



SAFEGUARDING CHILDREN AND YOUNG PEOPLE

GUIDANCE TO MEMBER CLUBS AND COMMUNITY TRUSTS 2017



FOREWORD

With so many people directly involved in or influenced by professional football, it is essential that the English Football League (EFL), Clubs and their Community Trusts acknowledge the role they play in creating a safe environment for everybody involved in the game, especially for the more vulnerable, which includes Children and young people. The EFL continues to work closely with both the Premier League and the FA in this important area.

The EFL has revised this 'Guidance to Member Clubs and Community Trusts' to take account of the changes in legislation since the last publication. In addition, the EFL promotes safe recruitment practices in line with Keeping Children Safe in Education (KCSIE 2016). Member Clubs and Community Trusts need to be clear in respect of their responsibilities in helping make football a safer place for all.

The EFL requires all of its member Clubs and Community Trusts to follow this guidance.

This guidance also endorses and promotes the Affiliated Football's Safeguarding Policy and Procedures, with the object of ensuring that we have a proactive and integrated approach to safeguarding consistent across Football. It recognises that professional Clubs and Community Trusts have a duty of care to all Children who participate in their activities, and it outlines the arrangements Clubs and Community Trusts must have in place to meet that duty.

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Chief Executive Officer
EFL





GLOSSARY

Children - Any child or young person under 18 years of age

Club - Club and Community Trust

CPD - Continuous Professional Development

CPS - Club Portal System

CPSU - Child Protection in Sport Unit

CRC - Criminal Records Check

DBS - Disclosure & Barring Service

DSO - Designated Safeguarding Officer

EFL - English Football League

EFL CPA - English Football League Child Protection Advisor

EFL Trust - English Football League Trust

EFL Trust DSO - English Football League Trust Safeguarding Officer

FA CRC - The Football Association Criminal Records Check

KCSIE - Keeping Children Safe in Education

LADO - Local Authority Designated Officer

LFE - League Football Education

LSCB - Local Safeguarding Children's Board

NSPCC - National Society for the Prevention of Cruelty to Children

SSM - Safeguarding Senior Manager

Staff - Staff and volunteers

The FA - The Football Association



OVERVIEW

Whilst in this document we refer to the requirements Clubs should meet, the requirements will also apply to each company or organisation associated with the Club, including for example, Community Trusts. Clubs should ensure all aspects of club-branded operations properly implement these requirements.

Your Club/Community Trust should implement:

- A model of safeguarding within the Club
- Written policies and procedures for the safeguarding of Children, young people and vulnerable adults
- Systems for staff recruitment, induction, training and development which demonstrate the Club's responsibilities and arrangements for safeguarding

These must be available for all staff, volunteers and commissioned/contracted service providers.

By way of example, the EFL's commitment to meeting its safeguarding responsibilities is available in the EFL Handbook and on the CPS.

To meet the guidance your Club should have in place:

- 1** A clear line of accountability within the Club for work on safeguarding and promoting the welfare of Children.

- 2** A clear statement of the Club's commitment and responsibilities towards safeguarding Children, which must be available to all staff and volunteers and should feature in all key policy documents.

- 3** Safe recruitment procedures for Club staff and commissioned or contracted providers.

- 4** Induction and training on safeguarding and promoting the welfare of Children for all staff working, or in contact, with Children.

- 5** Professional development opportunities must take account of the need to safeguard and promote welfare and are informed, where appropriate, by the views of Children and families.

- 6** Effective inter-agency working to safeguard and promote the welfare of Children, including arrangements which set out clearly the processes for making a referral to and sharing information with the LADO, local authority children's social care, the police and/or the Football Authorities.

Further details on each heading are set out over the page.

1

A CLEAR LINE OF ACCOUNTABILITY WITHIN THE CLUB FOR WORK ON SAFEGUARDING AND PROMOTING THE WELFARE OF CHILDREN.

Your model should demonstrate accountability within the Club.

- 1.1** You should identify a senior member of the management team or Board as the Safeguarding Senior Manager (SSM) to take leadership responsibility for the Club's safeguarding arrangements. A role specification or job description should be agreed that encompasses this responsibility. SSMs will be required to undertake safeguarding training appropriate to their role a minimum of every two years and receive at least annual updates on developments in the field.

SSMs are required to be responsible for:

- supporting staff who make their own referrals to Children's Services/Channel.
- liaising with the case manager/LADO regarding allegations.

Whilst the Board and SSMs take lead responsibility for Safeguarding they need to make clear that safeguarding is everyone's responsibility and should ensure that mechanisms are in place to assist staff in discharging their duties as outlined in sections 6.3 & 6.4.

and

- 1.2** You should appoint a Designated Safeguarding Officer (DSO) who will provide a lead for safeguarding within the club. A role specification or job description should be agreed in order that they clearly understand their roles and responsibilities. The DSO will be responsible for ensuring that the Club has in place safeguarding policies as well as procedures that outline the process for reporting concerns, allegations or disclosures regarding the welfare of a Child. Clubs and Community Trusts should ensure that sufficient time, funding, supervision, training and support is provided for the DSO to fulfil their safeguarding responsibilities effectively.

In addition

- 1.3** Recognising that there are different aspects of Club operations e.g. Academy, Community Trusts, Match Day Events, Commercial and Customer Services, you should identify a DSO for different departments within the Club who should meet on a quarterly basis to review incidents and share information in accordance with Working Together (2015) as amended from time to time. Minutes of such meetings should be recorded and stored appropriately in line with The Data Protection Act (1998) and should be reported to the SSM on a regular basis. Information on Recording and Storing Information can be found on the EFL CPS. Reports on safeguarding issues should also be presented to the Board on a regular basis.

Examples of job descriptions and the competencies required for the above roles are available on the EFL Club Portal System (CPS).



2

A CLEAR STATEMENT OF THE CLUB'S COMMITMENT AND RESPONSIBILITIES TOWARDS SAFEGUARDING CHILDREN, WHICH MUST BE AVAILABLE TO ALL STAFF AND VOLUNTEERS AND SHOULD FEATURE IN ALL KEY POLICY DOCUMENTS.

As a minimum your Club should have in place the following policies and accompanying procedures:

- Safe Recruitment of Staff and Volunteers
- Safeguarding Children Policy
- Procedure for reporting poor practice, concerns/allegations or disclosures of abuse
- Code of Conduct (Ethics)
- Equal Opportunities Policy (Equity)
- Anti-bullying Policy (including peer to peer)
- Confidentiality Statement
- Whistle-blowing Policy
- Complaints Procedure and Appeals Process
- Management of Allegations against Staff and Volunteer
- Health and Safety Policy
- Information Sharing Policy
- Policy for Trips, Tours and Tournaments
- Accommodation Providers Guidance
- Parental Consent Form
- Photography/Images Policy
- Social Media Policy
- IT Acceptable Use Policy
- Transport Policy
- Late Collection of Children Policy
- Other policy documents as appropriate to the activities of the Club

The policies and procedures should:

- Reflect good practice in line with your LSCB's guidance
- Work towards maintaining and embedding the "Standards for Safeguarding and Protecting Children in Sport" as published by the NSPCC CPSU and adopted by The FA and EFL
- Recognise the role of the International Safeguards for Children in Sport
- Be endorsed and minuted by your Club's Board of Directors or Trust's Board of Trustees

All staff should receive a copy of the club safeguarding policy on induction. In addition a copy of Part 1 of KCSIE should be issued with the policy to all staff working with children.

Further guidance and examples of other appropriate policy documents are available on the EFL CPS and at www.thefa.com



3

SAFE RECRUITMENT PROCEDURES FOR CLUB STAFF AND COMMISSIONED OR CONTRACTED PROVIDERS.

Your Club should understand the importance of the Government Guidance 'Keeping Children Safe in Education' (KCSIE) and have in place safe recruitment procedures for individuals whom the Club will permit to work regularly with Children, including policies on when to obtain a criminal record check. Clubs and Community Trusts are responsible for ensuring that their staff are competent to carry out their responsibilities for:

- Safeguarding and promoting the welfare of Children
- Creating an environment where staff feel able to raise concerns and feel supported in their safeguarding role

As a minimum this should include:

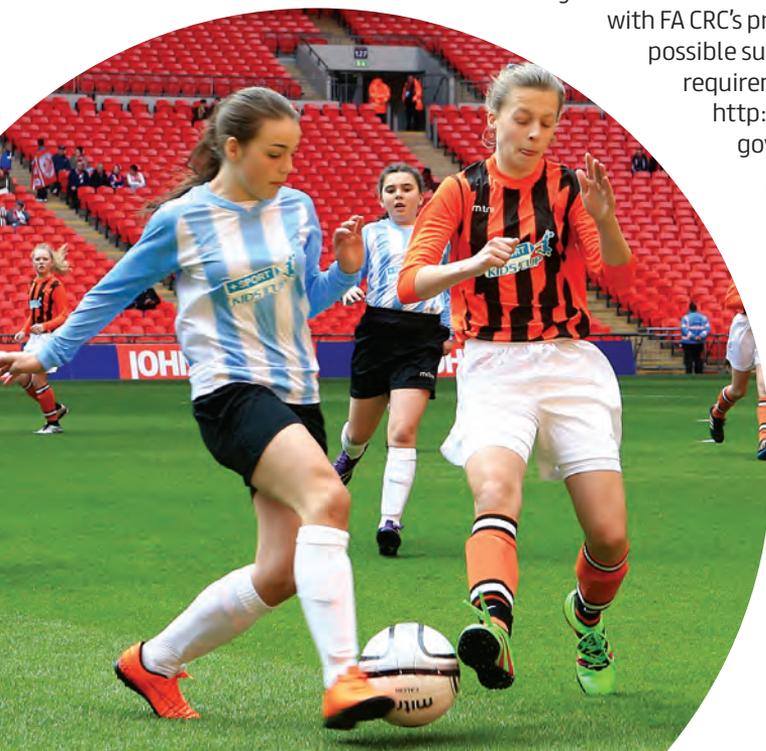
- A role/job description/specification
- Advertisement of the role in line with Club policy
- Interview process
- DBS Criminal Records Checks for those requiring such checks for work with Children or vulnerable adults, in line with guidance provided by the DBS, The FA and EFL
- Verification of identification, appropriate qualifications and eligibility to work in the UK, including checking with The FA to ensure that the applicant is not suspended from football
- The taking up of two written references
- Employment offers, subject to all of the above, and a successful probationary period

EFL recognises and adopts FA CRC as an appropriate umbrella body for processing Criminal Records Checks to safeguard Children in football. Any applicant must be showing as 'accepted' on The FA Whole Game database before taking up a post.

A DBS Criminal Records Check through the above system is mandatory for all persons applying for, or currently in, such positions that are defined in law as 'Regulated Activity,' or that The FA deems relevant and whose normal duties include coaching, teaching, training & instruction, caring for & supervising or providing advice & guidance on wellbeing for Children. Failure to comply with FA CRC's process may result in sanctions and possible suspension. Further information on FA requirements is available on The FA website. <http://www.thefa.com/football-rules-governance/safeguarding>

Further information on DBS and 'Regulated Activity' and also on safe recruitment* can be found on the CPS.

*Part 3 of 'Keeping Children Safe in Education.' (2016) as revised from time to time.



4

INDUCTION AND TRAINING ON SAFEGUARDING AND PROMOTING THE WELFARE OF CHILDREN FOR ALL STAFF WORKING, OR IN CONTACT, WITH CHILDREN.

Your Club must provide induction, training, supervision and support for all staff working, volunteering or who are in regular contact with Children.

Induction should include:

- Information and contact details of the Club's DSO
- A mandatory induction which includes a familiarisation session with the DSO who should:
 - Provide an overview of the Club's safeguarding policy and commitment
 - Outline the procedures to be followed if anyone has any concerns about a Child's safety or welfare

A meeting with DSOs should test the maturity and understanding boundaries and position of trust of new staff undertaking work with children

Training should include:

- An understanding of the Legislation and Football Regulations regarding Safeguarding
- Recognising indicators and signs of abuse
- The Club procedure for responding to, reporting, recording and referral of concerns, allegations or disclosures of abuse
- The process for reporting and managing allegations against staff and volunteers
- Regular refresher training on safeguarding, in addition staff should receive safeguarding and child protection updates at regular staff/ departmental meetings but at least annually, to provide them with relevant skills and knowledge to safeguard effectively.
- Information on further/specialist advice and support agencies available

The "FA Safeguarding Children Workshop" provides appropriate training to meet this requirement. Additional information to support staff training and details of other specialist advice agencies is available on EFL CPS. In addition:

The SSM must attend mandatory EFL Safeguarding Training for Senior Managers every two years. DSOs must attend mandatory EFL safeguarding training for DSOs annually.



5

PROFESSIONAL DEVELOPMENT OPPORTUNITIES MUST TAKE ACCOUNT OF THE NEED TO SAFEGUARD AND PROMOTE WELFARE.

Your Club should ensure that all staff working with Children and young people receive appropriate CPD to support their work having regard to the role and level of contact they have with Children, making resources available including time and travel opportunities for training events. This may be coordinated, facilitated or delivered by the Club DSO. EFL provides annual safeguarding workshops to support Clubs and Community Trusts in meeting this requirement.

If your Club chooses to source other CPD, that CPD must be informed, where appropriate, by the views of Children and families.

6

EFFECTIVE INTER-AGENCY WORKING TO SAFEGUARD AND PROMOTE THE WELFARE OF CHILDREN, INCLUDING ARRANGEMENTS WHICH SET OUT CLEARLY THE PROCESSES FOR MAKING A REFERRAL TO AND SHARING INFORMATION WITH THE LADO, LOCAL AUTHORITY CHILDREN'S SOCIAL CARE, THE POLICE AND/OR THE FOOTBALL AUTHORITIES.

This must include:

6.1 Provision of Contact Details to the EFL

At the start of each season your Club must provide to the EFL CPA contact details for:

- The Safeguarding Senior Manager
- Any additional DSO

You must also report any changes of such personnel within 14 days of the change.

6.2 Dealing with allegations of abuse

Clubs and Community Trusts must have clear policies and procedures for dealing with allegations against people who work with Children. Examples include allegations of:

- Behaviour that has, or may have, harmed a Child
- Criminal acts against or related to a Child; or
- Behaviour towards a Child or Children in a way that indicates they may pose a risk of harm to Children

Any such allegation should be reported immediately to the DSO at the Club / Trust. The LADO should also be informed within one working day of all allegations that come to a Club's / Trust's attention or that are made directly to the police or other statutory agency.

DSOs should press statutory and regulatory bodies if they feel a referral which should be handled by those agencies is referred by the club.

6.3 Notification to EFL or EFL Trust DSO and The FA

Clubs and Community Trusts must notify the FL CPA or EFL Trust DSO and The FA Case Management Team of any safeguarding referral made to:

- The police
- The LADO and/or
- Any other statutory agency, social care or Children's Services Directorate

6.4 DBS Referrals

If any person working or volunteering in a Regulated Activity for the Club / Trust is suspended as a result of a concern, or internal investigation, for reasons connected to their role with Children, young people or vulnerable adults then the Club / Trust must notify The EFL CPA or EFL Trust DSO and The FA Case Management Team as soon as practicable and in any event within 72 hours.

Your Club, in so far as it is a provider of any Regulated Activity, will be required to follow the DBS "Referral Guidance" and will also have a legal duty to make a referral to DBS in certain circumstances. The FA and EFL will provide support with this process. An information sheet of frequently asked questions regarding the referral process is available on CPS.

The key principals and requirements identified in this document also apply for work with Adults at Risk. Clubs and Community Trusts should seek further advice from EFL CPA or search the local authority website for key contact for reporting concerns regarding Adults at Risk.

FURTHER INFORMATION

EFL Club Portal System	(DSO registration required for EFL CPS access)
EFL Child Protection Advisor	ahussey@efl.com
EFL Trust DSO	ctaylor@efltrust.com
The Football Association	www.thefa.com/football-rules-governance/safeguarding
FA Safeguarding Team	0800 169 1863 or via Safeguarding@TheFA.com
The FA CRC	FAChecks@TheFA.com GBGroup (formerly TMG CRB 2015) are the Registered Body administering the CRC process on behalf of The FA
LFE	League Football Education www.lfe.org.uk Tel: 01772 326870
NSPCC Helpline number	www.nspcc.org.uk 0808 800 5000
Text phone number	88858
Childline	www.Childline.org.uk 0800 1111 (Free, confidential 24-hour helpline for Children and young people)
CEOP	Child Exploitation and Online Protection Centre www.ceop.gov.uk (Dedicated to eradicating the sexual abuse of Children)
Child Protection in Sport Unit	www.nspcc.org.uk/inform/cpsu (works with sports governing bodies to minimise the risk of Child abuse)
Anti-Bullying Alliance	www.anti-bullyingalliance.org.uk (Brings together over 60 organisations into one network to develop a consensus around how to stop and prevent bullying. Aims to influence policy and develop and disseminate (best practice)
Charity Commission	www.charity-commission.gov.uk 0845 3000 218
DBS	The Disclosure & Barring Service (helps employers make safer recruitment decisions) www.gov.uk/government/organisations/disclosure-and-barring-service
DBS Referral Guidance	Factsheet: when to make a referral to the (DBS) https://www.gov.uk/government/collections/dbs-referrals-guidance--2#barring-and-referral-guidance
DBS Frequently Asked Questions	https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/143692/dbs-referral-faq.pdf
DBS and 'Regulated Activity'	www.gov.uk/government/organisations/disclosure-and-barring-service
Working Together to Safeguard Children	A guide to inter-agency working to safeguard and promote the welfare of Children 2015 www.gov.uk/government/publications/working-together-to-safeguard-children
Keeping Children Safe in Education	Statutory guidance for schools and colleges. www.gov.uk/government/uploads/system/uploads/attachment_data/file/550511/Keeping_children_safe_in_education.pdf

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