Middlesbrough Football Club

and

Middlesbrough Football Club Foundation

Safeguarding Policy

2025-26

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STATEMENT OF COMMITMENT

Middlesbrough Football Club ("MFC") and Middlesbrough Football Club Foundation ("the Foundation") (together "the Organisations") are fully committed to the safeguarding and welfare of children, young people, young players, and adults at risk ("Vulnerable Persons") in all groups including customers, supporters, participants and staff; and expects all Organisation Personnel (which for the purpose of this Policy includes volunteers), players and participants to share this commitment. This is paramount to the Board of both Organisations.

The Organisations ensure that they meet all Football Association (FA) and English Football League (EFL) requirements for safeguarding, including the EFL Safeguarding Standards.

The Organisations make provisions for Vulnerable Persons, ensuring that:

- the welfare of these persons is paramount.
- all Vulnerable Persons, including those with the protected characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation, have the right to safety and protection from abuse and harm.
- processes are in place for the protection of Vulnerable Persons from radicalisation.
- all suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately.
- all Organisation Personnel have a responsibility to report concerns to the Club Head of Safeguarding or Designated Safeguarding Officers.
- safeguarding is everyone's responsibility.

Signed on behalf of Middlesbrough Football Club & Middlesbrough Football Club Foundation

Neil Bausor

Chief Executive – Middlesbrough Football Club

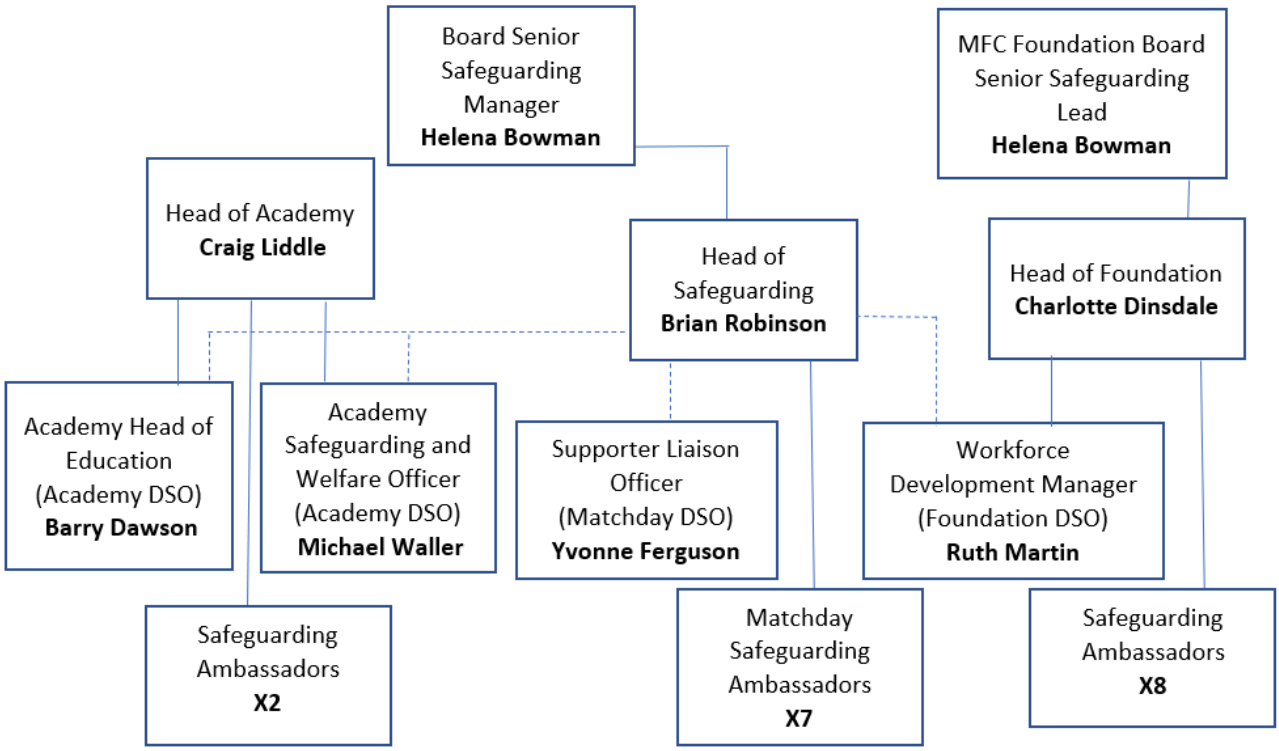
John Baker

Chair – Middlesbrough Football Club Foundation

1. KEY CONTACTS

Safeguarding Team

Safeguarding Organisational Chart



1.1. ORGANISATIONAL SAFEGUARDING CONTACTS

Helena Bowman – Middlesbrough Football Club Board Level Senior Safeguarding Manager (BSSM)/ Middlesbrough Football Club Foundation Safeguarding Trustee

07595 520605

Brian Robinson – Club Head of Safeguarding, MFC & the Foundation (CHOS)

07842 012759

1.2 DESIGNATED SAFEGUARDING OFFICERS (DSO)

Ruth Martin – Workforce Development Manager (Foundation DSO)

07842 017778

Yvonne Ferguson – Supporter Liaison Officer (Matchday DSO)

(01642) 757648 /07841 997704

Barry Dawson - Academy Head of Education (Academy DSO)

(01325) 722222 / 07801 335 763

Michael Waller – Academy Safeguarding and Welfare Officer (Academy DSO)

07942001675

1.3 SAFEGUARDING AMBASSADORS

The Organisation also has Safeguarding Ambassadors in the Foundation, Academy, hospitality, concourse and stewarding, who support the safeguarding team.

If you have <u>serious concerns</u> about the immediate safety of a Vulnerable Person, contact the Police (101 or 999) Record the name of the person you spoke to and an incident number and inform the relevant CHOS/DSO of the report and any actions.

2. POLICY STATEMENT

The Organisations recognise their respective duty of care to safeguard from harm all Vulnerable Persons involved in activities organised by them. All Vulnerable Persons have the right to be protected. The needs of disabled persons and others who may be particularly vulnerable must be taken into account. The Organisations will do their utmost to ensure the safety and protection of all Vulnerable Persons involved in activities within their control through adherence to the safeguarding guidelines adopted by the Organisations.

On joining the Organisations, all Organisation Personnel receive a safeguarding induction. Those Organisation Personnel who work directly with Vulnerable Persons, receive enhanced safeguarding training.

Participants attending programmes at the Foundation, and Players are also advised in relation to the safeguarding procedures in place within the Organisations.

3. POLICY AIMS

The aim of our Safeguarding Policy is to:

- provide Vulnerable Persons with appropriate safety and protection whilst in the care of the organisations.
- ensure organisational personnel can make informed and confident responses relating to specific safeguarding issues.
- be confident in fulfilling legal and statutory obligations including but not limited to notifying the League and The Football Association through the submission of the Affiliated Football Safeguarding Referral Form of any abuse cases even if the victim and/or alleged perpetrator are deceased.
- to promote good practice through the provision of relevant safeguarding training, delivered by appropriate training providers as appropriate to their role or engagement.
- raise awareness amongst Vulnerable Persons and their parents/guardians/carers, through education and communication, to understand their role in safeguarding.

4. POLICY SCOPE

This policy applies to all activities run or manged by the organisations whether they are undertaken within the Stadiums, Training Ground, Academy, Foundation facilities or at any external venues. When references are made to adult professional football and Under 18's within an adult environment, this applies to both the Men's and Women's Teams.

5. DEFINITIONS

Child

An individual under the age of 18.

Please Note: It is Organisational policy that individuals under 14 years of age are not allowed to attend a Match at the Stadium without a qualifying adult (age 18-years and over). As a result, and in line with reasonable adjustments, any supporter who is under 14 years of age must attend a Match with a parent or guardian. Supporters over 14 years and under 18 years are allowed to attend a Match at the Stadium unaccompanied however they are not allowed to be responsible for another supporter. Only supporters aged 18 years and over can be responsible for a supporter under the age of 18 years.

Adult at Risk

A person aged 18 or over, who has care or support needs (whether or not the local authority is meeting any of those needs) and

- is experiencing, or at risk of, abuse or neglect and
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

For more detail around supporting adults at risk, please see the Adults at Risk Policy.

Organisational Personnel

Any member of the workforce for the organisations, in a paid or unpaid capacity including volunteers.

Vulnerable Persons

Children, young people, and Adults at Risk collectively.

6. ABUSE

6.1. DEFINTION OF ABUSE

Abuse includes any form of physical, emotional, or sexual mistreatment or lack of care that leads to injury or harm.

Abuse and neglect are generic terms encompassing all ill-treatment of Vulnerable Persons as well as cases where the standard of care does not adequately support the person's health or development.

Vulnerable Persons may be abused or suffer neglect through the infliction of harm, or through the failure to act to prevent harm. Abuse can occur in a family or an institutional or community setting. The perpetrator may or may not be known to the person.

Abuse can happen to a Vulnerable Person regardless of their age, gender, race or ability. Abusers can be adults (male or female) and other young people and are usually known to and trusted by the child and family. Further information can be found through the following links:

Working together to safeguard children inter agency guidance

Managing allegations against those who work or volunteer with children

6.2. TYPES OF ABUSE

In the context of safeguarding children, there are four main forms of abuse as set out below. Should you have any concern that abuse is occurring you should contact the CHOS or appropriate DSO immediately at safeguarding@mfcfoundation.co.uk

Physical Abuse
Where adults or other young people physically hurt or injure Vulnerable Persons, including by hitting, shaking, throwing, poisoning, burning, biting, scalding, drowning, suffocating, or otherwise causing physical harm to the Vulnerable Person. This category of abuse can also include when a parent/guardian or carer reports non- existent symptoms of illness or deliberately causes ill health in a child they are looking after known as fabricated or induced illness.

Examples of physical abuse in sport may be when a Vulnerable Person is forced into training and competition that exceeds the capacity of his/her immature and growing body; or where the Vulnerable Person is given drugs to enhance performance or delay puberty.

Sexual Abuse
When adults (male or female) or other young people use Vulnerable Persons to meet their own sexual needs.

Emotional Abuse
The persistent emotional ill treatment of a Vulnerable Persons likely to cause severe and persistent adverse effects on their emotional development. It may involve communicating to a Vulnerable Person they are worthless, unloved, inadequate, or valued only in terms of meeting the needs of another person. It may feature expectations of the Vulnerable Person that are not appropriate to their age or development. It may involve causing the Vulnerable Person to feel frightened or in danger by being constantly shouted at, threatened, or taunted which may make the child very nervous and withdrawn. Ill-treatment of a Vulnerable Person, whatever form it takes, will always feature a degree of emotional abuse.

Examples of emotional abuse in sport include subjecting children to constant criticism, name-calling, sarcasm or bullying. Putting a Vulnerable Person under consistent pressure to perform to unrealistically high standard's is also a form of emotional abuse.

Neglect
When adults fail to meet a Vulnerable Person's basic physical and/or psychological needs, to an extent that is likely to result in the serious impairment of the Vulnerable Person's health or development. For example, failing to provide adequate food, shelter, and clothing, failing to protect a Vulnerable Person from physical harm or danger, or failing to ensure access to appropriate medical care or treatment. Refusal to give a Vulnerable Person love, affection and attention can also be a form of neglect.

Examples of neglect in sport could include not ensuring Vulnerable Persons are safe, exposing them too undue cold or heat, or exposing them to unnecessary risk of injury.

Other forms of abuse include but are not limited to:

Child on Child Abuse

Child on Child abuse is any form of physical, sexual, emotional and financial abuse, and coercive control exercised between and within Vulnerable Person's relationships (both intimate and non-intimate). It can take many various forms including serious bullying (including cyber bullying), physical abuse, teenage relationship abuse, domestic violence, sexting, child sexual exploitation, youth and serious youth violence, harmful sexual behaviour and/or gender-based violence.

Child criminal exploitation (CCE) and child sexual exploitation (CSE)

Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CCE and CSE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation**.**

Child criminal exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Child sexual exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media.

CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16 and 17-year-olds who can legally consent to have sex. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship

Bullying

Bullying is not always easy to define and can take many forms including social media bullying, causing Vulnerable Persons to feel frightened or in danger, or the exploitation or corruption of children.

Examples of bullying in sport could include constantly pointing out the weaknesses of a Vulnerable Person in front of other children and not giving praise.

Sexual Harassment

Sexual harassment is any unwanted physical, verbal or non-verbal conduct of a sexual nature that has the purpose or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to sexual harassment. It can be sexual harassment if the behaviour has one of these effects even if it was not intended, or if it was intended to have one of these effects even if it did not have that effect.

Sexual harassment may include:

- Unwanted physical contact ranging from unwelcome touching or sexual advances to serious assault.
- The offer of rewards for going along with sexual advances, e.g. promotion, access to training.
- Continued suggestions for sexual activity or sexual inuendo after it has been made clear that such suggestions are unwelcome.
- Threats for rejecting sexual advances, e.g. suggestions that refusing advances will adversely affect the employee's employment, pay or promotion opportunities.
- Sending or displaying material that is pornographic or that some people may find offensive (including emails, text messages, video clips and images sent by mobile phone or posted on the internet).
- Unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless).
- Offensive emails, text messages or social media content.
- Questions or comments about a person's sex life.

Female Genital Mutilation (FGM)

FGM involves procedures that intentionally alter or injure female genital organs for non-medical reasons. The Female Genital Mutilation Act 2003 makes it illegal to practise FGM in the UK or to take girls who are British nationals or permanent residents of the UK abroad for FGM whether or not it is lawful in another country. It also makes it illegal to aid, abet, counsel or procure the carrying out of FGM abroad. There are no health benefits to FGM, and it is likely to cause severe immediate medical effects (such as bleeding, shock, wound infections, serve pain) as well as longer term medical consequences (such as abnormal periods, damage to the reproductive system including infertility, complications in pregnancy and newborn deaths). Longer term consequences also include psychological damage such as low libido depression and anxiety. FGM is a very complex issue and should be dealt with sensitively. Issues will likely involve a

number of agencies working together including specialist police officers, health and social care and education.

Forced Marriage

A forced marriage is a marriage in which one or both of the parties are married without their consent or against their will. It is recognised as a form of violence against women, men or children and is a serious abuse of human rights. A forced marriage differs from an arranged marriage where family members take the lead in choosing the partner but both parties are free to choose whether they marry the chosen partner or not. Forced marriage is illegal in England and Wales. The Anti-Social Behaviour, Crime and Policing Act 2014 made it a criminal offence from June 2014 to force someone to marry. In a situation where there is concern that an adult is being forced into marriage they do not or cannot consent to, there will be an overlap between action taken under the forced marriage provisions and the adult safeguarding process. In this case action will be co-ordinated with the police and other relevant organisations. The police must always be contacted in such cases as it involves a criminal offence and urgent action may need to be taken.

So Called Honour Based Violence

Honour based violence is a violent crime or incident which may have been committed to protect or defend the honour of the family or community. It is often linked to family members or acquaintances who mistakenly believe someone has brought shame to their family or community by doing something that is not in keeping with the traditional beliefs of their culture. For example, honour-based violence might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion.
- want to get out of an arranged marriage.
- want to get out of a forced marriage.
- wear clothes or take part in activities that might not be considered traditional within a particular culture.

Women and girls are the most common victims of honour-based violence however it can also affect men and boys. Crimes of 'honour' do not always include violence. Crimes committed in the name of 'honour' might include domestic abuse, threats of violence, sexual or psychological abuse, forced marriage, assault and/or being held against your will or taken somewhere you don't want to go.

Modern Slavery

Modern Slavery is a crime and a violation of fundamental human rights. Modern Slavery can take many forms including slavery, servitude, forced or compulsory labour and human trafficking. The underlying principle is the exploitation of a person or the coercion of a person to work against their will for the benefit of another.

Although human trafficking often involves an international cross-border element, it is also possible to be a victim of modern slavery within your own country. It is possible to be a victim even if consent has been given to be moved. Children cannot give consent to being exploited therefore the element of coercion or deception does not need to be present to prove an offence.

Radicalisation and Extremism

Radicalisation is the process by which a person comes to support terrorism and extremist ideologies that may lead them to commit acts of violence or reject the values of a democratic society, including tolerance and the rule of law. Extremism refers to the vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance for different faiths and beliefs

For more information relating to types of abuse in adults at risk, please refer to our Adults at Risk Policy.

6.3 COMMON SIGNS OF ABUSE

Every Vulnerable Person is unique, so behavioural signs of abuse will vary from persons to person. In addition, the impact of abuse is likely to be influenced by the person's age, the nature and extent of the abuse, and the help and support the person receives. However, there are some behaviours that are commonly seen in Vulnerable Persons who have been abused:

- The person appears distrustful of a particular adult, or a parent or a coach with whom you would expect there to be a close relationship.
- The person has unexplained injuries such as bruising, bites or burns, particularly if these are on a part of the body where you would not expect them.
- The person has an injury which is not explained satisfactorily or properly treated.
- A deterioration in the person's physical appearance or a rapid weight gain or loss.
- Pains, itching, bruising, or bleeding in or near the genital area.
- A change in the person's general behaviour. For example, they may become unusually quiet and withdrawn or unexpectedly aggressive. Such changes can be sudden or gradual.
- If the person refuses to remove clothing for normal activities or wants to keep covered up in warm weather.

For more information relating to signs of abuse in adults at risk, please refer to our Adults at Risk Policy.

6.4 ALLEGATIONS OF NON-RECENT ABUSE

Allegations of harm or abuse may be made some time after the event, e.g., by an adult who was abused as a child or by a member of Organisation Personnel who is still currently working with Vulnerable Persons. Where such an allegation is made, the Organisation will follow the procedures as detailed in this Policy and report the matter directly to the Police or Social Services.

Non recent abuse is the term used to refer to disclosures of abuse that were perpetrated in the past. It can also be about a disclosure of neglect, physical, sexual, or emotional abuse from someone who is now 18 years or over, relating to an incident that took place when the alleged victim was under 18 years old.

Allegations of abuse can be received by anyone and can be made against relatives, friends, carers, people in the public eye or in a position of trust, or any other person who currently has or previously had contact with Vulnerable Persons.

All concerns or disclosure relating to non-recent abuse must be reported to the CHOS or directly to the police. (including but not limited to, when the victim and/or perpetrator are deceased)

7. ONLINE SAFETY

It is essential that all children, young people, young players, and adults at risk in all groups including customers, supporters, participants and staff are safeguarded from potentially harmful and inappropriate online material and are aware of the potential dangers of being online including the use of social media.

It is also crucial that organisational personnel are aware of what constitutes appropriate behaviour in relation to social media use and online behaviours as well as understanding how their safeguarding responsibilities link to the online world. For more information on this please refer to the organisations I.T. Policy, Social Media and Media Policy and Employee Handbook.

We recognise the breadth of issues associated with online safety but understand that these can be categorised into four overarching areas of risk:

Content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

Contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

Conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and nonconsensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying.

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

The organisations have safety measure in place in relation to internet usage by young players and participants. Online content is filtered by our internet provider and is regularly monitored by the safeguarding team.

The organisations also provide opportunities for training for organisational personnel around online safety in the context of their safeguarding responsibilities. The Academy and the Foundation also take appropriate measures to educate young players and participants about online safety.

8. LOW LEVEL CONCERNS

It has been recognised by the Organisations that there is a need to manage issues that fall under the umbrella of safeguarding, yet which are of a minor nature. These matters are classified as 'Low Level Concerns'. Handling such concerns appropriately and proportionately will strengthen confidence of staff

and volunteers in the organisation. Any concern regarding low level concerns should be reported to the CHOS or appropriate DSO and should be recorded on the Electronic Case Management System in line with the normal process for managing Safeguarding issues.

What is a Low-Level Concern?

A low-level concern for this purpose is any concern, no matter how small and even if no more than a 'nagging doubt', that a person may have acted in a manner inconsistent with the Organisations' Codes of Conduct or simply – even if not linked to a particular act or omission – a sense of unease as to their behaviour. Low Level Concerns where no emergency actions are required, should be managed internally and recorded within the Electronic Safeguarding Case Management System. Low Level Concerns do not in any way override or replace the Organisations' 'Whistle Blowing Policy' but compliment and work alongside that process.

Examples of Low-level Concerns

- Staff error causing no/little harm, e.g., skin friction mark due to ill-fitting bib during football/PE session.
- Adult at Risk or child is spoken to in a rude or inappropriate way – respect is undermined but little or no distress caused.
- Being over friendly with children.
- Having favourites
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door when not part of their role.

9. WORKING WITH VULNERABLE GROUPS

9.1 GOOD PRACTICE

Abuse can occur in any context including home, school, work, or the footballing environment. Some individuals will actively seek employment or voluntary work with Vulnerable Persons in order to harm them. A coach, instructor, teacher, official or volunteer may have regular contact with Vulnerable Persons and be an important link in identifying situations where they need protection.

Abuse can take the form of physical, emotional, neglect and sexual abuse. Having knowledge of such abuse can result in strong and difficult emotions in those assisting a person affected by such abuse. It is important to understand these feelings and not allow them to interfere with your judgement about any reporting or action required.

Any concern regarding poor practice should be reported as outlined in this policy.

If it is brought to the attention of the organisations, that a Vulnerable Person participating in any activity has or may have been subject to abuse outside the footballing environment, we recognise that football can play a crucial role as part of a care plan or in improving their self-esteem. In such instances the respective Organisation will work with the referral agencies to ensure they receive the appropriate support.

Good Practice Guidelines

All personnel must demonstrate exemplary behaviour in order to safeguard Vulnerable Persons and report any concern about the welfare of a Vulnerable Person both in the best interest of the Vulnerable Person and to protect themselves from allegations. The following are examples of how to create a positive culture within the Organisations:

Good practice means always:

- promptly responding to any request to complete or update your DBS Criminal Records Check.
- promptly informing the HR Department in respect of any investigation, allegation or arrest which may impact your role in working with Vulnerable Persons.
- working in an open environment, for example, avoiding private or unobserved situations and encouraging transparency in communication.
- treating all people, including Vulnerable Persons, equally and with respect and dignity.
- putting the welfare of the individual before winning and achieving goals.
- maintaining a professional relationship with Vulnerable Persons, for example, never having an intimate relationship with a Child under 18 (even if they are over 16 years old) or an Adult at Risk (even if they are over 18 years old) for further information please open attached link below:

Preventing Abuse of Positions of Trust in Sport and Activity (CPSU)

- never taking advantage of a position of trust, control, or responsibility for those in your supervision, care, support, or coaching environment.
- building balanced relationships based on mutual trust which empowers Vulnerable Persons to share in the decision-making process.
- making football fun, enjoyable and promoting fair play.

9.2 POOR PRACTICE

The organisations along with relevant affiliated football partners take poor practice concerns seriously. Any concern regarding poor practice should be reported to the CHOS or appropriate DSO and should be recorded on the Electronic Case Management System.

Poor practice includes the following:

- Failure to adhere to Codes of Conduct, whether at the Academy, Foundation or elsewhere as part of the organisations work.
- When insufficient care is taken to avoid injuries to players or participants (e.g., by excessive training or playing or inappropriate training or playing for the age, maturity, experience, and ability of players or participants).
- Allowing abusive or concerning practices to go unreported (e.g., a coach who ridicules and criticises players or participants who makes a mistakes).
- Placing children or young people in potentially compromising and uncomfortable situations with adults (e.g., inappropriate use by a coach of social media with a young player or participant).
- Ignoring health and safety guidelines

- Failing to adhere to the values and behaviours expected in the organisations (e.g., openly verbally abusing a referee).
- Giving continued and unnecessary preferential treatment to individuals.

Practices To Be Avoided
The following should be **avoided** except in emergencies:

- Walking a child home.
- Taking Vulnerable Persons to their own home where they will be alone.
- Taking a child to alone in your own car.

If cases arise where these situations are unavoidable, they should only occur with the full knowledge and consent of either the Vulnerable Persons parent/guardian/carer or someone in a position of authority within the Organisations Safeguarding Team.

Practices Never To Be Sanctioned
The following should never be sanctioned. Organisational Personnel should never:

- Share a room with any Child (under 18).
- Engage in rough, physical, or sexual provocative games, including horseplay.
- Allow or engage in any form of inappropriate touching or language.
- Allow Vulnerable Persons to use inappropriate language unchallenged.
- Make sexually suggestive comments to a child.
- Take a vulnerable person to your home where you would be alone with them.
- Reduce a Vulnerable Person to tears as a form of control.
- Allow allegations made by a child to go unacknowledged, unchallenged, unrecorded, or not acted upon.
- Do things of a personal nature for Vulnerable Persons that they can do for themselves.

Organisation Personnel should avoid taking on any caring responsibilities for which they are not appropriately trained, and for which consent forms have not been obtained (where applicable).

It may sometimes be necessary for Organisation Personnel to do things of a personal nature for Vulnerable Persons, particularly if they are disabled. These tasks should only be carried out with the full understanding and consent of parents/guardians and the Vulnerable Person affected. Organisational Personnel must be responsive to a person's sensitivities and reactions. If a person is fully dependent on the member of Organisational Personnel, they must talk with him/her about what they are doing and give choices where possible. This is particularly so if they are involved in any dressing or undressing of outer clothing, if personal care is required, or where physical contact such as lifting or assisting to carry out particular activities are required. If organisational personal are required to help and support a vulnerable person (adult or child) they will receive the appropriate training. If Organisational Personnel are unsure on any of the issues in this section, they must check with the CHOS, DSO, with their Line Manager and with parents/guardian or carers. The CHOS or appropriate DSO should be able to assist with further information.

If any of the following occur Organisational Personnel should report this immediately to the CHOS, DSO or their Line Manager who will advise what to do next. Organisational Personnel should make a record of the incident on the Electronic Case Management System. The Safeguarding Team will assess the situation and decide how, when and by whom a parent is informed of the situation.

- If a child or young person is injured during an activity other than as a reasonably foreseeable injury resulting from the activity.
- If Organisational Personnel accidentally hurt a child or young person or observe another adult hurting a child.
- If a Vulnerable Person(s) seem distressed in any manner.
- If a Vulnerable Person appears to be sexually aroused by your actions.
- If a Vulnerable Person misunderstands or misinterprets something you have done.
- If there is a sudden change in behaviour, or the Vulnerable Persons behaviour becomes challenging, or they become withdrawn.

For more information on our response to poor practice, please see the raising concerns section of this policy.

9.3 POSITIONS OF TRUST

In accepting a role that involves working with Vulnerable Persons in any capacity within the Organisations, it is essential Organisation Personnel understand and acknowledge the responsibilities and trust inherent to the role.

As a result of their knowledge, position and the authority, all Organisation Personnel working directly with Vulnerable Persons are in positions of trust in relation to the Vulnerable Persons in their care. A position of trust is when one party has power and influence over the other by the virtue of their work or nature of the activity or role. It is vital for all those in such positions of trust to understand the power they are perceived to or may have over those in their care, and the responsibility they must exercise as a consequence. For further guidance please refer to the attached link

Preventing Abuse of Positions of Trust in Sport and Activity (CPSU)

Organisation Personnel have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. Appropriate professional boundaries must be maintained at all times. Any incident giving rise to concern should be reported in accordance with this Policy.

Any allegation or reported concern about the conduct of a member of Organisation Personnel will be managed by the relevant Organisation, and, if considered necessary, referred to the relevant Safeguarding Children's Board using their policy for dealing with allegations against a person who works with children. Allegations and concerns will be referred to the Local Authority Designated Officer (LADO) within 24 hours the allegation being made.

The organisations will notify the Premier League, FA and EFL (through the submission of the Affiliated Safeguarding Referral Form) of, and gives, the Premier League, FA and EFL information as they may require in relation to the submission.

9.4 STAFFING RATIOS

The Organisations follow guidance from the EFL, FA and NCPCC in relation to Safer Working Practice which includes operating procedures and minimum delivery ratios.

Children and young people

Any activity undertaken by the Organisations will be done so with the correct ratio of Organisation Personnel to children and young people based on the age of the children, the degree of risk the activity involves, and whether there are any additional needs for the group of participants. There will always be a minimum of two Organisation Personnel or service provider personnel to supervise an activity. Please note If Organisational personnel who are under 18 are helping to supervise younger children only people aged 18 or over should be included as adults when calculating adult to child ratios.

- For Children under 5 the recommended ratio should be no more than 1:6.
- For Children under 8 the recommended ratio should be no more than 1:8.
- For Children over 8 the recommended ratio is 1:10 but can vary depending on the activity

Children and young people in schools or colleges

When an activity is delivered in a school or college, by a member of Organisational Personnel then the Organisations will ensure adherence to the ratio set out in school or college policies and/or in line with statutory expectations.

Adults at Risk and adult participation in activities run by the organisations

Any activity undertaken by the Organisations will be done so with the correct ratio of Organisation Personnel to adults based on the degree of risk the activity involves, and whether there are any additional needs for the group of participants. There will always be a minimum of two Organisation Personnel or service provider personnel to supervise an activity.

- For adult participants the recommended ratio is 1:16 but can vary depending on activity.

Working 1:1

Working 1:1 with a Vulnerable Person should only be undertaken in exceptional circumstances (and under the approval of the Club Head of Safeguarding) or after a risk assessment has been put in place. This risk assessment may recommend 2:1 work, for work to only happen on an organisational site and will include information about transportation and any relevant risk factors. Risk assessments of this nature must be updated regularly.

9.5 COACHING CONTACT

As a coach in the organisations or person in a position of trust within the organisations with any form of coaching contact you must be aware that:

- Safeguarding and the welfare of our players and participants is an organisational priority. For example, protecting players and participants playing in extreme weather conditions either hot or cold by not taking appropriate precautions e.g. suncream or suitable clothing.

- If any form of manual/physical contact is required, it should be provided openly and according to Premier League, FA, or English Football League Guidance. Consent from players and/or parents should be always gained.
- Parents have differing opinions about manual support and physical contact for their children and their views should be considered.
- It is essential that you keep up to date with the technical skills and qualifications in football to the appropriate level.
- You must always ensure that coaches and Organisation Personnel work in pairs, particularly if there is a requirement to be in dressing rooms or undertake any personal care.
- All Organisation Personnel should be vigilant and ensure adults around Vulnerable Persons act in accordance with the standards set by the Organisations. Organisation Personnel are also responsible to monitor those who enter changing rooms, etc.
- They are responsible for ensuring that if mixed teams are taken away, they will always be accompanied by a male and female member of Organisation Personnel and that appropriate Organisation Personnel ratios are planned and maintained. Be aware that same gender abuse can also occur.
- They are responsible for ensuring that at tournaments or residential events, adults are not entering Vulnerable Persons rooms or invite Vulnerable Persons into their rooms.
- They must be an excellent role model – this includes not smoking, not drinking alcohol, not using drugs, or not using bad language in the company of Vulnerable Persons.
- When coaching, giving enthusiastic and constructive feedback recognising the development needs and capacity of Vulnerable Persons is essential – they should avoid excessive training or competition and must not push individuals against their will.
- They should secure parental/guardian/carer consent in writing to act, if the need arises, in emergency circumstances to give permission for the administration of medication or emergency treatment in line with the information advised on the relevant consent form for either of the organisations, which amended from time to time.
- They must obtain parental/guardian/carer consent in writing for taking photographs and/or video of any Vulnerable Person and provide information on how such footage is to be used.
- They must keep a written record of any injury that occurs, along with the details of any treatment given and/or action taken and advise parents/guardians/carers and the CHOS/DSO on any issue in relation to any treatment of Vulnerable Persons and to log such details on the organisations recording system.
- They must ensure safeguarding incidents are reported and logged on to the Electronic Safeguarding Case Management System.
- They must ensure that they request written parental consent if Organisation Personnel are required to transport Vulnerable Persons in Organisation vehicles. Transporting Vulnerable Persons in Organisation Personal's vehicles **should be avoided** unless necessary. If this does need to happen it should only be with the permission of the CHOS or where an individual risk assessment has taken place.

9.6 UNDER 18'S WITHIN A FIRST TEAM ENVIRONMENT AND ON WORK EXPERIENCE

Guidance for Accommodating

If an Academy Player or Young Professional under the age of 18 joins another club on trial, work experience or a Football League Youth Loan, the Academy will seek written parental/guardian consent (in addition to the standard consent sought at the start of every season) prior to the activity taking place. Consideration will also be given to the player's education programme, travel and accommodation

arrangements. If the new club is not located within a reasonable travelling distance from the player's current address MFC will insist that, where possible, players are placed in host family accommodation recruited by the receiving club in line with the relevant EFL guidance during their time away from MFC and not in hotel accommodation, and as good practice MFC should designate a member of Academy Staff to check on the Players on a regular (weekly) basis, not just for game situations but for their general welfare whilst on loan, trial or work experience. The receiving club will also undertake formal visits.

For players under the age of 18 who are joining the club on trial (including Work Experience) parental/guardian consent will be sought prior to the trial taking place, along with a full medical history and injury disclaimer. Where accommodation with a host family is required during the trial period, a matching form will be completed by the player to ensure they are placed with the appropriate host family. If the player's parent/guardian is also travelling with the player, then a local hotel may be used as an alternative. Transportation will be arranged during the trial period.

As players progress through the Academy system, they may have the opportunity to train and play with the adult provisions of the Club. This carries a number of safeguarding concerns as they will be entering an adult provision and be susceptible to adult behaviours and language. The Club will support the player(s) during this transition. Parents will be included, and consent sought.

In Middlesbrough Football Club's Women's Team, young female players that are 16 and above will be included in training and matchdays for both the First Team and Under 23 team. Safeguarding provisions will be put in place to ensure the safety and welfare of the players.

When players and organisational personnel are being transported by the organisations they must adhere to the Transport Policy including the safe use of seatbelts.

10. RESPONDING TO BULLYING

10.1. ORGANISATION APPROACH

The Organisations have a zero-tolerance approach to bullying and takes all complaints of bullying seriously in line with the Anti-Bullying and Harassment Policy and FA Anti Bullying Policy. Serious and prolonged bullying may lead to isolation. There have been some well publicised examples of Vulnerable Persons that as a result of bullying have developed suicidal thoughts or behaviour. Therefore, if there is a suicide concern, seek advice from the CHOS and DSO who may discuss the matter with the organisations Mental Health First Aid Team or the Club Doctor. The Organisations also provide a confidential advice line for all personnel.

The Anti-Bullying and Harassment Policy sets out the procedure which should be followed for suspicions or allegations of bullying or harassment. All settings in which Vulnerable Persons are provided with services or are living away from home should have rigorously enforced anti-bullying strategies in place.

We must consider why those who bully do so. Sometimes this kind of behaviour can be a symptom of something else. We must consider what life is like for them and whether things might not be good for them. We need to think about whether imposing a sanction will be enough to change behaviour. Do they need support. Encourage staff to be curious, think about what is going on for the bully, which may explain their behaviour, they may need someone safe to speak to, they may have a disclosure to make about their own experiences that needs support.

10.2 ACTION TO HELP VICTIMS AND TO PREVENT BULLYING

- Take all signs and complaints of bullying seriously.
- Encourage all Vulnerable Persons to speak and share their concerns.
- Help the victim to speak out and tell the person in charge of the activity.
- Create an open environment.
- Investigate all allegations and take action to ensure the victim is safe.
- Speak with the victim(s) and the bully(ies) separately.
- Reassure the victim(s) that you can be trusted and will help them, although you cannot promise to not tell anyone else.
- Keep records of what is said (what happened, by whom, when).
- Report any concerns to the CHOS or appropriate DSO, who may take further action such as informing schools or other agencies.

RESPONSE TO THOSE RESPONSIBLE FOR BULLYING

- Talk with the bully(ies), explain the situation, and try to get the bully(ies) to understand the consequences of their behaviour. If bullying is found to have occurred seek a resolution which satisfies the victim. This may include an apology to the victim(s).
- Inform the bully(ies) parents/guardian.
- Insist on the return of borrowed items and that the bully(ies) compensate the victim.
- Provide support for the coach or staff member working with the victim(s).
- Impose sanctions if necessary.
- Encourage and support the bully(ies) to change behaviour.
- Hold regular meetings with families (if appropriate) to report on progress of action taken.
- Inform all organisation members of action taken.
- Keep a written record of action taken.
- Remain vigilant following the disclosure/investigation.
- Record the outcome of the complaint.
- Ensure relevant staff are aware of the outcome and that they monitor the situation to reduce the chances of a re-occurrence.

11. MATCHDAYS AT THE RIVERSIDE STADIUM AND STOCKTON TOWN (MFC WOMEN ONLY)

11.1 MATCHDAY SAFEGUARDING

Safeguarding on matchdays is of paramount importance to the organisations. The organisations take their responsibility to ensure that our matches are a safe and enjoyable experience for all involved seriously, whether that is in the capacity of a spectator, player or member of organisation personnel. The Safeguarding Team on matchdays at the Riverside Stadium includes the CHOS, DSO's and Safeguarding Stewards, who have contact with the safety control room. Members of the Safeguarding Team are also in attendance at Stockton Town (Home of MFC Women). The Safeguarding Team also play an important role not only on matchdays but also in pre-event planning through risk assessments and pre match briefings. All organisational personnel receive a pre match briefing which includes safeguarding. All Safeguarding incidents and concerns are recorded on the Electronic Case Management System.

11.2 FLAG BEARERS AND TEAM MASCOTS

On matchdays, Flag Bearers and Team Mascots are supervised by experienced members of organisational personnel from the Foundation. Organisational personnel, with the support of the Safeguarding Team will ensure that all Flag Bearers and Team Mascots are briefed on what to do in the case of an emergency. They will also ensure the young people are appropriately dressed for the weather and occasion and that they feel and remain safe throughout their time in the organisations' care. At the end of the matchday experience those supervising will ensure safe and prompt repatriation to parents ahead of the match.

11.3 BALL RETRIEVAL (BALL CREW)

On matchdays, the Ball Crew are supervised by experienced members of organisational personnel from the Foundation. At every match day, a comprehensive verbal pre match briefing is delivered to the Ball Crew ahead of their deployment. This will include what to do in an emergency, safeguarding and the expectations of their role. Organisational Personnel with the support of the Safeguarding Team will undertake risk assessments pre match and undertake dynamic risk assessment throughout the game to ensure the safety, security and wellbeing of the Ball Crew.

11.4 LOST CHILDREN

If a child becomes lost in the stadium, organisational personnel will respond quickly and decisively to reunite a child with their parent/guardian or carer. The four corners of the stadium (3 for home supporters 1 for away supporters) are designated as meeting (or muster) points for missing children. If a child is found without an adult and they cannot be immediately reunited stewards or other organisational personnel will take the child to the meeting point and contact the CHOS and/or the Safety Control Room. If a parent/carer/guardian cannot find their child, they will be advised to go to or will be accompanied to the meeting point and contact will be made with the CHOS and/or the Safety Control Room. Parents/carers/guardians are encouraged to familiarise their children with the meeting points closest to their seat in the stadium.

11.5 KNOWN SEX OFFENDERS

The Organisations work closely with the police, probation service and local authorities including the Local Safeguarding Children Board (LSCB) in relation to child protection, and when concerns are raised the organisations take advice from the police, probation service and local safeguarding board as to the level of risk of any known sex offender who may have connections with the organisations as a supporter or visitor. The organisations reserve the right in conjunction with the police, probation service and other authorities to ban or suspend supporters who have been charged or convicted of any sexual offence or are on the sex offender's register. Any supporters who have been banned or suspended, who have been charged or convicted of any sexual offence, or are on the sex offender's register, will not have the right to appeal the ban or suspension.

11.6 STANDING IN SEATED AREAS

The Sports Ground Safety Authority (SGSA) publish guidance for clubs that sets out its approach to enforcing their all-seater policy in relation to persistent standing in seated areas. This guidance reminds clubs of their existing obligation to discourage supporters from standing but acknowledges that, in some cases, supporters will still choose to stand no matter what clubs do.

The EFL support the approach being taken by the SGSA but recognise that, providing the club introduce reasonable steps to discourage standing in seated areas, there is a reduced risk of regulatory action being taken. Consequently, MFC are developing and implementing a number of reasonable actions to encourage both home and away supporters to remain seated.

12. SAFER RECRUITMENT

The Organisations recognise the risk of potential abuse towards Vulnerable Persons and implement all reasonable measures in the recruitment process to prevent unsuitable people from working with Vulnerable Persons.

Pre-Employment Checks

When undertaking pre-employment checks the following are applied:

- Applicants who will work with Vulnerable Persons complete an MFC/Foundation application form. This application form collects information about the applicant's past and self-disclosure (relevant to the role) about any criminal record or involvement with the Police
- Consent is obtained from an applicant to seek information/or an application from the Disclosure Barring Service (DBS).
- Applicants who are applying for jobs in regulated activity are asked questions related to safeguarding at interview.
- All applicants offered a position which involves working directly with Vulnerable Persons are required to undertake an enhanced DBS check and supply two references in writing. No open references will be accepted unless confirmed through telephone contact.
- Any gaps in employment are questioned and investigated.
- Photographic evidence of identity is obtained.
- Proof of eligibility to work in the UK is obtained.
- Checks are made with The FA to ensure the person is not suspended from football.
- All DBS outcomes are considered against the role being applied for; a DBS with convictions, does not necessarily mean that employment will be rejected however a risk assessment will need to be completed.
- Individuals who have a criminal record are treated fairly in relation to any job application at the respective Organisation and will not be discriminated against because of a conviction or other information brought to our attention.
- If information is received that may prevent an offer of employment being made or a volunteer being engaged by the organisations, the individual is notified of the decision in writing.

All employment offers are subject to the outcome of the screening process and when applicable, this is set out in their Offer of Employment. Until such time as a satisfactory DBS certificate and two references have been received, the applicant will not commence employment.

Recruitment and retention of ex-offenders

The Organisations are committed to equality of opportunity for all job applicants and aims to select people for employment on the basis of their individual skills, abilities, experience, knowledge and, where appropriate, qualifications and training. The Organisations will therefore consider ex-offenders for employment on their individual merits and suitability for the role applied for. This approach may differ however, depending on whether the job is or is not exempt from the provisions of the Rehabilitation of Offenders Act 1974.

Jobs covered by the Rehabilitation of Offenders Act 1974

Neither Organisation would automatically refuse to employ a particular individual just because they have a previous criminal conviction. During the recruitment process, the applicant will be asked to disclose any unspent convictions but will not be asked about, not expected to disclose, spent convictions. If an applicant has a conviction that is not spent and if the nature of the offence is relevant to the job for which they have applied, the Organisations will review the individual circumstances of the case and may, at its discretion, decline to select the individual for employment.

Jobs that are exempt from the Rehabilitation of Offenders Act 1974

If the job into which the Organisation is seeking to recruit is one of the excluded jobs listed in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 or the Rehabilitation of Offenders Act 1974 (Exclusions and Exceptions) (Scotland) Order 2013, the Organisations will require the applicant to disclose all convictions, whether spent or unspent (other than where protected cautions and protected convictions do not need to be disclosed, depending on the job concerned). Even in these circumstances the Organisations will not refuse to employ a particular individual unless the nature of the conviction has some relevance to the job for which the individual has applied.

Furthermore, if the job is exempt, the Organisations will, once it has selected the person to whom it wishes to offer employment, seek documentary evidence about that person's criminal convictions. The Organisations will seek the applicant's agreement to make a joint application to the Disclosure and Barring Service (DBS) for a standard, enhanced or enhanced with DBS barred lists check (as appropriate). The Organisations will reimburse the individual the fee for obtaining the appropriate criminal records certificate. Where the individual is member of the DBS update service, the Organisation will, with their permission, carry out a status check on any current certificate.

Disclosure and Barring Service

Middlesbrough Football Club is registered with the Disclosure and Barring Service (“DBS”) under the umbrella body of the Premier League and EFL to run checks on behalf of the organisations. The DBS provides a disclosure service for employers to undertake more thorough recruitment and selection procedures for positions which involve working directly with Vulnerable Persons.

All Organisation Personnel holding a DBS will be rechecked every 3 years.

If the DBS of a member of Organisation Personnel expires, we will complete a risk assessment before allowing them to continue with their duties.

Please see Recruitment & Selection Policy for further detail on safer recruitment and selection and the DBS procedure.

13. TEMPORARY STAFF, EXTERNAL CONSULTANTS AND SUBCONTRACTORS

All temporary staff (employed or voluntary), external consultants and sub-contractors are required to sign a Self-Declaration Form prior to commencement. They will not have unsupervised access to Vulnerable Persons during their employment or engagement unless a DBS Check has been undertaken by Middlesbrough Football Club on behalf of the Organisations.

A Service Level Agreement will be in place with sub-contractors which outlines their Safeguarding Responsibilities and compliance with this Policy.

Safeguarding – Sub-Contractor's Obligations
The Organisations responsibility to safeguard the welfare of all Vulnerable Persons when they are participating in activities run by the Organisations applies whether internally run or provided with an external service provider. The priority is always to provide a safe environment in accordance with safeguarding policies and procedures. Agreements setting out safeguarding responsibilities and expectations of all parties must be in place with all service providers. Service Level Agreement will (as applicable):

- express safeguarding obligations and responsibilities.
- include reporting procedures in the event of a safeguarding concern arising.
- Include clear guidance on the reporting of safeguarding concerns or concerns regarding poor practice during and outside of normal office hours.
- include name and contact details of Organisation Personnel to whom safeguarding concerns, or concerns regarding poor practice, should be reported.
- include obligation to undertake safer recruitment procedures.
- include obligation to undertake appropriate level DBS checks and self-declarations of their personnel delivering services under the agreement.
- express provision on the level of supervision to be provided by the partner during the activity.
- include a requirement for service providers to hold valid public liability and employer's liability insurance.
- Include details of safeguarding training undertaken by service provider personnel.
- Include who has responsibility for completion of consent forms (e.g., Medical and image consent), registration, record keeping and risk assessments.
- include details of First Aid arrangements.
- include evaluation procedures in place to gain the Vulnerable Persons views about the activity.

- Include the period by which the safeguarding arrangements in the agreement will be reviewed.

14. STAFF TRAINING

The Organisations have produced a Workforce Development Plan which includes safeguarding training as mandatory for all Organisation Personnel who are in direct contact with Vulnerable Persons. This includes match day and non-match day Organisation Personnel.

All Organisation Personnel receive a safeguarding induction as part of their HR induction.

Organisational personnel working in regulated activity will receive an enhanced safeguarding induction from either the CHOS or a DSO. This will be tailored to their area of work and responsibility.

Changes in policies and procedures will be communicated and all Organisation Personnel will receive annual refresher training.

15. DATA PROTECTION

15.1 DATA PROTECTION

MFC or the Foundation (as applicable) will be the Data Controller for information provided to either organisation.

When recruiting, MFC or the Foundation, as applicable, will be the Data Controller for information collected about applicants from a third party as part of the recruitment process for the position for which they have applied. The Organisation will process information about the applicant to perform checks on their employment, to verify the information they have provided and to conduct necessary background investigations for the purpose of pre-employment checks and contract formalities.

The Organisations take data protection seriously and only process data in accordance with the *UK GDPR, Data Protection Act 2018 and EU GDPR (if applicable) (the "Data Protection Legislation")* and its respective Privacy Notice, a copy of which is available at www.mfc.co.uk and www.mfcfoundation.co.uk or the Data Protection Officer.

15.2 GUIDELINE FOR THE USE OF PHOTOGRAPHIC FILMING EQUIPMENT

Some people have used sporting events as an opportunity to take inappropriate photographs or film footage of Vulnerable Persons. All Organisation Personnel must be vigilant and report any concerns to the CHOS or appropriate DSO.

The Organisations have relevant policies and consent forms in place and engage official photographers, to take all photos on behalf of the Organisation. Written parental/guardian consent must be sought prior to any child or young person in the care of either Organisation being photographed or filmed. Consent can be withdrawn at any time by contacting the Organisation. Any observers will be asked not to photograph or film. Please refer any queries or concerns to the CHOS or relevant DSO.

The organisations have a zero-tolerance approach to the taking of inappropriate photographs of both its male and female players whether they are under 18 or part of the Senior squads.

15.3 CONFIDENTIALITY

The Organisations operate on the premise that all personal information imparted to Organisation Personnel is to be treated in confidence. Trust and confidence are key to the Vulnerable Persons who may trust a member of Organisation Personnel with issues of a personal nature, and, wherever possible their confidences should be respected.

Organisational Personnel must not make promises on confidentiality they may be unable to keep and should always make any complainant fully aware of any situation where confidentiality must not be maintained, as in a case of a concern for the protection of Vulnerable Persons or the welfare of anyone involved.

Vulnerable Persons may disclose information that is difficult for the recipient to deal with without further advice/support, or which must be reported to statutory agencies. In this case the discloser should be told that the situation will be discussed with the CHOS or DSO with a speciality in that area, or with the Line Manger, but confidentiality will be maintained if possible.

15.4 INFORMATION SHARING

The Organisations are committed to sharing information for the purposes of safeguarding and promoting the welfare of Vulnerable Persons including children and young people in line with *Working Together to Safeguard Children (2023)*

Every effort should be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a need-to-know basis only. This includes (but is not limited to) the following people:

- CHOS/DSOs
- The parents/carers/guardian of the person who is alleged to be abused (only with guidance from statutory agencies)
- The person making the allegation
- Social Services/Police
- BLSSM/Chief Executive
- Data Protection Officer
- Media Department
- Department Head/Direct Line Manager
- The alleged abuser (and parents if the alleged abuser is a child)

Seek Police and Social Services advice on who should approach alleged abuser.

16. RAISING AND RESPONDING TO CONCERNS

16.1 RAISING CONCERNS

It is not the responsibility of Organisation Personnel to decide whether or not information or concerns they have are evidence of harm or abuse, however they do have the responsibility to report all concerns

and information around low level concerns, poor practice, suspected abuse and other safeguarding concerns and information. Remember safeguarding is everyone's responsibility. Organisational personnel must act on any concerns through contact with the Safeguarding Team and, if applicable, appropriate authorities.

If a vulnerable person is a matter for concern or making a disclosure (or someone is doing so on their behalf) please:

- Ensure the immediate safety of the Vulnerable Person involved (this may involve getting them to hospital).
- Reassure the Vulnerable Person and take what they say seriously.
- Do not make any promises not to tell.
- Keep questions to a minimum, use them to clarify what you have been told.
- Make a full record of what was said, seen or heard.
- Maintain confidentiality on a need-to-know basis only.

If you have a concern or a disclosure has been made, you must report this immediately to either an appropriate DSO or the CHOS. Safeguarding ambassadors can also act as a point of contact for advice about concerns or to report an immediate concern. Safeguarding Ambassadors may take immediate action but must also promptly pass on any concerns to an DSO or the CHOS.

- If the concern relates to a Safeguarding Ambassador, please alert the appropriate DSO.
- If the concern relates to a DSO, please alert the CHOS.
- If the concern relates to the CHOS, please alert the BLSSM
- If you do not know who to turn to for advice or are worried about sharing your concerns with a senior colleague, you should contact the Social Services direct or the NSPCC on 0808 800 5000 or Childline on 0800 1111.

If in exceptional circumstance no one in the safeguarding structure from the organisations is available, then report your concerns to either the County Football Association's Welfare Officer or the FA/the English Football League/Premier League or Premier League Charitable Fund Lead DSO as appropriate. If unavailable, then report your concerns direct to Children's Services or the Police if you feel the child is in danger or at risk.

Once a concern is reported it should then be recorded appropriately on the Electronic Case Management System as soon as is practicably possible but no later than 24 hours after the incident, disclosure or concern arose. For organisational personnel without direct access (for example volunteers) a universal safeguarding report form will be completed and sent securely to the CHOS or appropriate DSO.

The report could be shared with other professionals, parents/guardians/carers, or the vulnerable person themselves so keep reports clear, concise, and professional. Information may also be passed on to Social Services, or the Police therefore it must be as helpful as possible, hence the necessity for making a detailed record at the time of the disclosure/concern or as close to as possible. Information shared with the safeguarding team should include where possible the following:

- Full name of vulnerable person and person(s) involved.
- Age and date of birth vulnerable person and person(s) involved.

- Contact details such as home address and telephone number or information about their school or education setting.
- Where the concern is from and is the person making the report expressing their own concerns or those of someone else.
- Background/context to concern – risks/vulnerabilities/protective factors
- Area of the organisations involved if applicable including programme/event involved in if in the Foundation.
- Nature of concern/signs/injuries
- A description of any visible bruising or other injuries, behavioural signs, indirect signs if applicable
- Factual account of what you know.
- Witnesses
- Vulnerable Persons account – record exactly in "..." and do not censor.
- State whether consent was sought/was the child/young person made aware you were passing the concern on.
- Have the child/young person's parent or carer been contacted and what did they say.
- What has been said to the Vulnerable Person if it is not them making the report, has the vulnerable person concerned been spoken to? If so, what was said?
- Has anyone been alleged to be the abuser? Record details.
- Details of other people/agencies consulted or involved with the person.
- Action taken and any advice given to you by DSO/CHOS or from you to vulnerable person.
- Who you are and what is your job role.
- Location of incident
- Date and time of incident

In the case of a low-level concern try to be as detailed as possible using the information above as a guide.
In the case of a crime being committed, for example an assault or abuse, please make sure you contact the Police immediately and then Social Care where applicable. Ensure the following information is collected where possible:

- Parent/guardian/carers name if applicable
- Who else lives in the household
- GP details
- Police reference number

Once concerns have been reported and recorded, please remember to:

- Keep a record of the name, role of the officer or Organisation Personnel to whom the concerns were passed to and recorded; include the date and time of the referral.
- Ensure you do not share the information with anyone else unless instructed, for example parents/guardians/carers, colleagues, or other Organisation Personnel. However, you may need some support yourself and you should discuss this with either the Head of HR, the CHOS or relevant DSO.
- Ensure the CHOS or appropriate DSO follows up with Social Services.

16.2 RESPONDING TO LOW LEVEL AND SAFEGUARDING CONCERNS

All concerns including low level concerns will be taken seriously by the organisations. The Safeguarding Team will assess, investigate, and respond to concerns and will record these responses on the Electronic Case Management System.

In some cases, concerns will be dealt with internally for example through our Codes of Conduct procedures.

In other cases, multi-agency work may be relevant in relation to specific vulnerable persons for example working with social workers, early help, or medical professionals.

If there is any suspicion that a Vulnerable Person has been harmed or abused the CHOS or appropriate DSO will take such steps as considered necessary to ensure the safety of the Vulnerable Person in question and any others who may be at risk.

The CHOS will refer the allegation to the Social Services Department who may involve the Police or alternatively go directly to the Police if out of hours. Referrals to the Police and Children's Services should be confirmed in writing within 24 hours, if unable to within this timescale, then at the earliest opportunity.

Contact with the parents/guardian or carers of the Vulnerable Person will be discussed with the appropriate authorities and a decision will be made about the most appropriate organisation to make contact with the parents/guardian or carers of the Vulnerable Person in order to inform them of any disclosure if appropriate. This will be done as soon as practicable after discussion with the appropriate authorities.

The CHOS or DSO should also notify the BSSM and the FA/Premier League/ English Football League Safeguarding Lead. The Media Department will also be informed, in line with the Football Media Protocol, in order that they can deal with any media enquiries in conjunction with the BSSM.

If you remain concerned that sufficient action has not been taken, you should go directly to the NSPCC helpline, Children's Services, or the Police.

As the organisations work across a wide geographical area care must be taken to ensure that concerns are raised with the appropriate authority and/or agencies in that area and the area which the Vulnerable Person lives. Please see details in the useful contacts section below for information about specific local services.

16.3 RESPONDING TO CONCERNS ABOUT RADICALISATION AND EXTREMISM AND PREVENT DUTY

As part of our duties under the Prevent strategy, we take seriously any concerns that someone may be vulnerable to radicalisation or extremist influence. Organisational Personal undertake training in recognising the signs of radicalisation and extremism and their responsibilities under the Prevent Duty. If concerns arise, they should be immediately referred to the CHOS, who will assess the situation and, if necessary, engage with appropriate safeguarding or Prevent professionals.

16.4 RESPONDING TO SUSPICIONS AND ALLEGATIONS ABOUT ORGANISATIONAL PERSONNEL AND VOLUNTEERS

Anyone reporting, in good faith, a concern that a colleague is, or may be harming or abusing a Vulnerable Person, will be fully supported, and protected in accordance with the Whistle Blowing Policy.

Where there is a complaint against a member of Organisation Personnel one or more of three types of investigation (internal and external) may apply:

- A criminal investigation
- A safeguarding investigation
- A disciplinary or misconduct investigation

The results of the criminal and safeguarding investigation will be taken into account for the disciplinary investigation and/or any required actions.

16.4 POOR PRACTICE

If the allegation is about unacceptable behaviour the CHOS or DSO will deal with it as a misconduct issue in line with the respective Organisations Disciplinary Procedures.

If the allegation is about unacceptable behaviour by the CHOS or DSO, or if the matter has been handled inadequately and the complainant is not satisfied with the outcome, it should be reported to Helena Bowman (BSSM) who will discuss with appropriate management and decide how to deal with the allegation and whether or not to initiate disciplinary proceedings.

All cases will be dealt with in line with the relevant football bodies disciplinary process and their safeguarding policies where applicable.

If concerns are in relation to Grassroots clubs using organisational facilities the relevant DSO or CHOS will alert County FA of our concerns. If the concern is in relation to the professional game or activity of the organisations governed in line with the professional game, then the CHOS will send a referral to The FA Safeguarding Team where repeated poor practice incidents occur.

The FA will then assess whether the matter needs to be dealt with by the Safeguarding Team or can be dealt with by the Club or County FA. To avoid doubt a referral needs to be made where there are three incidents of poor practice by the same individual.

The judgement about whether an incident is one of abuse or poor practice may not be able to be made at the point of referral, but only after the collation of relevant information. The majority of poor practice concerns will be dealt with by the grassroots or the organisations, or alternatively with support and guidance from The Premier League or English Football League as appropriate, or the County FA.

Referrals

If a referral is needed, it should be made by completing an 'Affiliated Football Referral Form' and sent to The FA Safeguarding Team or County FA (depending on level of risk assessed) within 24 hours. Referrals can be made over the phone, but a written referral needs to be sent within 24 hours. If the case is assessed to be high risk, the referrer needs to consider whether statutory agencies (LADO or Police) should be contacted, LADO referral is within 1 working day. To avoid doubt, if a Vulnerable Person is in imminent risk of harm the Police need to be contacted immediately. A referral to The FA Safeguarding Team should follow within 24 hours.

The FA/Premier League/English Football League Safeguarding Team, the CHOS and the County FA Welfare Officer will update each other (at least) every eight weeks, if the concern relates to an individual in a paid position, and (at least) every 12 weeks, if the position is not paid. Updates will include when a case is opened, closed or when there is a change in risk assessment.

Strategy Meetings

When a Strategy Meeting is held, The FA Safeguarding Team is usually represented by the County FA Welfare Officer. If the participant being investigated is employed by the Organisation, The FA Safeguarding Team and the CHOS will discuss who attends the Strategy Meeting.

Suspensions

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

For further details of The FA process of investigation and decision making (including the appeals process) please refer to The FA's Safeguarding Rules and Regulations available on www.theFA.com

16.4 SUSPECTED ABUSE

If there is any suspicion that a Vulnerable Person has been harmed or abused by a member of Organisation Personnel, the CHOS or appropriate DSO will take such steps as considered necessary to ensure the safety of the Vulnerable Person in question and any others who may be at risk.

The CHOS will refer the allegation to the Social Services Department who may involve the Police, or alternatively go directly to the Police if out of hours.

Contact with the parents/guardian or carers of the Vulnerable Person will be discussed with the appropriate authorities and a decision will be made about the most appropriate organisation to make contact with the parents/guardian or carers of the Vulnerable Person in order to inform them of any disclosure. This will be done as soon as practicable after discussion with the appropriate authorities.

The CHOS or DSO should also notify the BSSM and the FA/Premier League/ English Football League Safeguarding Lead. The Media Department will also be informed, in line with the Football Media Protocol, in order that they can deal with any media enquiries in conjunction with the BSSM.

If the CHOS is the subject of the suspicion/allegations, the report must be made to the BSSM who will refer the allegations to Social Services.

Internal Enquiries and Suspension

The CHOS (or appropriate DSO for the relevant area) will make an immediate decision in conjunction with the BSSM about whether any individual accused of harm, inappropriate behaviour or abuse should be temporarily suspended pending further Police and Social Services inquiries. If suspension is agreed as the best course of action, this must be done in line with the Company disciplinary procedures. The Head of HR will issue appropriate paperwork.

The FA/PL/EFL should be informed of any serious safeguarding concern or complaint in order that they may consider the risk posed across football.

Irrespective of the findings of the Social Services, Police or FA enquiries, the Head of HR in conjunction with the BSSM, will assess all individual cases to decide whether a member of staff or volunteer can be reinstated and how this can be sensitively handled. This may be a difficult decision, particularly where there is insufficient evidence to uphold any action by the Police. In such cases, the BSSM, Chief Executive and Head of Safeguarding must reach a decision based upon the available information which could suggest

that on a balance of probability, it is more likely than not that the allegation is true. The welfare of Vulnerable Persons should always remain paramount.

Support to deal with the aftermath

Consideration should be given to what support may be appropriate to Vulnerable Persons, parents/guardians/carers, and Organisation Personnel. Use of help lines, support groups and open meetings will maintain an open culture and help the healing process. The British Association for Counselling and Psychotherapy Directory is available from:

The British Association for Counselling and Psychotherapy
Tel: 01455 883300
e-mail:
bacp@bacp.co.uk
Internet:
www.bacp.co.uk

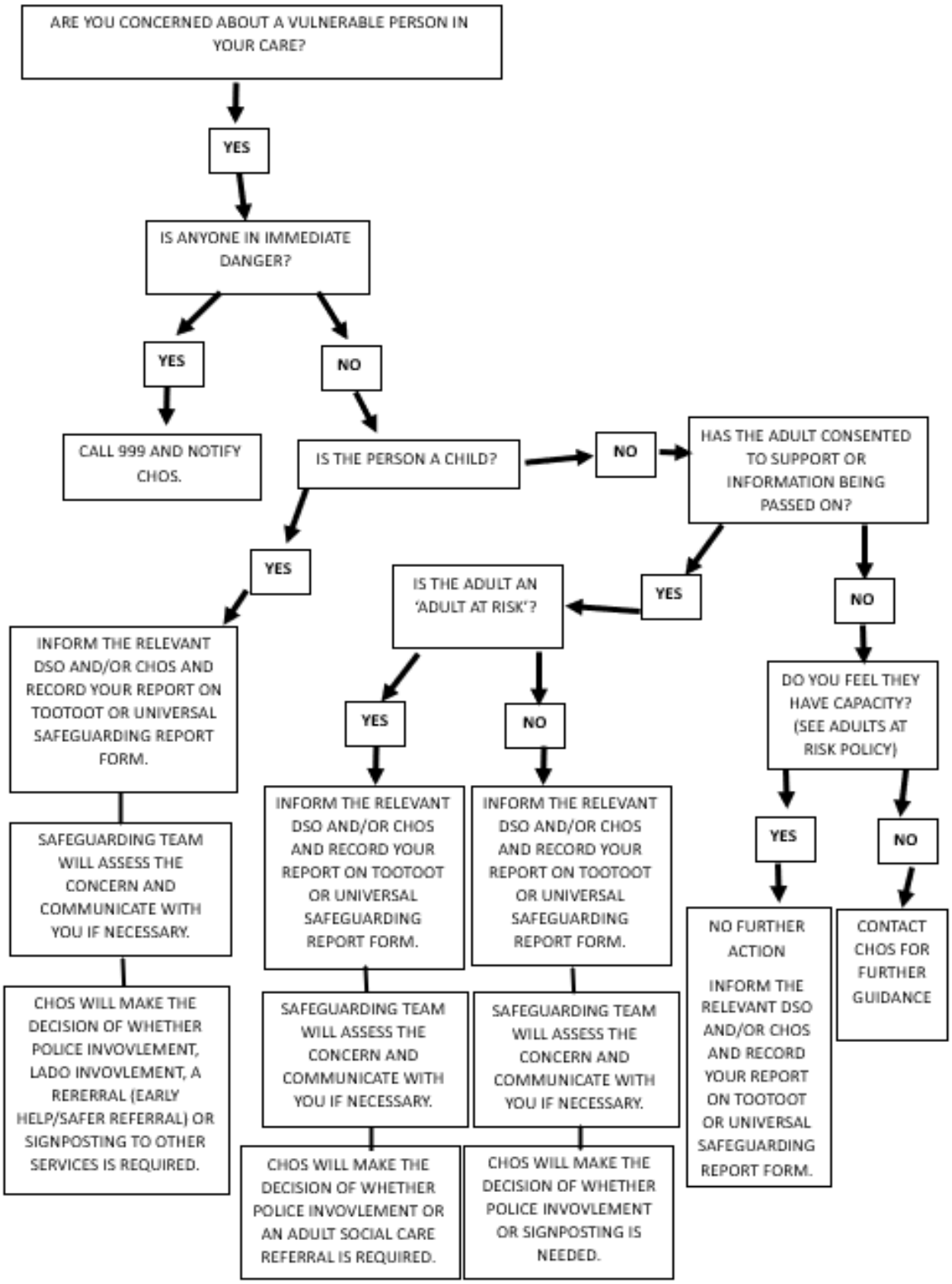
Consideration should be given to what support may be appropriate to the alleged perpetrator of the abuse.

Social Services can signpost Vulnerable Persons and their families to support services within the community so can be consulted for advice.

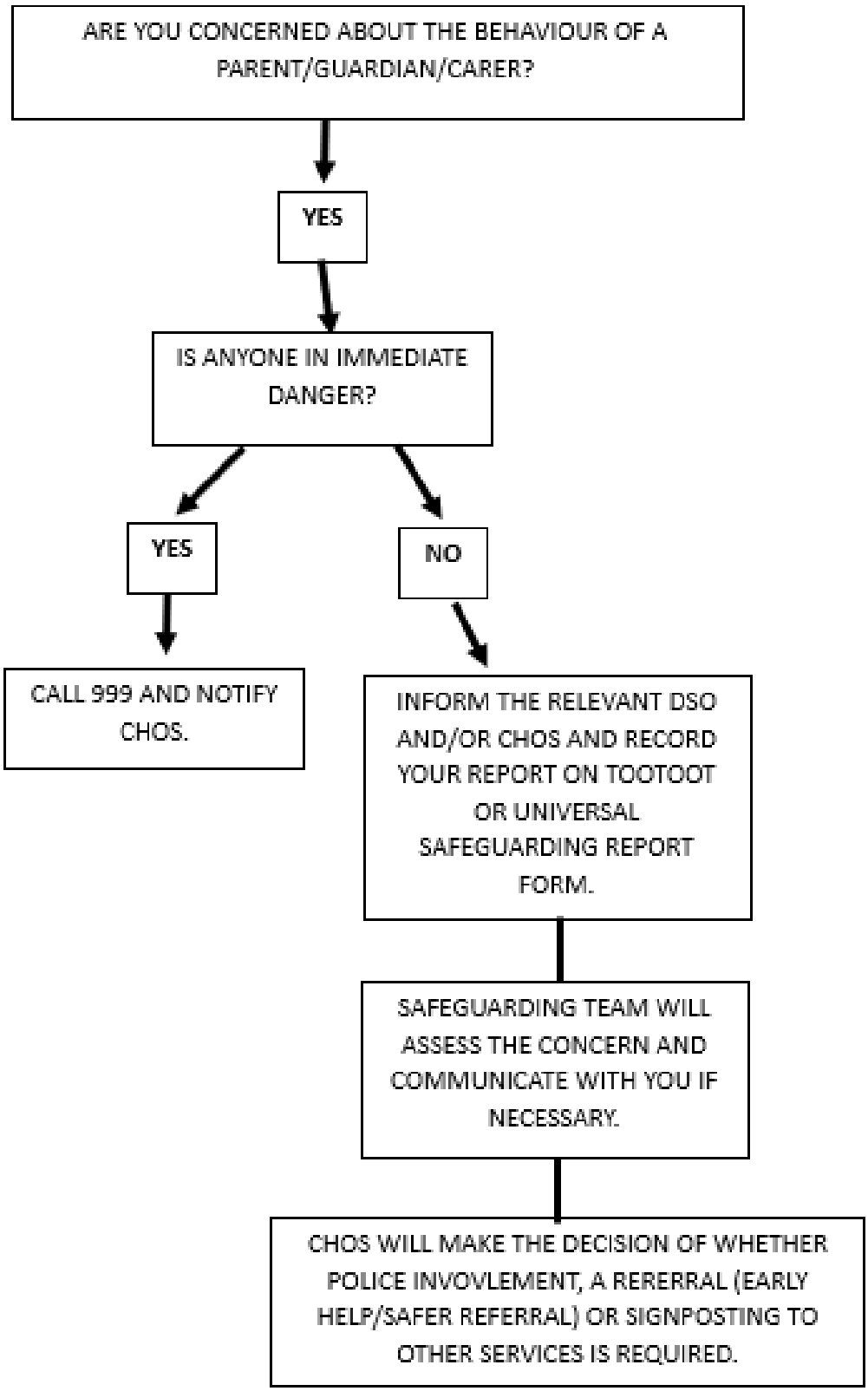
For organisational Personnel support is offered through the organisations Employee Assistance Programme, which is supplied by Health Assured. They can be contacted 24 hours a day on their confidential helpline: 0800 0280199.

17. PROCEEDURE FLOWCHARTS

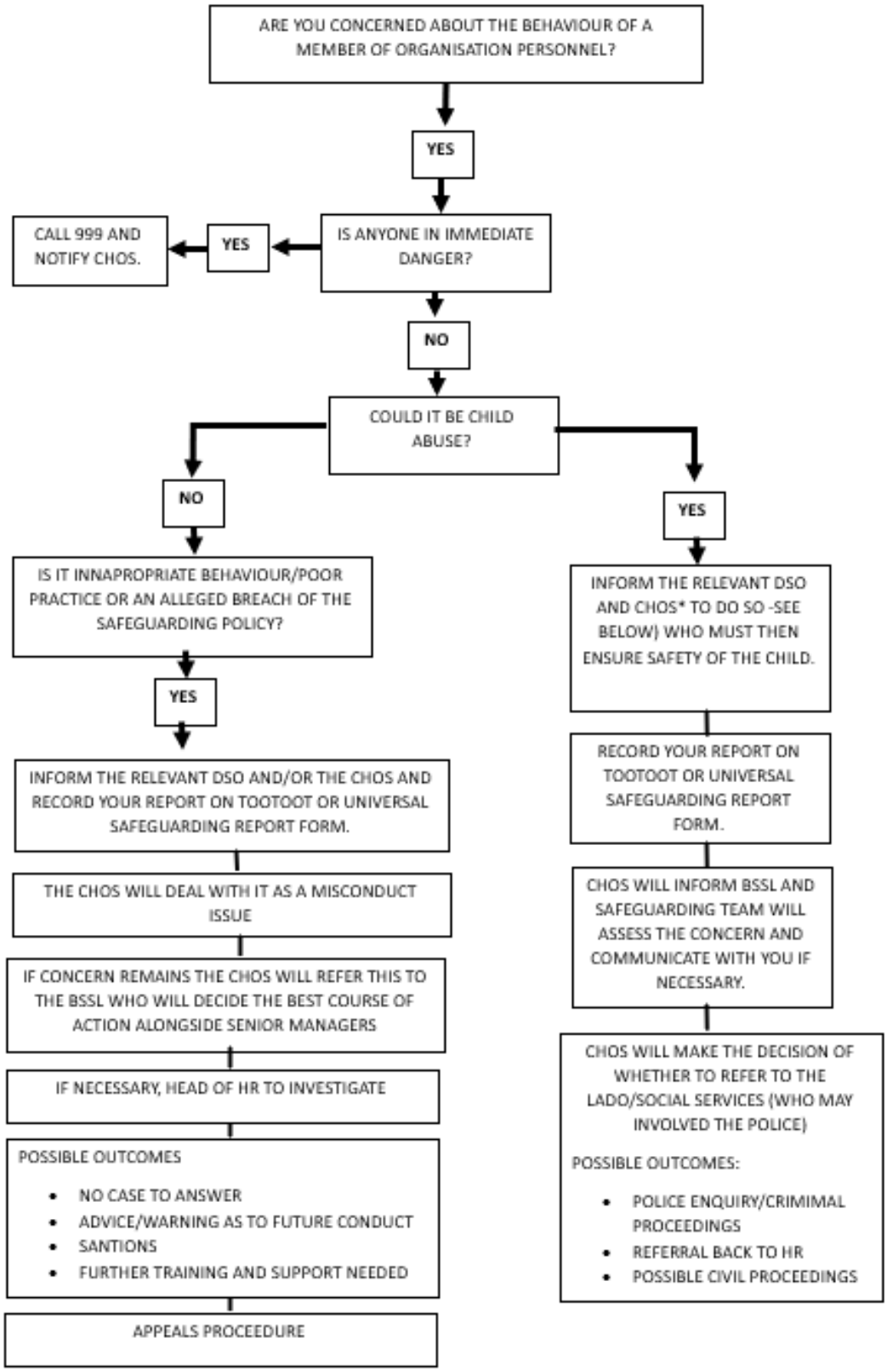
17.1 CONCERNS ABOUT A VULNERABLE PERSON IN YOUR CARE



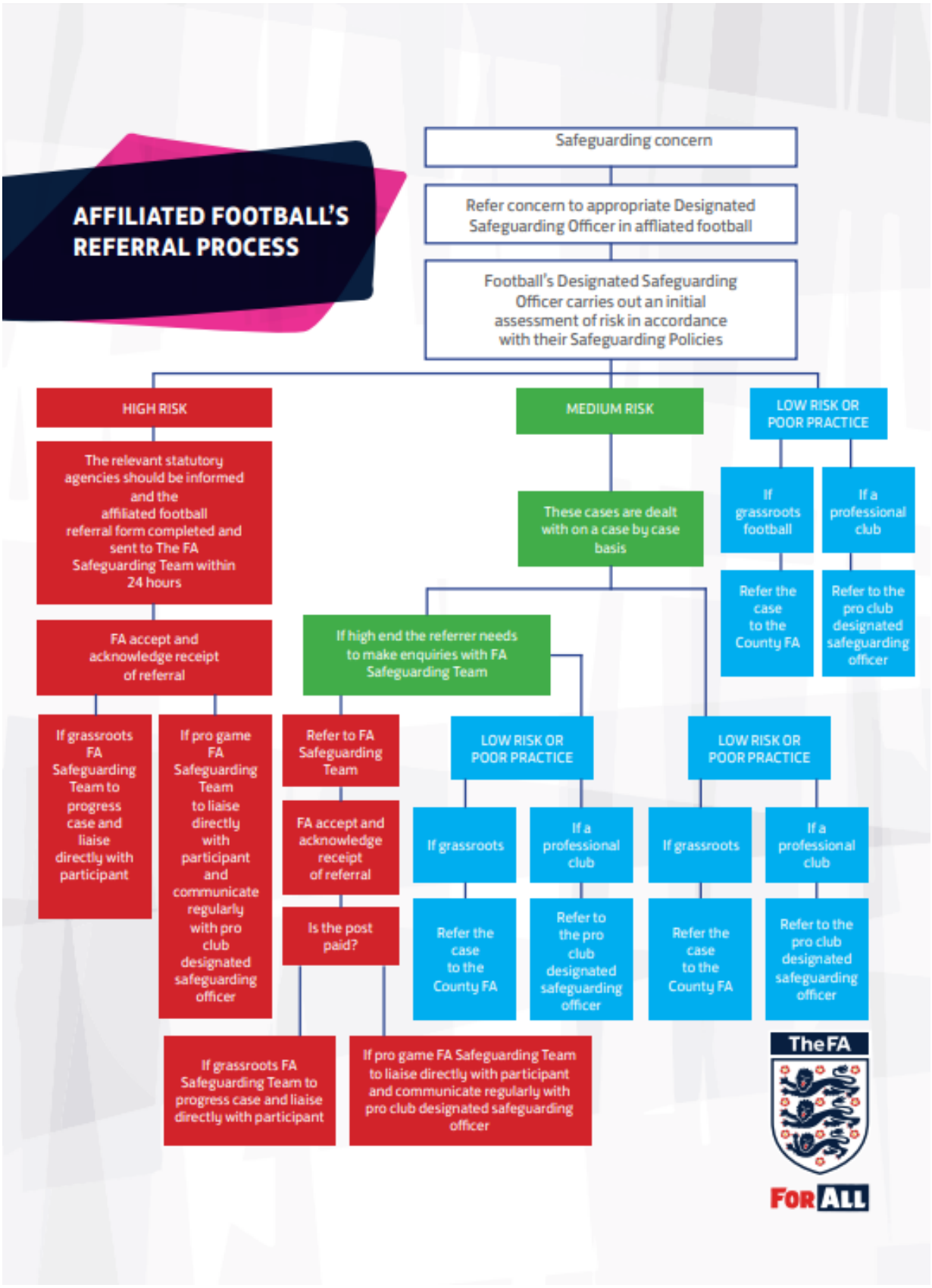
17.2 CONCERNS ABOUT A PARENT/CARER/GUARDIAN



17.3 CONCERNS ABOUT A MEMBER OF ORGANISATIONAL PERSONNEL



17.4 REFERRAL PROCESS FOR AFFILIATED FOOTBALL



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18. LINKED POLICIES

This Policy should be read in conjunction with other Organisational policies as well as Premier League and EFL related policies. These include but are not limited to:

EFL SAFEGUARDING STANDARDS

EFL MATCHDAY GUIDANCE

SAFER RECRUITMENT AND SELECTION POLICY

STAFF INDUCTION PROCESS

EQUAL OPPORTUNITIES POLICY

HEALTH AND SAFETY POLICY

IMAGES POLICY

MASCOTS POLICY

SOCIAL MEDIA AND MEDIA POLICY

WHISTLEBLOWING POLICY

PRIVACY STANDARD

CODES OF CONDUCT

LATE COLLECTION POLICY

TRANSPORT POLICY

TRIPS, TOURS AND TOUNAMENTS POLICY

ANTI BULLYING AND HARASSMENT POLICY

MODERN SLAVERY POLICY

SEXUAL HARASSMENT POLICY

19. USEFUL CONTACTS, LEGISLATON AND GUIDANCE

19.1 USEFUL CONTACTS

Local

Tees Safeguarding Children Partnerships' Procedures

https://www.teescpp.org.uk/

South Tees Safeguarding Children Partnership

https://stscp.co.uk/

South Tees LADO
Joanne Dickson
Email: joanne.dickson@middlesbrough.gov.uk
Joanne.dickson@redcar-cleveland.gov.uk

Middlesbrough Muti Agency Hub

Children

Tel: 01642 726004 during working hours: Monday to Thursday 8.30am – 5pm & Friday 8.30am – 4.30pm

Out of hours: Emergency Duty Team Tel: 01642 524 552

Email: MiddlesbroughMACH@middlesbrough.gov.uk

Online: https://www.teescpp.org.uk/contact/middlesbrough - via the safer referral form

Adult Social Care Team.

Tel: 01642 065070 Monday to Thursday 8:30am to 5pm, Friday 8:30am to 4:30pm

Email: adultaccessteam@middlesbrough.gov.uk

Out of hours: Emergency Duty Team on 01642 524 552

Redcar and Cleveland Muti Agency Hub

Children

Tel: 01642 130700 during working hours: Monday to Thursday 8.30am – 5pm & Friday 8.30am – 4.30pm

Email: RedcarMACH@redcar-cleveland.gov.uk

Online: https://www.teescpp.org.uk/contact/redcar-cleveland - via the safer referral form

Out of hours: Emergency Duty Team Tel: 01642 524 552

Adults

Tel:01642 771500 during working hours: Monday to Thursday 8.30am – 5pm & Friday 8.30am – 4.30pm

Email: AccessAdultsTeam@redcar-cleveland.gov.uk

Outside of office hours please call 01642 524552

Hartlepool and Stockton-on-Tees

Hartlepool and Stockton-on-Tees Safeguarding Children Partnership

Tel: 01429 284284 (Hartlepool) 01642 130080 (Stockton-on-Tees) during working hours: Monday to Thursday 8.30am – 5pm & Friday 8.30am – 4.30pm

Email: HSSCP@hartlepool.gov.uk

Online: https://hsscp.co.uk/

Out of hours: Emergency Duty Team Tel: 01642 524 552

Adults at Risk

Hartlepool
Tel: 01429 523 390
Email: dutyteam@hartlepool.gcsx.gov.uk

Stockton-on-Tees
Tel: 01642 527 764
Email: firstcontactadults@stockton.gov.uk

North Tees LADO
Philip Curtis
Tel: 01429 401844 (mobile 07787697635)
Email: phil.curtis@hartlepool.gov.uk
Secure Email: LADO@hartlepool.gcsx.gov.uk

Darlington Safeguarding Partnership

Children

Professionals: 01325 406252

Public: 01325 406222

Out of Hours Emergency Team: 01642 524552

Adults

Adult Contact Team: 01325 406111

Out of Hours Emergency Team: 01642 524552

Darlington LADO
Amanda Hugill
Tel: 01325 406450
Email: Amanda.hugill@darlington.gov.uk

Marian Garland
Tel: 01325 406451
Email: marian.garland@darlington.gov.uk

Durham and Cleveland Police

Emergency: 999

Non-Emergency: 101

Football

North Riding FA:

https://www.northridingfa.com/safeguarding-and-welfare

Clair Shield (Designated Safeguarding Officer) clair.shield@northridingfa.com 07702 736701

Premier League Safeguarding Team

safeguarding@premierleague.com 02078 649000

Premier League Charitable Fund (PLCF)

Kate Singleton (PLCF Senior Safeguarding Manager) safeguarding@plcf.co.uk 02078 649000

EFL Safeguarding Team:

safeguarding@EFL.com 01772 325490

Alex Richards (EFL Safeguarding Manager) arichards@efl.com 01772 325940

Scott Flynn (EFL Regional Safeguarding Officer) sflynn@efl.com 07583 074386

EFL in the Community (EFLitC)

Tara Lawson (Safeguarding and Incident Manager) tlawson@efl.com 07964 905652

FA Safeguarding Team:

safeguarding@thefa.com 0800 169 1863

National

NSPCC

https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/

help@nspcc.org.uk 0808 800 5000

Child Exploitation and Online Protection Centre (CEOP)

www.ceop.gov.uk

Child Protection in Sport Unit (CPSU)

https://thecpsu.org.uk/

cpsu@nspcc.org.uk 0116 366 5580

The Samaritans

https://www.samaritans.org/how-we-can-help/contact-samaritan/ 116 123

Papyrus Prevention of Young Suicide

https://www.papyrus-uk.org/

pat@papyrus-uk.org 0800 0644141

Shout – UK 24/7 Crisis Text Service

https://giveusashout.org/ text 'shout' to 85258

Stonewall – Standing for lesbian, gay, bi, trans, queer and questioning (LGBTQ+) people everywhere.

https://www.stonewall.org.uk/

Training Links

South Tees Safeguarding Children Partnership Training:

https://stscp.co.uk/training/

Hartlepool and Stockton on Tees Safeguarding Children Partnership Training:
https://hsscp.co.uk/professionals/page/51

Darlington Safeguarding Partnership Training:

https://www.darlington-safeguarding-partnership.co.uk/

19.2 LEGISLATION, POLICIES AND GUIDANCE
Please refer to the following documents for further guidance and support:

Keeping Children Safe in Education (KCSIE) 2024

Keeping Children Safe in Education (KCSIE) 2025 (Draft)

Working Together to Safeguard Children 2023

Education Act 2002

The Children Act 1989

The Children Act 2004

SEND Code of Practice 2015

The Care Act: Safeguarding Adults at Risk 2014

The Care Act 2014 sets out a clear legal framework for how local authorities and other parts of the system should protect adults at risk of abuse or neglect. Local Authorities have a duty to:

***Lead a Multi-Agency Local Adult Safeguarding System** that seeks to prevent abuse and neglect and stop it quickly when it happens.*

***Make enquiries, or request others to make them,** when they think an adult with care and support needs may be at risk of abuse or neglect and they need to find out what action may be needed.*

***Establish Safeguarding Adults Boards**, including the local authority, NHS and police, which will develop, share and implement a joint safeguarding strategy.*

***Carry out Safeguarding Adults Reviews,** when someone with care and support needs dies as a result of neglect or abuse and there is a concern that the local authority or its partners could have done more to protect them.*

Arrange for an independent advocate *to represent and support a person who is the subject of a safeguarding enquiry or review, if required.*

Any relevant person or organisation must provide information to the Safeguarding Adults Boards as requested.

Private Fostering Regulations 2005

What to do if you're worried a child is being abused - Advice for Practitioners (2015)

Female Genital Mutilation Act 2003

Prevent Strategy (Working Together Against Extremism)

Channel Duty Guidance - Protecting People Vulnerable To Being Drawn Into Terrorism

Counter Terrorism and Security Act 2015

Modern Slavery Act 2015

Health and Safety at Work Act 1974

Management of Health and Safety at Work Regulations 1999

Human Right Act 1998

Act outlining the European Convention of Human Rights in English law. This Act is designed to protect individuals from abuse by state institutions and people working for these institutions.

Speaking up for Justice 1998

This is a report from Interdepartmental Working Group on the treatment of Vulnerable or Intimidated Witnesses in the Criminal Justice System. The aim of the Working Group was to improve access to justice for vulnerable or intimidated witnesses, including children. It made a total of 78 recommendations (that were accepted) for improvements to the criminal justice system including the reporting of crime, identification of vulnerable or intimidated witnesses, and measures to assist witnesses before, during and after the trial.

Youth and Criminal Evidence Act 1999

The recommendations from 'Speaking up for Justice 1998', that required legislative changes were incorporated into this.

Care Standards Act 2000

This Act created the National Care Standards Commission, an independent, non-governmental public body, to regulate social and health care services previously regulated by local councils and health authorities. It also extended the scope of regulation to other services not previously registered, to include domiciliary care agencies, fostering agencies and residential family centres.

No Secrets 2000

This is guidance on developing and implementing multi-agency policies and procedures to protect vulnerable adults from abuse. No Secrets gives guidance to local agencies who have a responsibility to investigate and take action when a vulnerable adult is believed to be suffering abuse. It offers a structure and content for the development of local inter-agency policies, procedures and joint protocols which will draw on good practice locally and nationally.

Sexual Offences Act 2003

This Act introduced a number of new offences concerning vulnerable adults and children.

Protection of Vulnerable Adults List 2004

Implemented in July 2004, employers can now apply to place employees on the list that they deem to be unsuitable to work with vulnerable adults. There does not have to have been a criminal prosecution. The person has a right of appeal. It is a criminal offence to apply for a job working with vulnerable adults while on the list.

Mental Capacity Act 2005

The general principle of this Act is that everybody has capacity unless it is proved otherwise, that they should be supported to make their own decisions, that anything done for or on behalf of people without capacity must be in their best interests and there should be least restrictive intervention.

20. POLICY APPENDIX

APPENDIX I

Safeguarding Adults at Risk Policy

21. POLICY UPDATES

This policy will be reviewed and updated in June 2026, or sooner, in the event of:

1. a major safeguarding incident whereby the policy will be updated within 4 weeks.
2. a brand-new activity or service involving contact with children and/or adults at risk is implemented.
3. a change in safeguarding legislation.
4. a significant organisational change

Version Control
This policy will be reviewed and updated at least annually by the owner, and more frequently if necessary. This document will be available to Organisation Personnel on the Organisations IT networks. This document will be available to all on the Organisations Websites

The following identifies all version changes:

Version	Date	Reason for Update	Author
0.8	July 2015	Safeguarding Policy Update	Yvonne Ferguson
0.9	September 2016	Premier League Safeguarding Policy Update	Brian Robinson
1.0	May 2017	Safeguarding Policy Update	Brian Robinson

1.1	May 2018	Safeguarding Policy Update	Brian Robinson
1.2	May 2018	Safeguarding Policy Update	Brian Robinson
1.3	July 2018	Safeguarding Policy Update	Brian Robinson
1.4	October 2018	Safeguarding Policy Update	Brian Robinson
1.5	July/Aug 2019	Safeguarding Policy Update	Brian Robinson
1.6	November 2019	Policy Update	Brian Robinson
1.7	December 2019	Policy Update	Brian Robinson
1.8	February 2020	Policy Update	Brian Robinson
1.9	March 2020	Policy Update	Brian Robinson
1.10	October 2020	Policy Update	Brian Robinson/Legal
1.11	December 2020	Policy Draft Update	Brian Robinson/Legal
1.12	July /August 2021	Policy Update	Brian Robinson
1.13	July 2022	Policy Update	Brian Robinson
1.14	November 2022	Policy Update	Brian Robinson
1.15	November 2022	Policy Update	Brian Robinson
1.16	April 2023	Information Update	Brian Robinson
1.17	July 2023	Policy Redesign and Update	Brian Robinson/Ruth Martin
1.18	February 2024	Update	Brian Robinson
1.19	March 2024	Update Safeguarding Structure / Contacts	Brian Robinson
1.20	June 2024	Annual Review	Brian Robinson/Ruth Martin
1.21	June 2025	Annual Review	Brian Robinson Ruth Martin Michael Waller
1.22	July 2025	Update: KCSIE 2025	Ruth Martin