Let's make football safe – not sorry

WORKING TOGETHER TO

SAFEGUARD FOOTBALL

OUR POLICY AND

PROCEDURES
Foreword

On behalf of the NSPCC, Child Protection in Sport Unit, I am delighted to be able to congratulate ‘Affiliated Football’ on the development of and commitment to its inclusive Safeguarding Children Policy and Procedures.

Affiliated Football’s commitment to working together to safeguard children and young people across the game and at all levels of the game is to be applauded. Its well documented that by ‘working together’ safeguards are more effective in supporting and protecting children and young people. It is evident that Football has worked hard to achieve its joined up approach to embedding Safeguards and developing Safeguarding Actions Plans for all aspects of the game, in line with the Sport England/NSPCC National Standards Framework.

As the nations favourite game it’s fitting that football should be setting such a positive example, ensuring consistent safeguards at all levels of the sport.

Anne Tiivas - Director NSPCC, Child Protection in Sport Unit
Commitments

The Football Association

Ensuring safeguards are in place across football remains high on our agenda ensuring the young people who are involved in the game have a safe, positive and enjoyable experience. The FA is committed to building on the safeguards already accepted as common practice throughout the game to continue to strive to make a difference.

Greg Dyke, FA Chairman

Premier League

Safeguarding the welfare and wellbeing of our children and young people in the game is essential to the Premier League and we are committed to working in partnership with our clubs and the football family to create safe, positive and encouraging environments in which they can learn, grow, feel valued and respected.

Richard Scudamore, Premier League, Chief Executive

Football League

The Football League is committed to safeguarding children and young people. We see part of this commitment as contributing to and endorsing the work of ‘The Football Safeguarding Forum’. We are confident that when working together the Football Authorities can have a significant impact in developing a workforce which understands their roles responsibilities and that this, together with a structured framework in which to operate will improve safeguards in football. The Football League welcomes the sharing of good practice guidance for the benefit of football and those young people participating in the sport.

Greg Clarke, Football League, Chairman

Professional Footballers Association

The PFA is committed to ensuring every young person within the professional game is protected from abuse, bullying or harassment by working with our members and the Football Authorities to implement Safeguarding policies, practises and frameworks across the industry.

Ritchie Humphreys, Professional Footballers Association, Chairman

LMA

The League Managers Association is fully committed to the safeguarding and protection of children and young people. We believe that our unique position if the game, gives us the opportunity to highlight our work with the other Football stakeholders, to identify and maintain both good practice and the responsibilities that are an obligation on us all.

Richard Bevan, League Managers Association, Chief Executive

Football Foundation

At The Football Foundation we take every care to ensure that the safeguarding of children is paramount within all of our programmes. Every application to our capital programmes is subject to robust scrutiny to ensure that potential safeguarding risks are identified. Where such risks exist, expert advice and guidance is provided to help applicants mitigate against those risks within the design of the facility and its operational procedures. Facilities that do not meet our high standards in this area are ineligible for funding. All applicants to our ‘Revenue’ Grow the Game scheme must have a Safeguarding Children Policy and Procedures in place. We work closely with our County Football Association colleagues to ensure that football clubs at all levels develop appropriate procedures that adhere to this policy.

Paul Thorogood, The Football Foundation, Chief Executive

League Football Education

League Football Education (LFE) is committed to maintaining the highest possible standards to safeguard the welfare of every young person on the Apprentice Programme and to provide them with a Programme which develops their potential both in football and in education and is free from abuse or bullying. LFE understands it has responsibilities to meet and a role to play, in partnership with other agencies, in providing appropriate support and care for the wellbeing of Apprentices.

Alan Sykes, League Football Education, Chief Executive
1. Introduction

Approximately 4 million children and young people are involved in football. For the vast majority, this is a positive and memorable time which often leads to lifelong engagement with the game be it as a player, ball-boy, official or mascot. But sadly this is not always the case. As such affiliated football remains committed to continuing to raise awareness of safeguarding, developing its support and training across the game, dealing with inappropriate behaviours and promoting best practice.

2. Affiliated footballs safeguarding children policy statement

Every child or young person, defined as any person under the age of 18, who plays or participates in football should be able to take part in an enjoyable and safe environment and be protected from abuse. This is the responsibility of everyone involved in football. Football recognises its responsibility to safeguard the welfare of all children and young people by seeking to protect them from physical, sexual or emotional harm and from neglect or bullying.

Affiliated football is therefore committed to working to provide a safe environment for all children and young people to participate in the sport to the best of their abilities, whether involved in grassroots or professional football.

2.1 Key principles

- The child’s welfare is, and must always be, the paramount consideration
- All children and young people have a right to be protected from abuse regardless of their age, gender, disability, culture, language, racial origin, religious beliefs or sexual orientation
- All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately
- Working in partnership with other organisations, children and young people and their parents and carers is essential.

Affiliated football is committed to working in partnership with the Police, Social Care Departments, and Local Safeguarding Children’s Boards (LSCB) in accordance with their procedures. This is essential to enable these organisations to carry out their statutory duties to investigate concerns and protect all children and young people.

Affiliated football holds with the principle that there are some roles within sport where adults have responsibility for, authority and influence over young people and therefore have an ethical obligation to safeguard and protect young people from exploitation. Whilst legally young people aged 16 and 17 have reached the age of consent for sexual activity, any inappropriate sexual relations with young people aged 16 or 17 will be considered a breach of a ‘Position of Trust’ within affiliated football and will be referred to the appropriate football regulatory authorities and may also be referred to the statutory agencies.
3. Definitions of abuse

Concerns identified as child abuse will fall within the following five categories:

Physical Abuse: A child is physically hurt or injured by an adult or an adult gives alcohol or drugs to a child or young person

Neglect: A child’s basic physical needs are consistently not met or they are regularly left alone or unsupervised

Sexual Abuse: An adult or peer uses a child or young person to meet their own sexual needs

Emotional Abuse: Persistent criticism, denigrating or putting unrealistic expectations on a child or young person

Bullying: Persistent or repeated hostile and intimidating behaviour towards a child or young person

Incidents of poor practice occur when the needs of children and young people are not afforded the necessary priority, so as their welfare is compromised.

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 or young person. Hazing is not tolerated in affiliated football.

4. Affiliated footballs approach to safeguarding

Affiliated football has a three part approach to safeguarding, which includes:

- Getting the right people involved
- Creating a safe environment
- Promoting clear systems

1. Getting the right people involved

Leagues and clubs in affiliated football are required to have ‘Recruitment Procedures’ for all staff and volunteers who are part of the children’s workforce, these procedures should include:

- Role profile or job description which highlights key responsibilities of the role
- Advertising the club or leagues positive stance on safeguarding and equal opportunities
- Confirmation of the identity of the applicant with original documentation
- Short listing and interviewing as appropriate for the role
- Recruitment checks in line with legislation and FA Policy requirements
- Requesting at least two written references; which should be followed up prior to any offer of appointment being made
- Substantiating qualifications e.g. requesting original copies of certificates
- Employment offers are subject to: suitable references and the relevant Criminal Records Checks, including checks of the Disclosure and Barring Service (DBS) Barred Lists as appropriate
- An induction appropriate for the role
- Identifying and facilitating 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 the 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 affiliated football requires those eligible for this level of check, for their work with children, to declare all previous convictions, including spent convictions, which have not been filtered by the Disclosure and Barring Service.

A robust recruitment process is required for all of those working or volunteering with children and young people regardless of whether they are in regulated activity or not. Affiliated football recognises that the Disclosure and Barring Service is one of many important aspects of an effective recruitment process and requires all clubs and leagues to ensure they have safe recruitment procedures in place. For further information about Criminal Record Checks (CRC) in affiliated football please refer to Appendix 1.
4. Affiliated footballs approach to safeguarding

2. Creating a safe environment

Affiliated football is developing and will continue to develop its framework in which the people, the policies and the education programme will raise awareness of the responsibility that every person involved in football has in safeguarding children and young people.

To that end affiliated football will have clear and well publicised policies on:

- Safeguarding and protecting children and young people
- Reporting poor practice and abuse
- Recruitment of staff and volunteers
- Whistle-blowing
- Confidentiality
- Health and safety
- Anti bullying
- Equality
- Codes of conduct (ethics)
- Complaints

In addition there is a requirement for all those working or volunteering with children and young people in football to complete appropriate levels of introductory and ongoing safeguarding training.

In this fast moving world of ever-changing technological improvements and the increasing use of social media affiliated football must be mindful of both the potential benefits and the potential risks to children and young people.

It’s essential that clubs and leagues provide accessible guidance on the appropriate use of social media for players, parents, officials, volunteers and staff. This guidance should not be seen as an obstacle to communication but support to manage their safeguarding responsibilities on and off the pitch effectively.

Further guidance can be obtained via The FA, Premier League and Football League respectively.

3. Promoting clear systems

Affiliated football is committed to working together to ensure that robust and consistent safeguarding systems exist across the game through a collaborative approach to safe recruitment, accessible education programmes and a coordinated approach to the sharing of information.

Affiliated football requires that all levels of the game have a Designated Safeguarding Officer (DSO) responsible in each club and league with youth team(s). The DSO must be appropriately recruited, trained and supported. This will be the person to whom any concern regarding the welfare of a child must be reported. It is essential that everyone involved in football recognises that **taking no action when there is a concern regarding the welfare of a child is not an option**.

To support this process affiliated football will also communicate clearly on:

- how to raise concerns about a child’s welfare
- how to manage poor practice concerns
- what to do if you wish to make a complaint
- how to appeal any decisions made
- support that is available for those involved in disclosing, reporting or managing allegations of abuse

Further information is provided in greater detail by the relevant football bodies as follows:

- Football League – Safeguarding Children and Young people: Guidance to Member Clubs
- Premier League Safeguarding Vulnerable Groups and Safer Recruitment Rules
- The FA, Working Together to Safeguard Children in Grassroots football: Policy and Procedures

It’s important that this document is read in conjunction with the relevant supporting rules, policy and guidance specified by the individual football bodies. All policies and guidance are required to be underpinned by a comprehensive safeguarding education programme.

Dealing with a disclosure or concern regarding child abuse, all clubs and leagues involved in affiliated football should have access to procedures which include a flow chart explaining what to do if you have a concern about the welfare of a child. The information should include out-of-hours contact details for the local Duty Social Care Team and the Police.

**Raising a concern about abuse of a child:**

Report to the Designated Safeguarding Officer (DSO) who will take action, they will:

- Seek advice if required
- Report to the Police, Social Care, Local Authority Designated Officer (LADO) or LSCB in line with their policy and procedures (statutory agencies should acknowledge receipt of the referral)
- If the allegation relates to anyone involved in football report this to The FA Safeguarding Team who will acknowledge receipt of the referral
- Record actions taken
- Follow the advice and guidance of the statutory agencies
- Grassroots football to follow the guidance of The FA
- Professional football to liaise with The FA Safeguarding Team to agree actions to be taken
- Work collaboratively to ensure actions and safeguards are effective across football and information is shared appropriately in line with statutory guidance and legal responsibilities
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A referral is made by completing an ‘Affiliated Football Referral Form’ and sending it to The FA Safeguarding Team or County FA depending on level of risk assessed. Referrals can be made over the phone but a written referral must be sent within 24 hours. If the concern is assessed to be high risk the designated safeguarding officer needs to consider which statutory agency should be contacted. To avoid doubt, if a child is in imminent risk of harm the Police need to be contacted immediately. If a referral is made to any statutory agency this information must also be submitted to The FA Safeguarding Team within 24 hours.

The FA Safeguarding Team will give updates to the Designated Safeguarding Officer every eight weeks, if the concern relates to an individual in a paid position and every twelve weeks, if the position is not paid. Updates will include when a case is opened, closed or when there is a change in risk assessment.

The FA’s Safeguarding Team can be contacted on 0844 980 8200 and ask for The FA Safeguarding Case Manager or alternatively the relevant CFA Welfare Officer can be emailed directly or telephoned, for further contact details please refer to http://www.thefa.com/GetIntoFootball/CountyFA/CountyContacts where you will be able to access the website address, as well as a general contact number for all County Football Associations.

Strategy meetings
When a Strategy Meeting is held, The FA Safeguarding Team is usually represented by the County FA Welfare Officer. If the participant being investigated is employed by a professional club, The FA Safeguarding Team and the relevant Designated Safeguarding Officer within the professional game will discuss who attends the Strategy Meeting.

Suspensions
When The FA suspends a participant The FA Safeguarding Team will notify the relevant Designated Safeguarding Officer of the suspension. This notification will be via a copy of the suspension letter sent to the participant.

For further detail of The FA process of investigation and decision making (including the appeals process) please refer to The FAs Safeguarding Rules and Regulations available on www.TheFA.com.
Dealing with poor practice concerns

Affiliated football takes poor practice seriously. All cases should be dealt with in line with the relevant football bodies disciplinary process and their safeguarding policies. Grassroots clubs or members of the public need to advise their local County FA of any concerns. Professional clubs need to send a referral to The FA Safeguarding Team where repeated poor practice incidents occur. To avoid doubt a referral needs to be made where there are three incidents of poor practice by the same individual. This is whether these incidents are for the same type of poor practice, or for different forms of poor practice, so that there is some FA support for County FA’s and clubs, and oversight of the thresholds for poor practice cases being managed locally.

Poor practice is defined as follows:
• When 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 and criticizes players who make a mistake during a match)
• Allowing hazing practices to go unreported
• Placing children or young people in potentially compromising and uncomfortable situations with adults (e.g. inappropriate use by a coach of social media with a young player(s))
• Ignoring health and safety guidelines (e.g. allowing young players to set up goal posts unsupervised by adults)
• Failing to adhere to the club’s codes of practice (e.g. openly verbally abusing the referee)
• Giving continued and unnecessary preferential treatment to individuals

(Please note – this list is not exhaustive)

The judgement about whether an incident is one of child abuse or poor practice 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 grassroots or professional club or alternatively with support and guidance from the Premier League or Football League as appropriate or the County FA.

Working together to make a difference for football

Affiliated football is committed to safeguarding children and young people at all levels of the game. This overarching policy represents the intentions and commitment of affiliated football. Our policy clarifies what is expected of everyone involved in working or volunteering with children and young people in affiliated football.

Glossary

Affiliated Football: refers to those football organisations who have affiliated to the National Governing Body - The Football Association and in so doing adhere to the Rules and Regulations of the Association

Designated Safeguarding Officer: is an umbrella term used to describe the role allocated in affiliated football to take responsibility for managing safeguarding requirements in football in line with Government guidance and legislation.

Open Age Football: involves players who are aged 16 years or older to play competitively.

Parent/Carer/Legal Guardian: these terms are used interchangeably to describe the adult who has the legal responsibility for the care and welfare of children.

Social Care Departments: are the local authority departments responsible for discharging their legal obligations in respect of safeguarding, they are also known as Children’s Services/Children’s Social Care

U18s: anyone who is under 18 years of age is defined in law as still being a child and as such is protected by and must adhere to legislation relevant to children

Workforce/Staff /Volunteers: these terms are used interchangeably to describe people who have taken on roles in football, they may be paid or volunteers

Youth Football: describes a variety of football formats e.g. mini soccer which involve those aged under 18 years of age

Local Authority Designated Officer: LADOs work within Children’s Social Care and are responsible for the procedures for managing allegations against people who work with children.

Local Safeguarding Children Board: Established by the Children Act, 2004, which provides a statutory responsibility to each local authority to have this mechanism in place. LSCB’s provide coordination and cooperation locally to ensure safeguards are effective.
Appendix 1

Criminal Records Checks

Affiliated football is committed to doing all that it can to prevent people who are barred from working with children in regulated activity, from becoming involved in football with U18s. Criminal Records Checks will be used as a part of a responsible recruitment strategy across the game. This requirement is clearly set out in this policy as well as in The FA’s Regulations which govern the game.

Criminal Records Checks will help affiliated football to make informed recruitment decisions about the suitability of people with criminal records who are seeking a role with U18s football. Those who are 16 years of age and above, working or volunteering directly with children and young people in football are required to have a DBS Enhanced Criminal Records Checks. This includes those who are teaching, training, instructing, supervising, giving advice or guidance on wellbeing or caring for children or driving a vehicle solely for children on behalf of a club or football organisation.

Criminal Records Checks should not be carried out on anyone U16 years of age.

In order to have a check, an individual’s involvement needs to be frequent. This is described by the Disclosure and Barring Service (DBS) as - once a week or more, four days or more in one month or overnight.

Those who carry out these roles with children frequently and are unsupervised will need a DBS Enhanced Criminal Records Checks with Children’s Barred List.

The following roles in U18s football should have a DBS Enhanced Criminal Records Checks; with Children’s Barred List:

- Those in designated safeguarding officer roles, providing advice and guidance on well being to children e.g. Club Welfare Officers
- Team Managers, Coaches and Assistants (this includes managers and coaches who are referred to as Assistant Manager’s or Coaches and those who are not formally qualified but are coaching, as well as development staff who carry out eligible tasks with U18s)
- Tutors, Mentors, Assessors, Sport Scientists
- Referees, Referee Mentors, Referee Coaches and Assessors in U18 football and working with U18 referees
- Chaperones, Landladies/Landlords, House Master’s, and Host Families
- Those providing treatment and therapy, including Doctors, Physios and other Health and Care Professionals Council (HCPC) registered roles, (NB First aiders are eligible for Enhanced DBS check depending on frequency, they may be deemed in regulated activity).
- Chaplains and those who carry out this role from all faiths
- Regular Club Drivers.

NB - Ordinarily, Club Chairmen, Treasurers and Secretaries do not require a check, if they are just or mainly administrative roles. However, if the people in these roles also help out frequently with coaching, then they will need a DBS Enhanced Criminal Records Checks with Children’s Barred List in their role as a coach.

Appendix 1

Criminal Records Checks should not be carried out where there is no eligibility.

It’s important to note there is a distinction as defined by the Home Office between a paid employee and a volunteer with regards to the cost of a check. The Home Office define a volunteer as: “Any person engaged in an activity which involves spending time, unpaid (except for travel and other approved out of pocket expenses), which aims to benefit some third party other than or in addition to a close relative”.

The applicant must not benefit directly from the position the Criminal Records Checks application is being submitted for. The applicant must not:
- Receive any payment (except for travel and other approved out of-pocket expenses).
- Be on a work placement.
- Be on a course that requires them to do this job role.
- Be in a trainee position that will lead to a full time role/qualification.

Affiliated football is fair and recognises it has a duty to make sure the information released does not affect the safety of children. Every Disclosure will be assessed individually taking into account the person’s age at the time of the incident; the time expired since the conviction, the way the court dealt with the crime and other relevant information.

To find out more about the requirements on affiliated football to use Disclosures fairly visit www.gov.uk and follow the links to ‘Employing People’ and then ‘Recruiting and Hiring’.

Affiliated Football advocates the use of the online Criminal Records Check application process, as it provides quicker, cheaper checks.

Most people involved in ‘Affiliated Football’ will be required to complete their Criminal Records Checks via The FA Criminal Records Body, those involved with the Premier League and or its registered clubs should seek further information from their Designated Safeguarding Officer.

It should be noted that the Police will use the following definitions when assessing the relevance of information to be released via the Criminal Records Checks:
- Child Workforce; for any position that involves working/volunteering with children
- Adult Workforce; for any position that involves working/volunteering with adults
- Child and Adult Workforce; for any position that involves Working/volunteering with both children and adults
- Other Workforce; for any position that does not involve working/volunteering with Children or Adults e.g. security guard

Single Disclosure (Applicant Only)

As of the 17th June 2013, the registered Body no longer receives a copy of applicants Disclosures. Individuals will now be able to challenge the information the DBS releases, before it is seen by their current or prospective employer.
Affiliated football will need to obtain the Disclosures with content in order to risk assess individuals in relation to their suitability to work with children in football.

The FA’s Criminal Records Body, or the Premier League and or its registered clubs will contact the individual’s directly, to request the Disclosure certificate as and when this is required. The applicant’s compliance will enable affiliated football to carry out a risk assessment on their suitability to work with vulnerable persons in football.

In order for The FA to manage any potential risk, if applicants’ do not provide the Disclosure within the timeframe it is required, then the applicant will be suspended for non-compliance by The FA, from all football. The Safeguarding Children and Vulnerable Adult Regulations enable suspensions for non-compliance. For further information on The FA’s Criminal Records Checks, including frequently asked questions, go to: http://www.thefa.com/football-rules-governance/safeguarding/the-right-people—recruitment-crc

As of the 17th June 2013, the DBS launched the Update Service. Anyone who applies for Criminal Records Checks from 17 June 2013 can subscribe to the DBS Update Service. Affiliated football is committed to using the online Update Service. This is free for volunteers, but carries a fee for non volunteers. For information on the administration charges within affiliated football refer to the relevant body e.g. The FA Criminal Records Body or the Premier League and or its clubs.

Affiliated football sees the potential benefits of the scheme, as well as recognising that there are some limitations with it.

It is an individual’s choice if they wish to apply to the scheme. There are specific criteria to follow therefore to make a Criminal Records Check ‘portable’ individuals will be required to make a new application and subscribe to the new service via www.gov.uk within 14 days.
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Affiliated football working in partnership with the NSPCC, to provide 24 hour, confidential support to those who need it via:
LET’S MAKE FOOTBALL SAFE — NOT SORRY