying that is happening must inform their line manager, or if applicable their club contact.

Objectives:

- To have a clear understanding of what bullying is
- To know what the anti-bullying policy is and follow it when bullying is reported
- All children and their parents/carers should know what the anti-bullying policy is and what they should do if bullying arises.
- To take bullying seriously and not tolerate it

The importance of responding to bullying

Nobody deserves to be a victim of bullying. Everybody has the right to be treated with respect. Individuals who are bullying need to learn different ways of behaving. The impact upon a child can be devastating and in some cases can affect all aspects of their life. In extreme circumstances it can lead to suicide threats or even attempts.

Bullying Signs & Symptoms

Bullying is the deliberate attempt by an individual or group to hurt, torment, tease, frighten or upset someone causing him/her to feel intimidated, uncomfortable or unhappy. Bullying includes racist and homophobic behaviour. Bullying can be the physical, mental or emotional abuse of a person. It can take many forms, some more obvious than others. The following are examples of bullying that staff should watch out for:

- Says that he/she is being bullied
- Is unwilling to go to sessions
- Becomes withdrawn, anxious or lacking in confidence
- Comes home with clothes torn or training equipment damaged
- Has possessions go missing
- Asks for money or starts stealing money
- Has unexplained cuts or bruises
- Gives improbable excuses for any of the above

In more extreme cases:

- Starts stammering
- Becomes aggressive, disruptive or unreasonable
- Is bullying other children or siblings
- Stops eating
- Attempts or threatens suicide or runs away



Anti-Bullying Procedure

1. Report the bullying incident(s) to the DSO or the line manager
2. The behaviour or threats of bullying must be investigated and the bullying stopped quickly.
3. In cases of serious bullying, the incidents will be referred by the Club Welfare Officer to the appropriate external agency.
4. The parents of the victim and the accused should be informed and will be asked to come in to a meeting to discuss the incident(s)
5. If necessary and appropriate, the police will be consulted
6. Attempts will be made to help the bully (bullies) change their behaviour
7. If mediation fails and the bullying is seen to continue, disciplinary action will be initiated.

Recommended action for children bullying other children:

If the coach and DSO jointly decide it is appropriate for them to deal with the situation they should follow the procedure outlined below:

1. Reconciliation involving all parties. It may be that a genuine apology is the solution.
2. If this fails or is not appropriate, a panel consisting of the DSO, the coach and the line manager and/or the appropriate external agency should meet with the parent and child alleging bullying to get details of the allegation. Minutes should be taken and agreed.
3. The same panel must meet with the alleged bully and parent, informing them of the incident and inviting them to give their view of the allegation. Minutes should again be taken and agreed.
4. If bullying has in the panel's view taken place, the individual should be warned and put on notice of further action i.e. a temporary or permanent suspension if the bullying continues.
5. The situation should be monitored for a set period to ensure bullying is not being repeated.
6. Relevant individuals (e.g. Club Welfare Officer) should be made aware of the concerns and outcome of the process.

Recommended action for adults bullying children

In the case of adults reported to be bullying anyone within the club under the age of 18:

1. The Club Welfare Officer should always be informed and will advise.
2. A panel consisting of the line manager, the Club Welfare Officer (or DSO as appropriate) and if deemed necessary further panellists should meet with the child alleging bullying and parents to get details of the allegation. Minutes should be taken and agreed.
3. The same panel should meet with the adult and representative informing them of the incident and for them to give their view of the allegation. Minutes should again be taken and agreed.
4. More serious cases will be referred to the Police and/or appropriate external agencies.

Appendix 4 - Safeguarding Children Referral Form



(Internal – to be used by employees who have received a disclosure from a child, young person or vulnerable adult)

Your name:	Date:
Your position:	Contact Tel No:
Child's name:	Gender: Male Female
Child's date of birth:	Age:
Child's address:	Child's contact tel No:
Parents/carers names and addresses:	Contact tel no:
Date and time of any incident:	
Place of incident:	
Name of the person (s) alleged to be responsible for the cause of the significant harm:	
Exactly what has been disclosed:	
Observations or background information :	
Action taken so far:	



Appendix 5 – External Agencies Contacted record (Club Welfare Officer Use Only)

Police Yes/No	If yes – which: Name and contact number: Details of advice received:
Local Authority Yes/No	If yes – which Local Authority? Name and contact number: Details of advice received:
The FA or the Football League Yes/No	If yes – which body? Name and contact number: Details of advice received:
Other agencies or partners (e.g. NSPCC/CHILDLINE)	Which agency/partner? Name and contact number: Details of advice received:

Signed:

Date:



Appendix 6 - Key Safeguarding Contacts

Club Safeguarding Contacts Role and Job Title	Name	Contact information
Senior Safeguarding Manager (Chief Executive BHAFC) (Chairman AITC)	Paul Barber (BHAFC) Martin Perry (AITC)	paul.barber@bhafc.co.uk martin.perry@bhafc.co.uk
Club Welfare Officer (Head of HR)	Rose Read (BHAFC/AITC)	01273 878286 (office) 07584 102291 (mobile) rose.read@bhafc.co.uk
Designated Safeguarding Officers (one for each business area)		
BHAFC (Amex Stadium) (Head of HR)	Rose Read	01273 878286 (office) 07584 102291 (mobile) rose.read@bhafc.co.uk
Academy (Education, Welfare & Player Services Manager) & Asst Club Welfare Officer	Sue Parris	01903 768 557 (office) 07827 235830 (mobile) sue.parris@bhafc.co.uk
AITC (CEO)	Matt Dorn	01273 878235 (office) 07876898037 (mobile) matt.Dorn@albioninthecommunity.org.uk
Matchdays (Safety & Security Manager/Match Day Safety Officer)	Adrian Morris	01273 647249 (office) 07785 460346 (mobile) adrian.morris@bhafc.co.uk
Training Ground/W & G Football (Head of Football Administration)	Paul Mullen	01903 875 600 (office) 07818 499 950 (mobile) paul.mullen@bhafc.co.uk
External Safeguarding Contacts		
English Football League (Child Protection Advisor)	Ann Hussey	01772 325 811 (office) 07795 628 379 (mobile) ahussey@efl.com
The Sussex County FA (County Welfare Officer)	Sandra Redhead	01903 768578 07525 667076 sandra.redhead@sussexfa.com
The FA Safeguarding Team		0800 169 1863 safeguarding@thefa.com
The FA Case Investigations Unit		0844 980 8200 (extension 4787)



Sussex Police		101 - non urgent calls 999 - emergencies
Multi-Agency Safeguarding Hub (MASH) (First point of contact for members of public with safeguarding concerns)		01273 290400 (Outside of normal office hours call the number above to receive a message giving emergency contact details) MASH@brighton-hove.gcsx.gov.uk
Brighton & Hove Local Safeguarding Children Board (LSCB) http://www.brightonandhovelscb.org.uk/		01273 292379
The Local Authority Designated Officer (LADO) for Brighton and Hove City Council. (Responsible for the oversight and management of allegations made against employees). LADO should be informed of all allegations that come to an employer's attention	Darrel Clews	Safeguarding Team, Children's Services, Moulsecoomb Hub North Building, Hodshrove Lane, Brighton, BN2 4SB 01273 295643 (Tel) 07795 335879 (Mobile)
NSPCC		0808 800 5000 (24 hour helpline) www.nspcc.org.uk help@nspcc.org.uk
NSPCC (to report historical/non-recent abuse)		0800 023 2642 (24 hour helpline)
Child Line		0800 1111 2417 www.childline.org.uk
Child Protection in Sport Unit		0116 234 7278 cpsu@nspcc.org.uk www.thecpsu.org.uk
CEOP Centre – Child Exploitation and Online Protection		www.thinkuknow.co.uk www.ceop.police.uk
Royal Sussex County Hospital, Brighton		Eastern Road, Brighton, BN2 5BE 01273 696955
Worthing Hospital		Lyndhurst Rd, Worthing, West Sussex BN11 2DH 01903 205111
Eastbourne District General Hospital		King's Drive, Eastbourne BN21 2UD 01323 417400



Appendix 7 - Other applicable Club Policies:

- Academy Safeguarding Policy
- Academy Transport Policy, Procedures & Guidelines
- Academy Host Family & Accommodation Policy
- Academy Trips, Tournaments & Tours Policy
- Anti-bullying Policy
- Social Media Policy
- Health & Safety Policy
- Data Protection Policy
- Whistleblowing Policy

Relevant Legislation/Regulations/Codes of Practice:

- Working Together to Safeguarding Children 2013 & 2015
- The Football Association's Safeguarding Children Regulations 2016 - 17
- The Children Act 1989 & 2004
- Crime & Disorder Act 1998
- Data Protection Act 1998
- FA Safeguarding Children Rules
- FA Respect Code of Conducts
- EFL Rules
- Human Rights Act 1998
- Police Act 1997
- Protection of Children Act 1999
- Protection of Freedoms Act 2012
- Rehabilitation of Offenders Act 1974
- Safeguarding Vulnerable Groups Act 2006
- Sex Offenders Act 1997
- Sexual Offences Act 2003
- Youth Evidence & Crime Evidence Act 1999
- Affiliated Football – "Working Together to Safeguard Football"
- FA Guidance – Let's Make Football Safe Not Sorry
- Keeping Children Safe in Education (Statutory guidance for schools and colleges) July 2015

Please note that the lists are not exhaustive.