



Safeguarding Children and Young People Policy and Procedures.

Brighton & Hove Albion FC // Brighton & Hove Albion Women's FC // Albion in the Community

January 2022



Introduction to the policy

Brighton & Hove Albion Football Club (BHAFC / 'the club') is committed to safeguarding and ensuring the protection of children and young people. The club fully accepts its responsibility for children and young people and our aim is to ensure that safeguarding runs through every element of the club's work to ensure the welfare and well-being of all children and young people who engage in activities.

Where the policy refers to 'the club' this also includes Brighton & Hove Albion Women's Football Club (BHAWFC) and Albion in the Community (AITC).

All children and young people have a right to be protected from abuse regardless of the presence of any protected characteristics listed by the Equality Act 2010; age, disability, gender assignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

We believe that all adults working within the club, in any capacity, have a duty and responsibility to safeguard the welfare of children and young people. We strive to do this by applying policy, procedures and best practice to promote the safety and welfare of children and young people who engage in activities with the club. This allows them to enjoy any club activity in a safe, inclusive and child-centred environment.

We believe that everyone who comes into contact with children and families has a role to play in ensuring a child's welfare. Adults who work with children and young people are placed in a position of trust that carries authority, status, power and, most importantly, responsibility. We strive that all adults involved with children be positive role models who display high moral and ethical standards.

The safeguarding of children and young people is extremely important to all at the club. We recognise that parents and carers often place trust in us to take care of their children; whether at a Young Seagulls activity or attending a game at the stadium. As such, we embrace the legal and moral responsibilities we hold for the safety and welfare of children.

The club's Children and Young People Safeguarding Policy and Procedures meet the requirements of:

- The Children Act 1989 & 2004.
- Working Together to Safeguard Children 2018.
- Working Together to Safeguard Football 2014.
- The FA Premier League Rules.
- The FA Charter Standard Safeguarding Policy and Procedures.

Further, this policy considers the recommendations set out in The International Safeguards for Children in Sport 2016.

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 AITC Board of Trustees.

See also Appendix 6 for details of legislation which underpins this policy and these procedures.

Scope

This policy applies to all those working with children and young people for or on behalf of the club, including permanent, casual, volunteers and contractors regardless of their role.

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 and young people 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 and young people will be supported by safeguarding training to ensure staff are able to understand and discharge their Safeguarding responsibilities.

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.
- BHAWFC First Team and Reserve Team training.
- Stewarding and all other matchday activities.
- Stadium tours, children's birthday parties.
- Seagulls Superstore.
- Young Seagulls activities.
- Albion in the Community programmes and activities.

The American Express Elite Football Performance Centre and other venues:

- First Team training, Academy matches and training.
- Women and Girls' Regional Talent Centre and development squad training.
- Educational provision for Academy school boys and scholars.
- Albion in the Community programmes and activities.

Definitions

Under the Children Act 1989, **a child or young person** is defined as anyone up to their 18th Birthday (Children Act 1989).

Under the guidance in Working Together to Safeguard Children 2018, **safeguarding and promoting the welfare of children** is defined as:

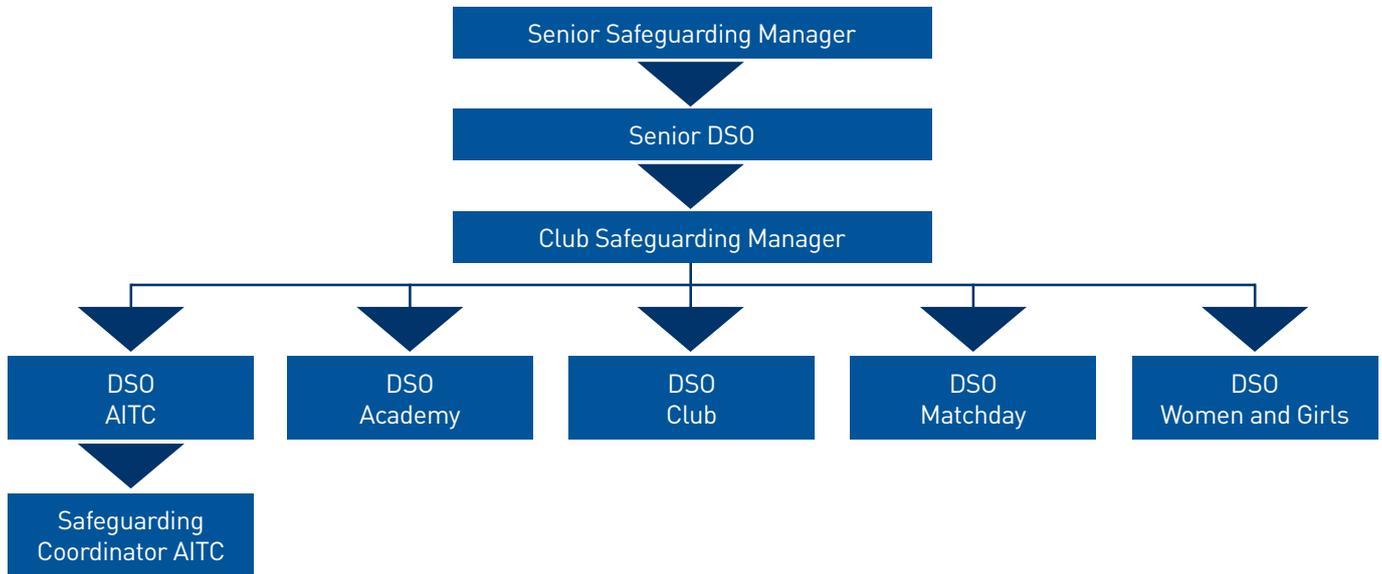
- Protecting children from maltreatment.
- Preventing impairment of children's health and development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable children to have the best outcomes.

Safeguarding framework

The club's comprehensive framework for ensuring the protection of children and young people includes:

Roles and responsibilities

It should be noted that all employees of the club have a responsibility for the welfare of children and young people who engage in any club activity; however, there are also more specific roles who have specified duties in relation to safeguarding.



Senior Safeguarding Manager

There is one Senior Safeguarding Manager at the club. Chief Executive and Deputy Chairman, Paul Barber.

Senior Safeguarding Lead

Richard Valder-Davis is the Senior Safeguarding Lead and it is his role to provide club-wide strategic leadership and management in order to assist with the safeguarding strategy of the club. This role is responsible for ensuring all safeguarding concerns from all areas of the club are recorded correctly, reported to a Senior Safeguarding Manager and referred to the appropriate statutory agency.

All safeguarding concerns or disclosures will be referred to the Senior Safeguarding Lead who will decide the appropriate action to take in light of the nature and seriousness of the concern.

Where appropriate, the Senior Safeguarding Lead will ensure the necessary referrals to the relevant statutory agencies, the FA Case Management Unit and the Premier League Safeguarding Team are made.

Please see Appendix 2 for a detailed description of the roles and responsibilities of the role.

Senior Designated Safeguarding Officer

Rose Read is the Senior Designated Safeguarding Officer. Her role is to assist and support the Designated Safeguarding Officers in every department and to deputise for the Senior Safeguarding Lead.

Designated Safeguarding Officers (DSO)

There is a DSO within each business area of the club. Their role is to provide support and refer all issues upwards to the club Safeguarding Manager and the Senior Designated Safeguarding Officer. The relevant DSO will most often be your first point of

contract for any safeguarding concerns or disclosures that arise. Appendix 2 provides a more detailed breakdown of the duties and responsibilities of the role.

- The DSO for BHAFC is Rose Read.
- The DSO for Academy is Joss Albert.
- The DSO for AITC is Matt Dorn.
- The DSO for Matchdays is Adrian Morris.
- The DSO for Training Ground/Women and Girls' Football is Joss Albert.

Safeguarding Coordinator

The Safeguarding Coordinator role is a full-time role working alongside the DSO and Senior Safeguarding Lead to provide Safeguarding support to operational staff within the designated area of the club.

Departmental Safeguarding Champions SCs

SCs will act as safeguarding champions and can provide advice to colleagues who have safeguarding concerns and how to report them correctly.

Any employee occupying the above roles will have been issued with a detailed role description that sets out the responsibilities of the role and be supported as part of the Safeguarding Champion network.

Safeguarding Trustee

AITC has a dedicated Safeguarding Trustee. This role is to provide AITC Safeguarding oversight and accountability on the board of trustees. The Safeguarding trustee will receive Safeguarding updates from the Safeguarding Coordinator and the AITC DSO.

Any employee occupying the above roles will have been issued with a detailed role description that sets out the responsibilities of the role.

Please see Appendix 5 for the contact details for all relevant safeguarding persons within the club and for some external contacts that may be of help if you have a safeguarding concern.

Recruitment and Disclosure for Staff, contractors, agents and volunteers

The club recognises the importance of safe recruitment and has taken into account the government guidance in Keeping Children Safe in Education 2020 and the FA's Responsible Recruitment guidelines to ensure there is a safe and responsible recruitment process for all individuals within the club who come into contact with children and young people.

This applies whether in a paid or voluntary capacity.

The club has a duty to ensure that any third parties working with children including but not limited to supply teachers, interpreters and mental health professionals will also have completed a safer recruitment process equivalent to the club's.

The club's safe recruitment process includes:

- Ensuring job descriptions and job advertisements highlight the key responsibilities of the role and the club's commitment to safeguarding.
- Applications must be made by the candidate and not an agent; the club will then shortlist and interview as appropriate for the role. Each candidate will be interviewed by two members of staff prior to any offer and interviews will include exploration of candidates' attitudes and approaches towards safeguarding.
- Ensuring all applicants identity, qualifications and experience are verified through original documentation and any gaps in CVs will be properly explored.
- All roles or positions will require satisfactory references and criminal record checks under the Disclosure & Barring Service (DBS) appropriate to the role concerned and in line with The Rehabilitation of Offenders Act 1974; Guidance for roles should be assessed in line with government guidance **DBS checks in sport for staff working with Adults** and **DBS checks in sport for staff working with Children**.

- The club will abide by the FA's guidance on roles which fall within a regulated activity and therefore need an enhanced DBS. It will also follow affiliated football guidance on roles that, although outside the regulated activity definition, still warrant enhanced or standard DBS checks and roles where a basic check will satisfactorily serve the club's safeguarding policy.
- Those working with children will need two written references including an express request of details of any safeguarding matters recording by previous employers to ensure the fulfilment of the club's commitment to the ongoing safeguarding of children.
- A person may commence work prior to the background checks and references being returned but such person will be supervised at all times while working with children until such time that all background checks and references are completed and deemed to be acceptable by the club.
- Ensuring all staff complete a probationary period.

The club also requires all agency staff and consultants working with children to sign a self-declaration form. This requires employees to declare any criminal history they may have. Consultants and agency staff who undertake a regulated activity with children must have a valid enhanced DBS. This will need to be verified through the DBS number and date of issue.

If a person's criminal record check reveals cautions, convictions, community resolutions, warnings or final reprimands, the club will consider the nature of the offence/offences in deciding if the person is unsuitable for working with children and young people. The club will conduct a risk assessment to evaluate the information and the person may be required to attend a risk assessment meeting with the relevant Designated Safeguarding Officer (DSO) prior to any recruitment decision being made.

Participants with criminal records

Child Protection in Sport Unit (NSPCC) has produced guidance in this area which should be referred to if needed:

Making safe and fair decisions about membership for people with criminal records.

1. Being a participant or fan is not exempt from The Rehabilitation of Offenders Act, meaning it is unlawful to refuse or withdraw membership or to prejudice a participant or fan in any way when a caution or conviction has been spent.
2. While there is no requirement to perform checks on all participants and fans, there are occasions when a criminal background may come to light including, word of mouth, newspaper or online reporting, through the police or statutory agency or self-disclosure.
3. Following information coming to light, the club will establish whether the conviction is unspent. This can be achieved through a self-declaration form or a face to face meeting.
4. The club may also request a Basic disclosure from the individual if confirmation of the conviction is required.
5. Following confirmation of an unspent offence the club may carry out a Safeguarding risk assessment based on the activity being attended. Following the risk assessment, a decision will be made about the terms of participation.
6. In the event that a spent conviction comes to light, Safeguarding should be at the heart of any decision and any breaches of current Code of Conduct or current behaviours falling short of club values should be dealt with through normal disciplinary procedures, taking no account of the spent conviction.

Induction and training

During the induction process, all staff who come into contact with children and young people as part of their role, will have mandatory in-house training on identifying and reporting concerns in respect of safeguarding. This training will also incorporate the Premier League guidance for safer working practice. Employees will also receive copies of this policy and procedures, along with other club policies, and must sign that they have read and agreed the contents. A refresher safeguarding course will be provided every three years or earlier if required.

The training will also include an overview of this policy with specific emphasis on:

- The principles and obligation to safeguard within a sporting environment.
- An understanding of the signs and symptoms of abuse (sexual, physical, emotional, neglect, grooming, online, peer-on-peer and radicalisation).
- Practical advice regarding safeguarding practicalities in your role.
- Dealing with a disclosure.
- How to report a safeguarding concern.

- The impact of holding a position of trust and examples of good and bad practice.
- The safeguarding structure at the club.
- Safeguarding the safeguarder.

Safeguarding updates in line with current local and national safeguarding trends and priorities will be provided as part of the club's ongoing commitment to ensure the protection and welfare of children.

The Senior Safeguarding Lead will attend mandatory Premier League safeguarding training for senior managers at least every two years.

The Designated Safeguarding Officers will attend mandatory safeguarding training delivered by the Brighton & Hove Safeguarding Children's Partnership.

Records of attendance, content and changes to all training will be kept and made available to legitimate parties on request. This includes where, due to the nature of a role, a person is required to attend external training course.

A rolling training programme is delivered to Safeguarding Champions.

Abuse

Child abuse is defined as the maltreatment of a child. Abuse or neglect can be somebody directly inflicting harm on a child, but it can equally arise by failing to act to prevent the harm of the child. Child abuse can arise in various settings including in the family home, institutional or community settings or via the internet. It can be perpetrated by an adult, or another child, known or unknown to the victim.

The main areas of abuse are physical, emotional, neglect and sexual mistreatment. Other areas of abuse include child sexual exploitation, peer on peer abuse, female genital mutilation, youth produced sexual imagery and radicalisation. All of which can present themselves in very different manners, so it is imperative to be aware of the signs of abuse. Further detailed information about the definitions and physical and behavioural signs of different types of abuse can be found in Appendix 1.

Additional vulnerabilities

It is important to be aware that children who have additional vulnerabilities may be more susceptible to abuse. Therefore, such children may need further safeguards in place to reduce the potential risk of abuse and neglect. Working Together to Safeguard Children 2018 provides useful guidance on children and young people who may be particularly vulnerable to abuse, for example if:

- The child is disabled and has specific additional needs.
- The child is a young carer.
- The child is at risk of being radicalised or exploited. The club has a responsibility to fulfil its duty in line with the government Prevent programme to recognise and respond to any risk or signs of radicalisation. The club will do this by:
 1. Prevent being included on the club's risk register as a standalone risk.
 2. Have in place a monitoring system which will indicate through 'key word' filters when networks are accessing inappropriate content.
 3. Staff will receive blended training to educate on the signs and indicators of radicalisation.
 4. Any concerns staff or children may have in relation to radicalisation will be reported in line with all other abuse types outlined in this policy.
 5. The further referral of radicalisation concerns will be made appropriately to the relevant authorities and Police forces.
- The child is in a family circumstance presenting challenges for the child, such as domestic violence, adult mental health issues or drug/alcohol abuse by the parents.
- The child is a looked-after child or has recently returned home after being in care.
- The child frequently goes missing from home.
- Any child who is educated in the home environment is less visible to staff and those there to keep them safe and supported.

This is not an exhaustive list.

The best way to ensure that children or young people with additional vulnerabilities are better protected is by fostering an environment whereby the children or young people are helped in protecting themselves and feel able to raise concerns about their safety.

Definitions of good practice and poor practice

Good practice

All employees, workers, consultants, agency staff and volunteers working with children or young people should adhere to the following principles when undertaking their work:

- Be a role model, displaying consistently high standards of behaviour and appearance (disciplined/committed/time keeping).
- Always use language that is child appropriate and socially acceptable.
- Always work in an open environment. You should avoid unnecessary private situations and discourage secrets and/or closed communications.
- Make the experience of the sporting activity fun and enjoyable for all involved. In doing this, you should promote fairness and confront and manage any bullying.
- Treat all children and young people equally and with respect and dignity.
- Always put the welfare of the child or young person first.
- Avoid unnecessary physical contact and maintain a safe and appropriate distance with children and young people.
- Where any form of manual/physical support is required it should be provided in an open environment and with the consent of the child or young person. Physical contact can be appropriate and, sometimes a necessary part of training. However, it must be neither intrusive nor disturbing and the child or young person's consent must be obtained prior to the contact.
- Where supervising groups of children or young people in changing rooms, always ensure staff members work in pairs.
- Written parental consent is required if club officials are required to transport children and young people or for any significant travel arrangements e.g. tours/overnight stays.
- There must always be a qualified first aider present or readily available.
- While at away events, adults should not unnecessarily enter a child or young person's room and they should never invite children or young people into their own room.
- When providing feedback to children and young people, make sure it is constructive and encouraging as opposed to negative criticism.
- Where the club acts in loco parentis, secure written consent from parents and guardians for the administration of emergency medical treatment and first aid.
- Ensure that a written record is kept of any incidents or injuries that occur. This record should include details of the incident, any action taken and any treatment given.
- Ensure all communication with persons under 18 is conducted with parental consent. Any text messages or social media contact with children or young people must be for the sole purpose of facilitating arrangements and should always be made using the business mobile telephone provided. It is better practice to jointly communicate with the parent or guardian and child.

Poor practice

The following are regarded as poor practice when working with children and all employees, workers, agency staff, volunteers must avoid such behaviour:

- Taking insufficient care to avoid injuries. For example, by excessive training or inappropriate training for the age, maturity, experience and ability of players.
- Allowing abusive or concerning practices, allegations or disclosures to go unreported or not acted upon. If you have reported the matter to the relevant person within the club and it has not been dealt with correctly, consult the procedures in this document.
- Spending unnecessary amounts of time alone with children and young people away from others.
- Being alone in changing rooms, toilet facilities or showers used by children and young people.
- Taking a child or young person alone in a car unless written consent has been obtained from the Safeguarding Team in an

emergency situation.

- Taking children or young people to your home or any location where they will be alone with you.
- Sharing a room with a child or young person if at an overnight stay or tour.
- Engaging in rough, physical or sexually provocative games of any type, even those which you may consider to be simply 'horseplay' or 'banter'. This is never appropriate and should be avoided.
- Encouraging, allow or engage in inappropriate touching of any form.
- Placing children 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 or action without being challenged or corrected, for example hazing or bullying.
- Making sexually suggestive comments to a child or young person.
- Doing things of a personal nature that the child or young person can do for themselves.
- Ignoring health and safety guidelines as this will subject children to unnecessary risks. (e.g. allowing young players to set up goalposts unsupervised by adults).
- Giving continued and unnecessary preferential treatment to individuals.

Please note that both lists are not exhaustive but merely providing examples of the types of behaviour you should promote or avoid respectively.

Whistleblowing and complaints

The club recognises the risk of things going wrong or unknowingly harbouring poor practice and believes it has a duty to identify such situations and implement measures mitigate such risks. As such, the club encourages a culture of openness and one of prevention rather than simply cure.

If you feel there is a requirement to whistleblow, you should first consult your line manager. If the matter concerns the line manager, they should contact the next in line senior manager.

The full Whistleblowing Policy can be found in the club's staff handbook. If unable to raise concerns internally, please consult the NSPCC Whistleblowing Helpline on 0800 028 0285.

The Academy and AITC have formal complaints procedures which can be accessed via the club's and AITC's websites.

Lost or missing children and young people

Every effort must be made to ensure children and young people remain either with their parents, carers or activity leaders. However, should a child or young person become lost or go missing while engaging with a club activity, the club will make every effort to locate the child as quickly as possible.

If the child or young person is not located within a reasonable amount of time, the club will contact the child's parents or carers and agree with them to contact the police. If the parents or carers are not available, the club will call the police directly.

A record will be kept by the Safeguarding Team of any instances in which a child or young person goes missing while engaging in club activities including any action taken by the club and the eventual outcome.

Searching children and young people

In order to ensure the safety and security of all club activities, it may be that a child or young person is subjected to the club's search process. In such instances, the preferred approach is that children and young people self-search under the supervision of the steward or security member. However, if concerns remain that the child or young person is concealing an item then consent will be sought from the parent or carer before the steward or security member conducts a search on the child while a supervisor observes.

Risk assessments

Risk assessments will always be completed for club activities. This is to minimise and prevent risks to children and young people. Such risk assessments will take into account the particular vulnerabilities or increases risks that may occur when a child is partaking in a club activity.

Examples of where risk assessments are required:

- Trips and tours.
- Transport.
- Changing area.
- Host family provision.

Supervision

The club adheres to the best practice guidance provided by the FA in relation to the supervision of children and young people when engaging in club activities. The club also recognises that the appropriate supervision can depend on the particular activity or children attending. For example, age of children attending or location of the activity.

Use of photography and film

The club takes guidance on the use of images from the guidelines issued by the FA and the EFL. Club officials who take images will have been briefed by a member of the Safeguarding Team or by the Media and Communications Team. Prior to any images being taken of children, consent will be sought from parents and carers at the start of the season each year.

Parents and carers are responsible for informing the club of any change of circumstances within the season which may affect consent.

Parents and 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 the positive benefits of the use of social media. However, it is also aware of the potential safeguarding risks of children and young people in engaging with social media platforms.

Social media is dealt with in full in the club's social media policy.

Staff should not add, befriend or follow any child under 18 who is a player or participant.

Sharing information

The club is committed to the sharing of information to protect children, in line with Working Together 2018, the Data Protection Act 1998 and General Data Protection Act 2018.

The club will promote the 'seven golden rules' set out by the government in their guidance (Information Sharing Advice for Practitioners Providing Safeguarding Services to Children Young People, Parents and Carers):

1. Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.

3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up to date, is shared in a timely fashion, and is shared securely.
7. Keep a record of your decision and the reasons for it –whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

In line with the updated KCSIE September 2021 document the club will work with local authorities and encourage sharing of information about when a child has a social worker. The objective when this information is shared with the club, is to use it to support both education and overall wellbeing of the child's when in the club's care.

Referrals and confidentiality

Where a safeguarding concern about a child or young person arises, the club may refer these concerns to the FA, statutory, external agencies and other football clubs where a trusted Safeguarding professional can be identified.

Referrals onto third parties will be made when the ongoing risk to a person requires information to be shared to enable the risk to be managed effectively.

Every effort will be made to ensure confidentiality is maintained for all concerned. Any information that is shared will be done so on a strictly need to know basis. This includes:

- The relevant person in the Club Safeguarding Team.
- The parent or carer of the child or young person who is alleged to have been abused.
- The person who made the allegation.
- If appropriate, statutory agencies, such as the police or children's social services.
- If appropriate, external agencies, such as the FA and the Premier League.

Recording of Safeguarding concerns

Safeguarding will result in records being made of concerns. A record of the steps taken to manage concerns as well as record of the outcomes will be made.

The Information Commissioners Office 2020 makes it clear that the handling of data containing personal information should be:

- Adequate, relevant and not excessive for the purpose for which they are held.
- Accurate and up to date.
- Only kept for as long as is necessary.

To ensure that any records being made are in line with the General Data Protection Regulation (GDPR) the club will ensure:

- Records are made for reasons of ongoing Safeguarding reasons only.
- Retain records for only as long as necessary to ensure that Safeguarding of children can occur effectively.
- Destroy records when they are no longer necessary.
- Record Safeguarding information in a secure online space which keeps records confidentially and securely in a separate file for each child.

Recording concerns about adult behaviour

Sometimes concerns might be raised about an adult who works or volunteers with children. This could be because they have:

- Behaved in a way that has harmed, or may have harmed, a child.
- Committed a criminal offence against, or related to, a child.
- Behaved in a way that indicated they are unsuitable to work with young people.

If concerns have been raised about an adult's behaviour around children, the records should keep in their personnel file either until they reach the age of 65 or for 10 years – whichever is longer (IRMS, 2016; Department for Education (DfE), 2020).

This applies to volunteers and paid staff. For example: if someone is 60 when the investigation into the allegation is concluded, keep the records until their 70th birthday if someone is 30 when the investigation into the allegation is concluded, keep the records until they are aged 65.

Information should be kept for this length of time even if the person stops working or volunteering for the organisation.

Records relating to concerns about an adult's behaviour should be kept in the person's confidential personnel file (not in a central 'concerns log') and a copy should be given to the individual.

Retention periods for child related records

Information relating to Child protection concerns involving participants of the club will be kept until the child is 25 years old.

Safeguarding information recorded to enable the safeguarding of a child should be kept until the child leaves the club ensuring that appropriate information sharing is completed.

Support for employees

The club recognises that it can be deeply upsetting when a child or young person discloses that they have suffered abuse. The club has support structures in place to help employees who have received a disclosure or who are being asked to participate in an investigation into poor practice or abuse. If you need further advice regarding this, contact the People & Culture team or the Senior Safeguarding Lead.

Empower children to be heard

Across all areas of the club there is ongoing commitment to ensure that children continually have their voices, opinions and concerns heard.

The club acknowledge and understand that a child's involvement in elite sport can be a reason a child may not feel comfortable or confident to speak out if there is a problem.

To ensure children have the confidence to speak out about concerns, the club should always seek the views and opinions of children on topics which involve them, this should include policies, staff recruitment and changes to facilities. Participant forums across the club will enable children to have their thoughts and opinions heard.

Mental Health

The club is committed to the mental wellbeing of all players and staff.

The club employs a full time Head of Performance Psychology and a Mental Wellbeing Manager.

Multi-Disciplinary Wellbeing forums across the organisation take place to identify Wellbeing as well as Safeguarding concerns.

Safeguarding and Wellbeing teams actively work together to manage identified concerns in line with this policy.

Review

The club will review this policy to ensure ongoing compliance with safeguarding requirements. This will occur annually, at the end of every season, or whenever there is a change in legislation, guidance, governing body rules or major safeguarding incident.

Procedures

Consent

The primary concern in safeguarding should always be the safety and welfare of the child or young person. However, it is best practice to obtain the consent of the child concerned prior to making an external referral. Nevertheless, there are several circumstances where a referral can be made without the consent of the child. These include:

- Where the child or young person is at risk of harm.
- Other people are or may be at risk of harm.
- A serious crime has been committed or by sharing the information the crime can be prevented.
- The child concerned does not have the mental capacity to make the decision to consent to the referral.
- Sharing the information with the emergency services if it is an emergency or life-threatening situation.
- An employee, consultant, volunteer, worker or agency staff is implicated.
- The risk of harm meets the threshold for a multi-agency statutory meeting.

What action should you take if you suspect abuse or poor practice has occurred?

You cannot assume that someone else will act to help the child or young person as everyone holds the safeguarding responsibility.

- You must act if you have a concern about the safety and/or welfare of a child or young person.
- You must act if you have a concern about someone's behaviour towards a child or young person.

In the event of the above, you should report your concerns to one of the following:

- A Designated Safeguarding Officer.
- Safeguarding Coordinator.
- Club Senior Safeguarding Lead.

Appendix 7 provides flowcharts detailing the actions that should be taken.

What action should you take if you receive a safeguarding disclosure from a child or young person?

If a child informs you directly about their concerns about someone's behaviour towards them, this is a disclosure. This is often very difficult for a child to make, and children or young people who may be vulnerable are likely to disclose abuse to an adult they trust. It is extremely important that you know how to correctly respond to a disclosure.

Step 1

Ensure that you deal with the disclosure as it happens and make sure the immediate needs of the child are met and they feel supported. It is not your role to investigate the disclosure when it is made. Instead, it must always be taken seriously and dealt with in accordance with the club's guidance in this policy. This is the case even if the truth of the disclosure has not been verified. Your role in this situation is only to act in the best interests of the child or young person who may be at risk.

In order to do this, you should:

- Put aside your own feelings and emotions and listen calmly, even if the information is upsetting or shocking.
- Allow the child to speak freely and try not to interrupt them as this may disrupt the discussion and lead them to feel like they are being interrogated.
- Do not worry if there are silences, let the child speak at their own pace and lead the discussion.
- Do not challenge any of the information disclosed by the child.
- Try to avoid any accusatory or leading questions, let the child tell their own story of events without pushing any information. Do not ask any questions that may make the child feel guilty or ashamed.
- Tell the child that you recognise how difficult the disclosure may be to them and reassure them that they are doing the right thing and you are taking it seriously.
- If physical abuse has taken place, you may observe any visible marks or bruises, but do not ask a child to remove or adjust clothing in order to observe them.
- Tell the child who you will be informing of the disclosure while emphasising that you will support them through the process.
- Respect the confidentiality of the disclosure by only informing those who need to know. Those who need to know are the people who have a role to play in protecting the child.

You should not:

- Document or record the conversation while the child is disclosing. This should be done straight away after using the referral form at Appendix 3; remember, as accurately as you can, the words and phrases used by the child to describe what has happened.
- Pass any judgment on what was said or give them impression that you may blame the child.
- Make false promises or promises you may not be able to fulfil to the child. For example, a promise that you will not tell anyone.
- Investigate, avenge or approach the abuser yourself.

Always keep in mind that when a child or younger person discloses they may feel:

Guilt: It is possible they will blame themselves for the abuse and feel guilty about disclosing.

Ashamed: They may feel ashamed about the abuse itself or what their friends and family may think.

Confused: They may be confused about their feelings for the alleged abuser as it could be someone they look up to and trust.

Scared: They may be fearful of the repercussions of disclosing the abuse or of the alleged abuse.

Step 2

Following the disclosure, if there is an immediate risk of harm, you must call the police to protect the welfare of the child.

As soon as you have ensured the immediate safety and comfort of the child or young person, you must inform a Designated Safeguarding Officer. Their contact details can be found at Appendix 5.

The Senior Safeguarding Lead will contact the appropriate statutory agencies on behalf of the club.

If you are unable to contact the Senior Safeguarding Lead, there are other useful contacts at Appendix 5 who can provide you with advice. If you were unable to contact the Senior Safeguarding Lead, please inform them of what action was taken as soon as practicably possible.

Step 3

Please use the referral form (Appendix 3) as soon as possible after the disclosure possible following the disclosure. To prevent you missing important details disclosed by the child, it may be helpful to make notes immediately following the disclosure to then wherever possible, you must record information as it was told to you using the language of the child or young person rather than your own interpretation of it.

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

The completed referral form must be passed immediately to the Club Safeguarding Manager (digitally if possible) at: **richard.valder-davis@bhafc.co.uk**. Any original documentation must be passed to the Senior Safeguarding Lead to be stored securely.

What happens next?

You should be informed by the Designated Safeguarding Officer or the Senior Safeguarding Lead what has happened following the report. If you do not receive this information, you should be proactive in seeking it out because it is everyone's responsibility to ensure that concerns are followed up.

If you have a concern that the disclosure has not been appropriately acted upon, you can inform the Senior Safeguarding Manager. The contact details can be found at Appendix 5. Ultimately, if you still have concerns, you should contact statutory authorities.

What action should you take where you suspect abuse but there has been no disclosure?

Sometimes a child being abused will not feel able to make a disclosure. It is therefore important to be alert to signs of abuse discussed earlier in this policy. It is still crucial that you raise a concern where something has happened to make you aware of the possibility of a safeguarding issue. For example, an adult or child may say something about themselves or another child that may alert you to a possible abusive situation. Alternatively, you may hear or witness something that gives cause for a safeguarding concern. In such situations, it is still imperative to act.

Raising a concern

Where you have a concern, but no disclosure, about any form of safeguarding poor practice or abuse, there may not be firm evidence of abuse prior to you raising a concern. When raising a concern, it is important to give as much information as possible and fully explain what exactly has caused you to hold the concern.

First, you should raise the concern with the relevant DSO who will then raise it with the Safeguarding Team. They will decide the appropriate action in light of the information you have given them.

If you feel unable to raise the concern with the DSO for whatever reason, you can raise it with the Club Senior Safeguarding Lead.

Following this, if you still think there is a concern, or if you feel the matter is so serious that you are unable to discuss it with the above, you should contact the Head of Safeguarding at the Premier League, Front Door for Families or Police – whose details can be found in Appendix 5.

What happens where an allegation is made against employees, workers, consultants, agency staff and volunteers?

If an allegation is made against someone who works within the club, there are three types of investigation that may occur. They are not mutually exclusive.

1. A criminal investigation by the police.
2. A child protection investigation by the local authority in a multi-agency approach.
3. A disciplinary or misconduct investigation led by the club; this may also involve the FA depending on the role of the alleged abuser.

No internal investigation will commence until the Senior Designated Safeguarding Officer has consulted the Local Authority Designated Officer (LADO).

The alleged abuser will be legally entitled to anonymity until they are either charged with an offence or they waive their anonymity. All employees involved in an investigation or are privy to such information have a legal duty to maintain confidentiality and only provide information to those that need to know.

The employee, worker, consultant, agency staff or volunteer who the allegation concerns will normally be informed as soon as possible after the result of the initial investigation is known.

If it is subsequently established that the allegation was false or malicious, on the basis of further investigation, a written record will be made of the decision detailing the justification for the decision. The person whom the complaint has been made against will normally be informed and the matter will be closed. Allegations that are found to be false or malicious will be removed from personnel records and not referred to in any reference.

Brighton & Hove Child Safeguarding Partnership procedures state in relation to false allegations:

“Such allegations are rare and may be a strong indicator of abuse which requires further exploration. If an allegation is deliberately invented and demonstrably malicious, the employer, in consultation with the Local Authority Designated Officer, they will refer the matter to Children’s Social Care to determine whether the child is in need of services, or might have been based by others.”

Where a criminal investigation is continued, the person concerned will be suspended on full pay if no reasonable alternative. The reasons and justifications for suspension will be recorded.

In the event that a member of staff is dismissed or resigns in circumstances where they might otherwise have faced dismissal for a safeguarding related reason, the Senior Designated Safeguarding Officer will act in accordance with FA regulations and DBS guidelines and make the necessary referral to the DBS, the FA and the Premier League as appropriate.

What happens where an allegation is made against a child or young person?

Any allegation concerning the abuse of a child or young person perpetrated by another child or young person should be dealt with through this policy and its procedures. If you have safeguarding concerns or a disclosure that a child or young person has committed abuse, then you should report it immediately to the DSO or Senior Safeguarding Lead who will seek advice from the local authority on the matter.

All children involved, whether perpetrator or victim, will be considered as being at risk. A thorough risk assessment of the situation will be conducted with the view to ensuring the safety and best interests of all children involved. Both alleged victim and alleged perpetrator would receive appropriate support. It will also be considered whether the alleged abuser can continue engaging in activities with the club. This will be decided on the probability of risk to others.

Covid-19 and Safeguarding

All activity across the club has seen fundamental change due to Covid-19. These changes to some degree will continue for an undefined period.

Continued commitment to Safeguarding

Throughout this period safeguarding will remain at the forefront of all activity and all routes to report and deal with concerns remain in place. Full time safeguarding staff across the club will remain in place and when activity returns a safeguarding presence through nominated individuals will be in place.

Safe online communication

Communication between club staff and children is taking place and guidance to ensure communication is safe has been produced and shared. This can be found in Appendix 8.

Training and CPD

Training and CPD will continue to be delivered online where possible. This has broadened the opportunity to be delivered to harder to reach cohorts of staff, meaning a larger pool of safeguarding-trained staff across the club.

Wellbeing

During a period where all aspects of health have been challenged, welfare forums across the club are being used to track the wellbeing of children. As return to play approaches children will be screened to ensure staff are aware of matters of significance that have occurred during the Covid-19 period. These may include, bereavement, being witness to domestic violence, isolation. Plans to deal with these matters will be made between the Player Care, Wellbeing and Safeguarding teams.

Return to Play

Safeguarding is a key consideration across all activity when considering returning children to football. All areas of the club have considered safeguarding as a significant area in the planning of returning to activities. Protocols have ensured that appropriate safeguarding support is available so staff, children and other stakeholders remain able to report concerns.

Staff contingency due to illness

In the event that the Senior Safeguarding Lead is unable to perform their role, the Senior Designated Safeguarding Officer will deputise.

Appendix 1 – Signs and indicators of abuse

Child abuse is diagnosed through professional assessment. The table below is intended to detail signs which may indicate a problem; the signs are not exhaustive as abuse can present itself in many different ways. The signs may vary according to the age and understanding of the child.

Category of abuse	Description	Physical signs	Behavioural signs
Physical abuse	Physical abuse involves deliberately hurting a child and possibly causing injuries such as bruises, broken bones, burns or cuts. 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.	Injuries that the child cannot explain or explains unusually; untreated or inadequately; unusual bruising that look like finger and hand marks; cigarette burns; bite marks; frequent fractures; scalds; missing teeth.	A child becomes withdrawn, sad or depressed; aggressive or disruptive behaviour; fear of contact; reluctance to go home; fear of certain adults or of physical contact; lack of confidence and/or low self-esteem.
Emotional abuse	Emotional abuse is the ongoing emotional maltreatment of a child and can involve deliberately trying to scare, humiliate, isolate or ignore a child.	Weight change; lack of growth or development; unexplained speech disorders, self-harm; clothing inappropriate for child's age, gender or culture etc.	Being unable to play; fear of mistakes; fear of telling parents; being withdrawn or anxious; unexplained speech and language difficulties; obsessive behaviour.
Neglect	Neglect is the persistent failure to meet a child's basic physical and/or psychological needs.	Constant hunger; ill-fitting or inappropriate clothes; weight change; untreated conditions; continual minor infections; failure to supply hearing aids, glasses and or inhalers.	Constant tiredness; always being early or late; frequent absences; regularly left alone by parents or carers; stealing; parent or carer not attending or supportive.
Sexual abuse	Sexual abuse is when adults, of either sex, or other children, force or persuade a child to take part in sexual activities. This may involve physical contact including penetrative or non-penetrative acts. It can also include non-contact activities, such as involving children in looking at, or in the production of pornographic material.	Difficulty walking or sitting; pain, itching, bleeding, bruising or discharge to the genital area or anus; urinary infections or sexually transmitted infections; persistent sore throats.	Nightmares or difficulty sleeping; being constantly tired; bed wetting; inappropriate sexual knowledge for their age; exhibiting overly sexualised behaviour; eating disorders;
Bullying / Cyber-bullying	Bullying is behaviour that hurts someone else and can include name calling, hitting, pushing, spreading rumours and threatening or undermining someone. Bullying includes racist and homophobic behaviour. Bullying can be the physical, mental or emotional abuse of a person.	Weight change; unexplained injuries and bruising; stomach and headaches; bed-wetting; disturbed sleep; hair pulled out.	Difficulty making friends; 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 emails.

<p>Child sexual exploitation</p>	<p>Child sexual exploitation is a form of child sexual abuse in which children are sexually exploited for money, power or status. The victim may be sexually exploited even if the sexual activity appears consensual. Child sexual exploitation can also take place through the use of technology.</p>	<p>New secretive friendship groups; being collected and driven to locations such as hotels and campsites; receiving unexplained gifts or money.</p>	<p>Withdrawn and tired; irritable when asked about certain friendship groups; concern around sexual health and contraception; questioning around age of consent and frequently asking questions on behalf of a friend.</p>
<p>Online abuse</p>	<p>Online abuse is any type of abuse that occurs online. This can be through social networking sites, online games or mobile phones. It can include cyberbullying, grooming, sexual abuse or exploitation or emotional abuse.</p>	<p>Reluctant to allow adults or others to view mobile phone or social media content.</p>	<p>Spending much more or much less time online or on their phone; withdrawn or distressed after using the internet; secretive behaviour.</p>
<p>Peer-on-peer abuse</p>	<p>Children and adults at risk can be taken advantage of or harmed by their peers. Peer-on-peer abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between individuals and within relationships (both intimate and non-intimate).</p>	<p>Sexualised behaviour between children which is unusual for their maturity. Indicators can be seen here www.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-tool</p>	<p>Overwhelming attention from one party towards another; a reluctance to share car space, bedrooms, changing rooms, showers, with certain children.</p>
<p>Child Criminal Exploitation (CCE)</p>	<p>The organised criminal distribution of drugs by gangs from the big cities into smaller towns and rural areas using children at risk. Gangs recruit children at risk through deception, intimidation, violence, debt bondage and/or grooming.</p> <p>CCE is a growing issue where gangs target vulnerable children to get them to carry out criminal activity. Children who have been exploited and/or trafficked should be treated as victims rather than suspects.</p> <p>The risk of serious violence is significant where CCE is present Risk factors include:</p> <ul style="list-style-type: none"> • Being male. • Having been frequently absent or permanently excluded from school. • Having experienced childhood trauma. • Having been involved in offending such as theft or robbery. 	<p>Frequent trips to hotels and nights away with strangers; large sums of money coming into and then being paid out of bank accounts; a number of mobile phones; increased watching of drill music videos; sudden appearance of valuable items of clothing.</p>	<p>Withdrawn and lonely; feeling like they owe money and are owned by another person; tired and upset, trapped.</p>

<p>Female genital mutilation (FGM)</p>	<p>Involves procedures that intentionally alter or injure female genital organs for non-medical reasons. The procedure has no medical reason or health benefits for girls and women. It is an illegal practice both in the UK or to take British nationals or permanent residents abroad for FGM whether or not it is lawful in another country.</p>	<p>Pain in genital area; unusual behaviour when undressing or showering; short trips abroad with family members for medical procedures.</p>	<p>Scared and confused with an allegiance to their family.</p>
<p>Radicalisation</p>	<p>Radicalisation can be seen as a two-stage process. The first stage encompasses an attitudinal journey, where a vulnerable individual begins to hold extremist views – vulnerabilities being influenced by background factors (e.g. criminality, troubled family background), experiences and influences (e.g. friends and family), and unmet psychological needs (e.g. for belonging and status). The second stage focuses on behaviours, where extremist views turn into violent actions influenced by social, emotional or experiential factors. Within both stages there are opportunities to proactively and reactively support individuals and families to protect them from the risks of radicalisation.</p>	<p>Isolating themselves from family or friends, talking as if from a script, unwillingness or inability to discuss their views, increased levels of anger, a sudden disrespect towards others, increased secretiveness – especially around use of the internet.</p>	<p>Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. Extremists might target them and tell them they can be part of something special, later brainwashing them into cutting themselves off from their friends and family.</p>

In addition to those listed above, it is important to be aware of the following:

Infatuation

Children 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. Staff should therefore ensure that their own behaviour is above reproach. A member of staff who becomes aware that a child may be infatuated with him/her, or with a colleague, should discuss this at the earliest opportunity with a member of the club’s Safeguarding Team.

Youth-produced sexual imagery (also known as sexting)

This occurs where:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer also under the age of 18.
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult.
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

Making, possessing and distributing any imagery of someone under the age of 18 which is indecent is illegal. The club’s response to such incidents will be guided by the welfare and protection of the children involved and proportionality.

Any concern should be reported to the DSO in the normal way who will report and discuss the with the Senior Designated Safeguarding Officer. The context of the situation in which the imagery was shared will determine the action taken by the

Safeguarding Team. Where there are aggravating factors, such as no consent for the images or malicious intent by the person sharing, the matter will generally be referred to the police and/or children's social services.

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 abuse

Domestic abuse 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 abuse. Domestic abuse can involve, physical, emotional, sexual, financial or psychological abuse. Even if the child is not subjected to direct domestic violence, witnessing it is likely to have a damaging effect on the psychological health and development of children.

Appendix 2 – Role descriptions

Role description for Senior Safeguarding Lead (SSL)

The role of the Senior Safeguarding Lead is to: provide effective club-wide strategic leadership and management with a clear sense of direction and purpose that assists the club in delivering its safeguarding strategy, vision, values, priorities, policies and aims to promote and protect the welfare of vulnerable groups.

The SSL shall:

1. Be the designated member of staff to liaise and work in partnership with the Premier League and other football authorities;
2. Act as the first point of contact for any report of suspicion of abuse or concern relating to the welfare of a child at risk engaged in activities with the club;
3. Liaise regularly with and be guided by the advice of the relevant local and statutory authorities and the League with regards to issues concerning the safeguarding of children and young people;
4. Where possible, report directly to the Senior Safeguarding Manager(s). This includes reporting on a regular basis on the effectiveness of, and the club's compliance with, its policies and procedures for the safeguarding of children and young people;
5. Work closely with HR and heads of departments to develop and implement safer recruitment and induction practices across the organisation;
6. Provide leadership, direction and guidance to the Designated Safeguarding Officers, Welfare Officers and Safeguarding Coordinators ensuring they are trained, supported and adequately supervised;
7. Review and approve the safeguarding provision for all activities within the club;
8. Ensure strict compliance with the club's policies and procedures for the safeguarding of children and young people;
9. Ensure the club is compliant with statutory obligations under relevant legislation and the Premier League's safeguarding rules;
10. Promote awareness within the club of the safeguarding of children and young people and encourage and monitor the adoption of best practice procedures in that regard;
11. Act as the lead Club Official in any investigation of an allegation of abuse of a child or young person;
12. Maintain the safeguarding of Vulnerable Groups Staff register for each activity in such format as approved by the League;

13. Be known to all staff and children, and their parents or guardians, engaged in an activity with the club and be available in person or by telephone/email to Staff and such children (and their parents or guardians) at all reasonable times;
14. Provide guidance to and support for any member of staff engaged in each activity who reports suspected abuse of a child or concerns as to their welfare;
15. Be responsible for maintaining clear, comprehensive and up-to-date records of all allegations of abuse or poor practice, details of how such allegations are resolved and any decisions reached;
16. Set up and maintain the club's Safeguarding Sub Committee, ensure at least quarterly meetings occur and organise CPD sessions as required;
17. 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;
18. Ensure staff understand their individual responsibilities to safeguard and promote the welfare of vulnerable groups;
19. Attend regular safeguarding training and maintain an up-to-date knowledge of relevant legislation, regulations and best practice to help ensure the club's compliance.

Role description for Designated Safeguarding Officer:

The role of the Designated Safeguarding Officer (DSO) is to: Support the Safeguarding Manager 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:

1. To work with the Senior Safeguarding Lead and Safeguarding Co-Ordinator to implement and promote the club's safeguarding policies and procedures within their department;
2. To provide active input into the club's Safeguarding Sub Committee and attend meetings and CPD sessions as required;
3. Contribute to maintaining and improving the club's safeguarding provision;
4. Advise others working with vulnerable groups on the implementation of organisational policies and procedures to safeguard and promote the welfare of vulnerable groups.
5. Ensure staff understands their individual responsibilities to safeguard and promote the welfare of vulnerable groups;
6. Act as a source of safeguarding support, advice and expertise within their department.
7. Support colleagues to respond appropriately to concerns about the welfare or safety of vulnerable groups;
8. To give direction and guidance to staff in respect of safeguarding incidents, concerns and allegations and assist the Safeguarding Manager with managing these;
9. Assist the Senior Safeguarding Lead to maintain accurate and confidential information.
10. Pro-actively promote and raise safeguarding awareness;
11. Promote a safe working environment.

Appendix 3 – Safeguarding children referral form

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

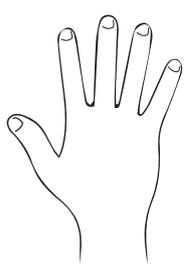
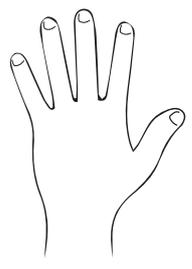
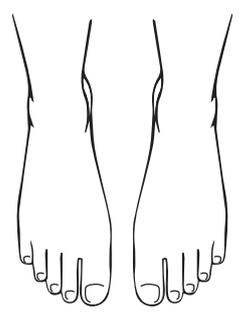
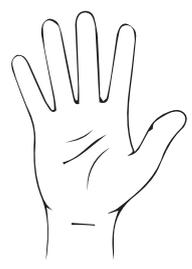
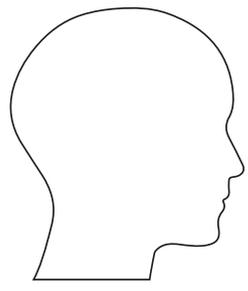
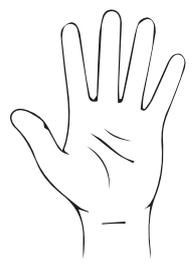
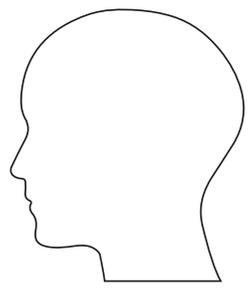
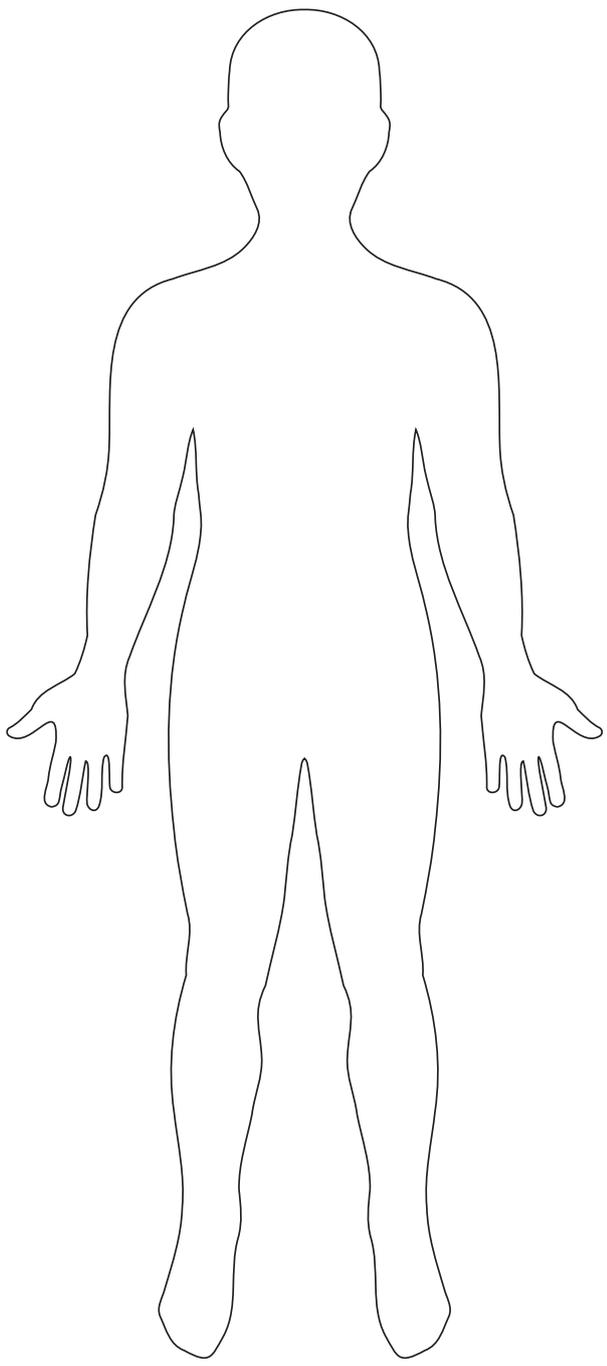
Your name:	Date:
Your position:	Contact tel no:
Child's name:	Gender: Male / Female
Child's date of birth:	Age:
Child's address:	
Child's contact tel no:	
Parents / carers names and addresses:	
Contact tel no:	
Date and time of any incident:	
Place of incident:	
Name of the person(s) alleged to be responsible for the cause of the significant harm:	

Exactly what has been disclosed:

Observations or background information :

Action taken so far:

Body map:



Appendix 4 – External agencies contacted record (Senior Designated Safeguarding Officer use only)

Police	Yes / No
If yes – which:	
Name and contact number:	
Details of advice received:	
Local authority	Yes / No
If yes – which:	
Name and contact number:	
Details of advice received:	
The FA Safeguarding Case Management Team	Yes / No
If yes – which:	
Name and contact number:	
Details of advice received:	
The English Football League	Yes / No

If yes – which:	
Name and contact number:	
Details of advice received:	
The English Football League Trust	Yes / No
If yes – which:	
Name and contact number:	
Details of advice received:	
Other agencies or partners (e.g. NSPCC / Childline)	Yes / No
If yes – which:	
Name and contact number:	
Details of advice received:	

Signed:

Date:

Appendix 5 – Key safeguarding contacts

Club safeguarding contacts Role and job title	Name	Contact information
Senior Safeguarding Managers (Deputy Chairman & Chief Executive BHAFC)	Paul Barber (BHAFC)	paul.barber@brightonandhovealbion.com
Senior Designated Safeguarding Officer (Head of HR)	Rose Read (BHAFC/AITC)	01273 878286 (office) 07584 102291 (mobile) rose.read@brightonandhovealbion.com
Club Senior Safeguarding Lead	Richard Valder-Davis (BHAFC/AITC)	07718 437725 richard.valder-davis@brightonandhovealbion.com
Designated Safeguarding Officers (one for each business area)		
BHAFC (Amex Stadium) (Head of People & Culture)	Rose Read	01273 878286 (office) 07584 102291 (mobile) rose.read@brightonandhovealbion.com
Academy Designated Safeguarding Officer	Joss Albert	07805 069481 joss.albert@brightonandhovealbion.com
AITC (CEO)	Matt Dorn	01273 878235 (office) 07876898037 (mobile) matt.dorn@albioninthecommunity.org.uk
Matchdays (Safety & Security Manager/Matchday Safety Officer)	Adrian Morris	01273 647249 (office) 07785 460346 (mobile) adrian.morris@brightonandhovealbion.com
Training Ground/Women and Girls' Football Designated Safeguarding Officer	Joss Albert	07805 069481 joss.albert@brightonandhovealbion.com
Safeguarding Coordinator		
Safeguarding Coordinator AITC	Holly Baker	07851 249673 holly.baker@albioninthecommunity.org.uk
External Safeguarding Contacts		
Premier League Head of Safeguarding	Jessica Addicott	020 7864 9173 07917 204 890 jaddicott@premierleague.com
Premier League Safeguarding Support Manager	Jim Dyson	07557 534676 jdyson@premierleague.com
The Sussex County FA (County Welfare Officer)	Sandra Redhead	01903 768578 07525 667076 sandra.redhead@sussexfa.com
The FA Safeguarding Team (Wembley)		0844 980 8200 (extension 4787)
Sussex Police		101 - non-urgent calls 999 - emergencies
Front Door for Families – Brighton (First point of contact for safeguarding concerns in Brighton and Hove)		01273 290400 (Outside of normal office hours call the number above to receive a message giving emergency contact details) FrontDoorForFamilies@brighton-hove.gov.uk

Multi Agency Safeguarding Hub – West Sussex (First point of contact for safeguarding concerns in West Sussex)		01403 229900 MASH@WestSussex.gov.uk www.westsussexscp.org.uk
Brighton & Hove Local Safeguarding Children Board (LSCB)		01273 292379 FrontDoorForFamilies@brighton-hove.gov.uk www.bhscp.org.uk
The Local Authority Designated Officer (LADO) for Brighton & 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 07795 335879
The Local Authority Designated Officer (LADO) for West Sussex 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.	Sam Edefe	0330 222 3339 LADO@WestSussex.gov.uk 0330 222 6450
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)
Childline		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 0300 131 4500

Appendix 6 – Other applicable club policies and legislation:

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

Relevant legislation/regulations/codes of practice:

- Working Together to Safeguarding Children December 2020
- 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
- Premier League Rules and Guidance
- 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) September 2021
- International Safeguards for Children in Sport

Please note that the lists are not exhaustive.

Appendix 7a – Staff reporting flowchart

Any member of staff member has a concern or has been passed information regarding a concern relating to any child or vulnerable adult.

In the event that there is a risk of immediate harm or advice is required urgently, the staff member should make immediate contact with the appropriate statutory agency. Police – 999

If the concern relates to a disclosure being made by a child or vulnerable adult staff should ensure they:

- Listen, do not judge
- Reassure them they have done the right thing
- Tell them its not their fault
- Tell them you will take them seriously but
- Don't investigate or confront persons involved
- Explain the next steps

At the earliest opportunity and within 24 hours of learning about the concern, contact the Designated Safeguarding Officer for your area of the organisation (see below) and advise them of your concern.

This contact can be in person, over the phone, in person or through any other system endorsed by the club. If the DSO is not available then contact the Club Safeguarding Manager Richard Valder-Davis or Senior Designated Safeguarding Officer Rose Read.

If at this stage none of the safeguarding members of staff are available contact can be made with any of the following for advice:

- The Front Door For Families Brighton & Hove: 01273 290400 or 01273 335905 (out of hours).
- East Sussex Child Services: 01323 464222 or 01273 335905 (out of hours).
- West Sussex Child Services: 01403 229900 or 033022 26664 (out of hours).

At this stage the concern may have been raised by staff located at another location e.g. a school, another football club, or a sports facility. Consideration should also to also making other safeguarding structures aware e.g. school DSL

As soon as practicable staff should make a record of their concern using the safeguarding referral form attached in Appendix 3 of the policy. Include as much detail as possible and forward to the DSL.



Richard Valder-Davis
Club Safeguarding Manager
07718 437725



Rose Read
Senior DSO
01273 878286



Joss Albert
DSO TG/Women
and Girls
07805 069481



Adrian Morris
Matchday DSO
07785 460346



Joss Albert
DSO Academy
07805 069481

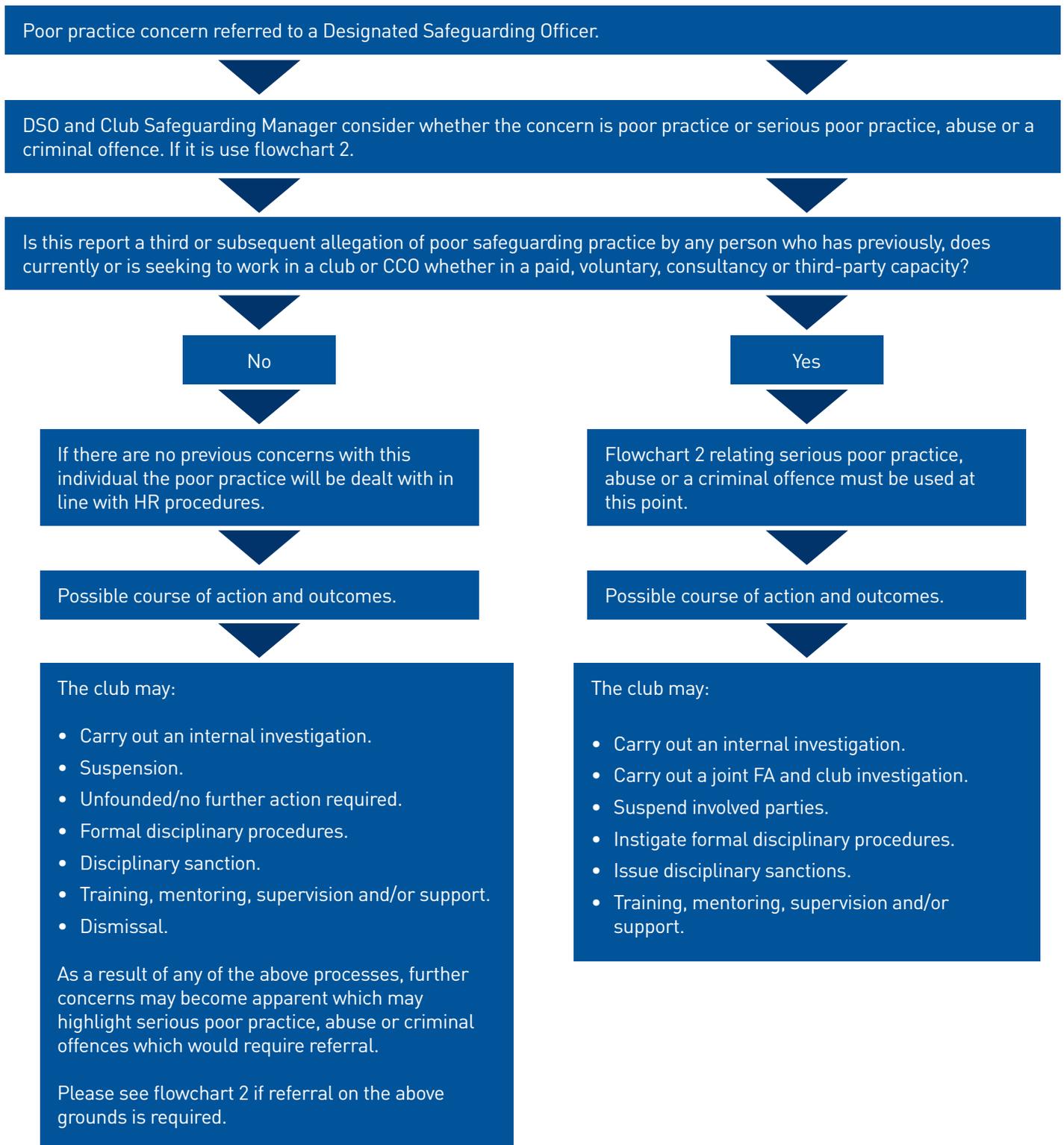


Matt Dorn
DSO AITC
07876 898037



Holly Baker
Safeguarding
Coordinator AITC
07851 249673

Appendix 7b – Flowchart 1 relating to poor practice concern being recognised



Appendix 7c – Flowchart relating serious poor practice, abuse or a criminal offence.

Concern of serious poor practice, abuse or a criminal offence referred to any member of staff, will be immediately raised to either DSO for their area or in their absence the Club Safeguarding Manager (Richard Valder-Davis).

Note: Any member of staff can make a referral directly to any statutory agency and/or football authority if they are concerned about a child at risks immediate safety. The DSO or Club Safeguarding Manager should be informed as soon as practicable after such a referral is made.

DSO and Club Safeguarding Manager dynamically risk assess this concern raised and consider the immediate risk posed to any person and always consider 999.

If no immediate risk is posed, a referral to the relevant statutory agency should be made as soon as practicable if the concern meets thresholds. On all occasions of serious poor practice, abuse or a criminal offence the LADO should be informed for a consultation which can take place over the phone.

- Brighton and Hove LADO is Darrel Clews (tel: 01273 295643)
- West Sussex LADO is Lindsey Tunbridge Adams (tel: 0330 222 3339)
- East Sussex LADO is Amanda Glover (tel: 01323 747363)

Referral made to the football authorities (FA and PL) within 24 hours or referral or as soon as practicable by completing and submitting an affiliated football referral form.

Consideration should be made to sharing information at this stage with other organisations with safeguarding responsibilities for any children or young person involved, in line with our commitment to Working Together 2018 guidelines. Examples of this could be schools or other football clubs. The requirement to share this information may be outlined in an agreement falling outside of this policy. The rationale for sharing such information on this basis should always be recorded.

Possible course of action and outcomes.

The club may:

- Take part in a multi-agency strategy meeting.
- Implement agreed multi agency actions.
- Be advised by statutory agencies that they will not take further action. In this circumstance the FA and club will manage the concern.
- Conduct formal disciplinary procedures.
- Joint FA and club investigation.
- Training, mentoring, supervision and/or support.
- Provide support for the individuals concerned with concerns and cases.

The Premier League and PLCF acting in a regulatory capacity:

- Provide support and guidance.
- Support safeguarding structure to improve through learning.
- Issue sanctions to clubs if Premier League Rules have been breached.

Possible course of action and outcomes.

Statutory authorities may:

- Instigate a multi-agency strategy meeting.
- Criminal investigations and court proceedings.
- Local authority investigation.
- A joint police and local authority investigation.
- Care or protection orders issues.
- Statutory authorities may advise that the referral does not meet their thresholds or there is insufficient evidence.

The FA

- Investigation independent of club.
- Risk assessment to determine whether the individual does or may pose a risk of harm.
- Training, mentoring or supervision.
- Interim or permanent suspension from football.

Appendix 8 – Ensuring safe online communication – November 2020

During this unprecedented period, live online interactions with children and adults at risk across the club and charity are encouraged. These interactions will certainly help maintain motivation, mental and physical fitness as well as providing a much-needed break for parents and carers!

Much like in person, we need to ensure as we continue to use virtual methods of interaction, we do so safely and sensibly. Following some questions on best practice, below is some guidance.

As always do not hesitate to make contact if you have any questions about the guidance or any welfare or safeguarding concerns about the young people and adults you are working with. This may include comments they have made, concerns around living conditions, or not being able to get hold of someone for a duration of time.

richard.valder-davis@brightonandhovealbion.com (BHAFC)

joss.albert@brightonandhovealbion.com (BHAWFC)

holly.baker@albioninthecommunity.org.uk (AITC)

All communications

- Ensure that all communication is for the purpose of your role within the club or AITC.
- Make a note somewhere of the call, who was on it and the purpose. The Calendar function in Microsoft Outlook could be used. If one-to-one online sessions take place, always ensure your line manager is made aware of the contact.
- Sessions must be conducted in a place that is observable and interruptible. Places not suitable would be in a bathroom, in a car, in bed.
- Sessions must take place over a suitable platform as agreed by the club or AITC, and must be linked to a workplace account or email rather than a personal one.
- Ensure your own personal social media accounts are private and inaccessible to participants.

Under 18's

Always ensure that parents and carers are aware that you are making online contact with their children. The majority of the time you will be using the adult's contact details so this should be quite simple. If you are not using the parent's email (16-18-year-olds) ensure the parent or carer is aware of the contact and why/how this is taking place.

A one-to-one session **must** be conducted with a parent or carer within the vicinity and earshot of the young person. To confirm this the parent or carer should be seen at the start and end of each session. Avoid being alone with a child online, during this period of lockdown many parents should be working from home, alternatively see if a colleague can call into the session.

Some pitfalls we want to avoid

Casual or intimate atmospheres: Whilst contact will be in the home environment avoid intimate or inappropriate locations for the session, casual dress, nicknames, private conversations, observational comments about home or family, oversharing personal details. If participants are inappropriate in their comments, dress or behaviour they should be removed from the call.

Be aware that participants may (unbeknown to the person delivering) record sessions and your words may be seen on social media. We sincerely hope this does not happen but please ensure professionalism throughout the call

On camera an impersonal or blurred background is preferred and is less distracting for interaction. Ensure you are not displaying any of your own personal information in the background, e.g. certificates, personal photographs or calendars. A professional tone is critical to maintain professional boundaries and easier integration back into the normal environment. If your preferred platform or internet fails for any technical reason, avoid the temptation to change platforms to a child's social media platform. Reschedule the session instead.

If you do plan to record sessions, ensure you have permission from parents (an email or verbally recorded at the start of a session will be sufficient) to record the session and that you tell them the recording will be used for internal purposes only. All recorded sessions will be saved to the Stream App within Microsoft Office 365.

Ensure that sessions are predictable, structured and distraction free and don't move away from the reason for the call.

Meeting children on other platforms, taking photos/screen shots out of planned session contact or inappropriate language are all examples of behaviours that would not be tolerated in person and therefore will not be tolerated in the online environment.

Useful Information for Remote Communications

Professionals Online Safety Helpline (POSH)

helpline@saferinternet.org.uk

0344 381 4772

NSPCC

0808 800 5000

London Grid for Learning

Safeguarding for live streaming poster

Safeguarding and remote education during coronavirus (Covid-19)