



**MIDDLESBROUGH FOOTBALL CLUB & MIDDLESBROUGH FOOTBALL CLUB FOUNDATION
SAFEGUARDING POLICY
2021-2022**



STATEMENT OF COMMITMENT

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

The Organisations make provisions for Vulnerable Persons ensuring that:

- the welfare of these persons is paramount;
- all Vulnerable Persons, whatever their age, culture, disability, sex, language, race, religion or belief and/or sexual identity 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 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 - MFC

John Baker
Chairman - MFCF



COVID-19

The COVID-19 pandemic has significantly impacted the operating procedures of all businesses. The Organisations' have implemented measures to ensure that all individuals are in as safe an environment as possible whilst attending activities, facilities or sites operated by the Organisations in accordance with guidance issued by the Premier League, the EFL and the Government.

Safeguarding principles remain the same with the best interests of Vulnerable Persons as a priority.

If anyone has a safeguarding concern about any Vulnerable Person connected to the Club, they should act immediately. A Designated Safeguarding Officer will always be available.

ORGANISATION SAFEGUARDING CONTACTS DETAILS

Robin Bloom - Board Level Senior Safeguarding Lead (BLSSL) 07980 769554

Brian Robinson - Head of Safeguarding (MFC & MFCF) (CHOS) 07730 565788

DESIGNATED SAFEGUARDING OFFICERS (DSO)

Yvonne Ferguson - MFC Head of Supporter Services/Matchday Designated Safeguarding Officer
Tel: (01642) 757648 / 07841 997 704

Barry Dawson - MFC Academy Head of Education & Welfare/Academy Designated Safeguarding Officer
Tel: (01325) 722222 / 07801 335 763

Marc McPhillips - MFCF East Cleveland Manager/Foundation Designated Safeguarding Officer
Tel: (01642) 454816 / 07528 552582

If you have **serious concerns about the immediate safety** of a Vulnerable Person, contact the Police or Social Services. Record the name of the person you spoke to and inform the relevant CHOS/DSO of the report and any actions.

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



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attending MFCF programmes, and Academy Players are also advised in relation to the safeguarding procedures in place within the Organisations.

DEFINITIONS

Child: an individual under the age of 18. *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.*

Adults at Risk: a person aged 18 or over who is receiving one of the following services:

- health care
- relevant personal care
- social care work
- assistance in relation to general household matters by reason of age, illness or disability
- relevant assistance in the conduct of their own affairs or conveying (due to age, illness or disability in prescribed circumstances)

For more detail please see the Adults at Risk Policy.

Organisation Personnel: any member of the workforce either Middlesbrough Football Club or MFC Foundation, in a paid or unpaid capacity including volunteers.

Vulnerable Persons: children, young people and Adults at Risk collectively.

POLICY AIMS

The aim of our Safeguarding Policy is to promote good practice and to enable Organisation Personnel to:

- provide Vulnerable Persons with appropriate safety and protection whilst in the care of MFC and MFCF
- through the provision of relevant safeguarding training, delivered by appropriate training providers as appropriate to their role or engagement
- make informed and confident responses relating to specific safeguarding issues
- through education and communication, raise awareness amongst Vulnerable Persons and their parents/guardians/carers to understand their role in safeguarding

SCOPE

This policy applies to all activities run or managed by either Organisation whether they are undertaken within the Stadium, Training Ground, Academy, Foundation facilities or at any external venue.

PROMOTING GOOD PRACTICE WITH VULNERABLE PERSONS

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,



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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 MFC or MFCF 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 respond to any request to complete or update your DBS Criminal Records Check
- promptly inform the HR Department in respect of any investigation, allegation or arrest which may impact your role in working with Vulnerable Persons
- work in an open environment, for example, avoid private or unobserved situations and encourage an transparency in communication
- treat all people, including Vulnerable Persons, equally and with respect and dignity
- put the welfare of the individual before winning and achieving goals
- maintain a professional relationship with Vulnerable Persons, for example, never have an intimate relationship with a Child U18 (even if they are over 16 years old) or an Adult at Risk (even if they are over 18 years old)
- never take advantage of a position of trust, control or responsibility for those in your supervision, care, support or coaching environment
- build balanced relationships based on mutual trust which empowers Vulnerable Persons to share in the decision-making process
- make football fun, enjoyable and promote fair play

Coaching Contact:

- If any form of manual/physical contact is required, it should be provided openly and according to coaching guidelines provided by the National Governing Body (NGB) of the sport and in line with The Premier League or English Football League Child Protection Guidance. Care is needed as contact may be difficult to maintain when a child is constantly moving. Young people/young players should always



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be consulted and their agreement gained. Some parents are becoming increasingly sensitive about manual support and their views should be carefully considered.

- All Organisation Personnel with direct contact with Vulnerable Persons must pass an enhanced DBS check
- Keeping up to date with the technical skills and qualifications in football to the appropriate level.
- 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.
- Ensure that if mixed teams are taken away, they should 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.
- Ensure that at tournaments or residential events, adults should not enter Vulnerable Persons rooms or invite Vulnerable Persons into their rooms.
- Being an excellent role model – this includes not smoking, not drinking excessive amounts of alcohol, not using drugs or not using bad language in the company of Vulnerable Persons.
- When coaching, give enthusiastic and constructive feedback recognising the development needs and capacity of Vulnerable Persons – avoid excessive training or competition and not pushing individuals against their will.
- 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 current 'Parental Consent Form' as amended from time to time.
- 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.

Keep a written record of any injury or incident 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 an incident/accident report form.

- Request written parental consent if Organisation Personnel are required to transport Vulnerable Persons in Organisation vehicles. Transporting Vulnerable Persons in Organisation Personal vehicles **should** be avoided unless absolutely necessary.

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.



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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 positions 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.

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 Middlesbrough 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.

MANAGING LOW LEVEL CONCERNS

It has been recognised by the Organisation 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. Where Low Level concerns are shared with a designated safeguarding member of staff in accordance with the Organisation's safeguarding policy, these must be recorded as per 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 Organisation's Code 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 Tootoot electronic Safeguarding management system and entitled 'Low Level Concern' in the 'Concern Summary' section. Low Level Concerns do not in any way override or replace the Organisation's 'Whistle Blowing Policy' but compliment and work alongside that process. Two Examples of Low-level Concerns: Physical - Staff error causing no/little harm, e.g. skin friction mark due to ill-fitting bib during football/PE session Psychological – This could be an isolated incident where and adult, adult at risk or child is spoken to in a rude or inappropriate way – respect is undermined but little or no distress caused. This list is not limited to the above but is extensive and any uncertainty should be discussed with the Head of Safeguarding or Designated Safeguarding Officers.

PRACTICES TO BE AVOIDED

The following should be **avoided** except in emergencies. 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 with the Organisation. For example, a child sustains an injury and needs to go to hospital, or a parent/guardian fails to arrive to pick a child up at the end of a training session/match.

- Avoid taking Vulnerable Persons to their own home where they will be alone.
- Avoid taking Vulnerable Persons to your home where they will be alone with you.



PRACTICES NEVER TO BE SANCTIONED

The following should **never** be sanctioned. You 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, even in fun.
- 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 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. You must be responsive to a person's sensitivities and reactions. If a person is fully dependent on you, talk with him/her about what you are doing and give choices where possible. This is particularly so if you 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 you are unsure on any of the issues in this section you must check with the DSO, with your supervisor and with parents/guardian or carers. The DSO should be able to assist with further information.

If any of the following occur you should report this immediately to the CHOS, DSO or your Line Manager who will advise what to do next. You should make a record of the incident. 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 you accidentally hurt a child or young person or you observe another adult hurting a child.
- If they seems distressed in any manner.
- If a child or young person appears to be sexually aroused by your actions.
- If a child or young person misunderstands or misinterprets something you have done.



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- If there is a sudden change in behaviour, ie the child or young person's behaviour becomes bad or they become withdrawn.

GUIDELINES FOR 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.

Both Organisations have relevant policies and consent forms in place and engage official photographers. Written parental/guardian consent must be sought prior to any child or young person in the care of either Organisation being photographed or filmed. Any observers will be asked not to photograph or film. Please refer any queries or concerns to the CHOS or DSO.

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

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

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. When undertaking pre-selection checks the following are applied:

- Applicants who will work with Vulnerable Persons must complete an MFC/MFCF application form. This application form will collect information about the applicant's past and self-disclosure (relevant to the role) about any criminal record or involvement with the Police or family courts.
- Consent will be obtained from an applicant to seek information/or an application from the Disclosure Barring Service (DBS).
- All applicants who are offered a position which involves working directly with Vulnerable Persons will be required to undertake an enhanced DBS check and supply two character references in writing. No open references will be accepted unless confirmed through telephone contact.
- Any gaps in employment will be questioned and investigated.
- Photographic evidence of identity required
- Proof of eligibility to work in the UK required.
- A check will be made with The FA to ensure the person is not suspended from football.



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- Information received may prevent an offer of employment being made or a volunteer being engaged by MFC or MFCF. The individual will be notified of the decision in writing.
- A Criminal Record Check must be in date and be no older than 3 years.
- 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.
- Individuals who have a criminal record will be treated fairly in relation to any job application at the respective Organisation and not be discriminated against because of a conviction or other information brought to our attention.
- All DBS outcomes are considered against the role being applied for; a DBS with convictions, does not necessarily mean that employment will be rejected.

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 Organisation 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 Organisation 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 Organisation 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 Organisation will, once it has selected the person to whom it wishes to offer employment, seek documentary evidence about that person's criminal convictions. The Organisation will seek the



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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 Organisation 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.

DATA PROTECTION

MFC or MFCF (as applicable) will be the Data Controller of the information provided or information collected about the applicant 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 General Data Protection Regulation ("GDPR"), Data Protection Act 2018 and their respective Privacy Notice (Recruitment), a copy of which is available at www.mfc.co.uk and www.mfcf.co.uk or the Data Protection Officer.

STAFF TRAINING

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

All Organisation Personnel receive a safeguarding induction.

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

TEMPORARY STAFF AND EXTERNAL CONSULTANTS/SUB-CONTRACTORS

All temporary staff (employed or voluntary) and 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. A Service Level Agreement will be in place with sub-contractors which outlines their Safeguarding Responsibilities and compliance with this Policy.

SAFEGUARDING – SUB-CONTRACTORS 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 include the following (as applicable):

- express safeguarding obligations and responsibilities
- reporting procedures in the event of a safeguarding concern arising
- obligation to undertake safe recruitment procedures
- 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
- requirement for service provider to hold valid public liability and employer's liability insurance
- details of safeguarding training undertaken by service provider personnel
- who has responsibility for completion of consent forms (e.g. medical and image consent), registration, record keeping and risk assessments
- details of First Aid arrangements
- clear guidance on the reporting of safeguarding concerns or concerns regarding Poor Practice during and outside of normal office hours
- Name and contact details of Organisation Personnel to whom safeguarding concerns, or concerns regarding poor practice, should be reported
- Evaluation procedures in place to gain the Vulnerable Persons views about the activity
- The period by which the safeguarding arrangements in the agreement will be reviewed

RESPONDING TO SUSPICIONS OR ALLEGATIONS

It is not the responsibility of Organisation Personnel to decide whether or not the alleged harm or abuse has taken place. However, it is their responsibility to act on any concerns through contact with the Safeguarding Team and, if applicable, appropriate authorities.

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.



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ACTION IF THERE ARE CONCERNS

The following action should be taken if there are concerns:

POOR PRACTICE

- If the allegation is about unacceptable behaviour the 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 the Robin Bloom (BSSL) who will discuss with appropriate management and decide how to deal with the allegation and whether or not to initiate disciplinary proceedings.

SUSPECTED ABUSE

- Any suspicion that a Vulnerable Person has been harmed or abused by a member of Organisation Personnel should be reported to the CHOS or appropriate DSO, who 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 BSSL and the FA/Premier League/Football League Safeguarding Advisor. 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 BSSL.
- If the CHOS is the subject of the suspicion/allegations, the report must be made to the BSSL who will refer the allegations to Social Services.

CONFIDENTIALITY

The Organisations operate on the premise that all personal information imparted to Organisation Personnel is to be treated in confidence. Trust and confidence is 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. Organisation 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 either.

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.



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INFORMATION SHARING

The Organisations are committed to sharing information for the purposes of safeguarding and promoting the welfare of children and young people in line with Working Together (2013) and always in accordance with the General Data Protection Regulations, Data Protection Act 2018 and the Organisations Privacy Notices. Any decision to disclose confidential information should, where appropriate, be preceded by informing the affected individual of the disclosure and the reason for it. Organisation Personnel should also try to seek the consent of the person who makes the disclosure. There will be no breach of confidence if the person to whom a duty of confidence is owed, consents to the disclosure. Organisation Personnel should, in the first instance, seek the consent from the person if considering sharing information with other agencies. It is therefore essential that members of staff understand the balance between the need for confidentiality and the need for the sharing of information. For that reason, they must not promise absolute confidentiality to the person who discloses any concern or allegation. Information which is considered important in protecting the safety and welfare of Vulnerable Persons will be shared by the Organisations with the appropriate statutory and regulatory agencies in order to seek help and keep those involved safe.

If a person discloses information and asks for it to be kept confidential then this person cannot be told that information (disclosure) is totally confidential since it has to be passed on or referred for help to be sought.

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/guardian of the person who is alleged to be abused (only with guidance from statutory agencies).
- The person making the allegation.
- Social Services/Police.
- BSSL/Chief Executive/Chief Operating 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.

INTERNAL ENQUIRIES AND SUSPENSION

The CHOS (or appropriate DSO for the relevant area) will make an immediate decision in conjunction with the BSSL 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 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 & Administration in conjunction with the BSSL, 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 BSSL, 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 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
BACP House
15 St John's Business Park
Lutterworth
Leicestershire
Tel: 01455 883300
Fax: 01455 550243
Minicom: 01455 550307
Text: 01455 560606
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.

OTHER POLICIES

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

EFL SAFEGUARDING STANDARDS

SAFER RECRUITMENT AND SELECTION POLICY

EQUAL OPPORTUNITIES POLICY

HEALTH AND SAFETY POLICY

IMAGES POLICY

MASCOTS POLICY

SOCIAL MEDIA AND MEDIA POLICY

WHISTLEBLOWING POLICY



PRIVACY STANDARD

CODE OF CONDUCT

LATE COLLECTION POLICY

PREMIER LEAGUE/EFL Safer Working Practice - the Organisations follow guidance from The Premier League and EFL for safer working practice which includes operating procedures and minimum delivery ratios. This is available to all employees along with the Organisations Codes of Conduct via the shared drive, internal notice boards and communicated on induction.

Staffing Ratios - any activity undertaken by the Organisations will done so with the correct ratio of Organisation Personnel to children 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.

- 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

Working 1:1 with Vulnerable Persons should only happen in exceptional circumstances and on the approval and guidance from the Head of Safeguarding.

HEALTH & SAFETY POLICY - this policy sets out the procedures to the protection of young people both within the Organisation's physical environment and when away from Organisation facilities for trips and visits. It is reviewed annually or within four weeks of the outcome of a serious safeguarding or health and safety incident.

INFORMATION FOR STAFF AND VOLUNTEERS

DEFINING 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.

RECOGNITION – SIGNS OF ABUSE

There are six main forms of abuse as set out below. Should you have any concern that abuse is occurring you should contact the appropriate DSO immediately.

1. 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, as in Munchausen's syndrome by proxy.

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.

2. SEXUAL ABUSE

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

3. 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 standards is also a form of emotional abuse.

4. 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.

5. PEER-ON-PEER ABUSE

Peer-on Peer 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.

6. 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.



ACTION IF BULLYING IS SUSPECTED

The Organisations have a zero tolerance of bullying and takes all complaints of bullying seriously in line with the Anti-Bullying & Harassment Policy. Serious and prolonged bullying may lead to isolation. There have been some well publicised examples of Vulnerable Persons that are committing suicide as a result of bullying. Therefore, if anyone talks about or threatens suicide, seek advice from the CHOS and DSO who may discuss the matter with the Club Doctor.

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.

ACTION TO HELP THE VICTIM(S) AND 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 contact the school (or organisation where the bullying is happening).

ACTION TOWARDS THE BULLY(IES)

- 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 of the victim(s).
- Impose sanctions if necessary.
- Encourage and support the bully(ies) to change behaviour.
- Hold meetings with the families to report on progress.
- 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 coaching staff are aware of the outcome and that they monitor the situation to reduce the chances of a re-occurrence.

ALLEGATIONS OF PREVIOUS ABUSE (HISTORIC COMPLAINTS)

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 historic 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 no recent historic abuse must be reported.

Child Sexual Exploitation (CSE)

A type of abuse in which children in exploitative situations and relationships receive something such as gifts, money, or affection as a result of performing sexual activities or others performing sexual activities on them. Children or young people may be tricked into believing they are in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed on line. Some children and young people are trafficked into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs.

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, severe 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.

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
- being held against your will or taken somewhere you don't want to go
- assault

Child trafficking

Child trafficking is the movement of a young person for the purpose of exploitation. This includes:

- A young person being bought or sold for money
- A young person being tricked into leaving home
- A young person who is given away by their family because the family need money
- A young person who is made to leave their home because of war
- A young person who chooses to leave home, thinking they are going to a better life

The move of the young person can be international or within the same country. There could be lots of reasons the person has moved including:

- Sexual exploitation
- Forced labour
- Domestic servitude
- Organ harvesting
- Child related crimes such as child sexual exploitation, forced begging, illegal drug cultivation, organised theft, related benefit frauds etc.
- Forced marriage and illegal adoption (if other constituent elements are present)

The reasons for the move generally benefit the people who take the young person and the people who exploit or abuse them. The young person does not benefit from the move. In fact, in most cases the young person suffers because they have been forced or tricked into moving.



What are the signs of someone being trafficked?

One or two of these signs might not necessarily mean a person has been trafficked, but if you have any concerns about a Vulnerable Person please contact a Safeguarding Officer.

- Physical signs that someone has tried to hurt them (bruises/cuts).
- Does not come into school all the time.
- Has different adults around them quite a lot.
- Often seems tired or worn out.
- Does not often speak to other people or seems withdrawn.
- Seems to be afraid of people in authority (teachers/adults).
- Gets angry easily or can be violent.
- Looks like they find it difficult to concentrate or focus on something.
- Have moved to the UK a while ago, but still don't really know the language.
- Have suggested they don't live with family or have a bad time at home.

Child exploiters and traffickers are targeting both boys and girls.

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 and extremism of Vulnerable Persons are a form of emotional abuse. HM Government states that the aim of radicalisation is to attract Vulnerable Persons to a particular extremist ideology. In many cases it is with a view to inspiring Vulnerable Persons eventually to become involved with harmful or terrorist activities. Radicalisation can take place through direct personal contact, or indirectly through social media. Extremism is defined as vocal or active opposition to fundamental British values including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

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.

SAFETY AND THE SAFEGUARDING OF VULNERABLE PERSONS WITHIN THE STADIUM ON MATCH DAYS

Standing in Seated Areas

The Sports Ground Safety Authority (SGSA) have published 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 English Football League (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 this season to encourage both home and away supporters to remain seated.

Known Sex Offenders

The Organisations work closely with the police and local authorities including the LSCB in relation to child protection, and when concerns are raised MFC takes advice from the police and local safeguarding board as to the level of risk of any known sex offender who may have connections with the MFC as a supporter or visitor. MFC reserves the right in conjunction with the police and other authorities to ban or suspend supporters who have been charged or convicted of any sexual offence or are on the sex offenders register.

Under 18's Within a First Team Environment and Whilst 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 English Football League (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

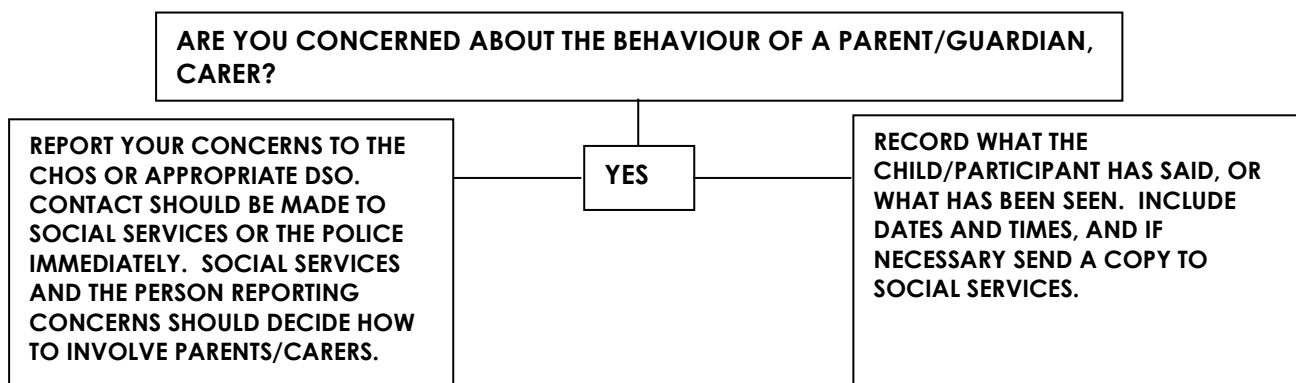


to ensure they are placed with the appropriate host family. If the player's parent/guardian is also travelling with the player then a local hotel may be used as an alternative. Transportation will be arranged during the trial period.

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. Separate procedures are available to support this progression. A full policy is available on request.

A QUICK GUIDE TO PROCEDURES

This guide is designed to take the most appropriate action in relation to concerns about either a parent or carer.



Remember:

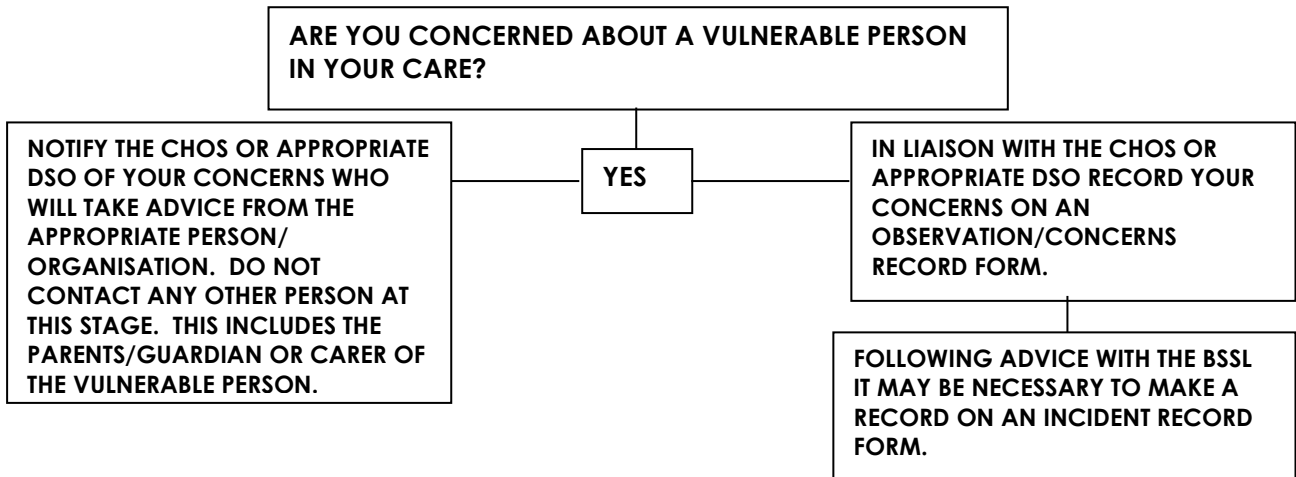
- Maintain confidentiality on a need to know basis only.
- Ensure the CHOS or appropriate DSO follows up with Social Services.

The CHOS should also report the incident to the BSSL who should ascertain whether or not the person(s) involved in the incident play a role within MFC or MFCF and act accordingly.

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.



This guide is designed to take the most appropriate action in relation to concerns about either a Vulnerable Person in your care.



Remember:

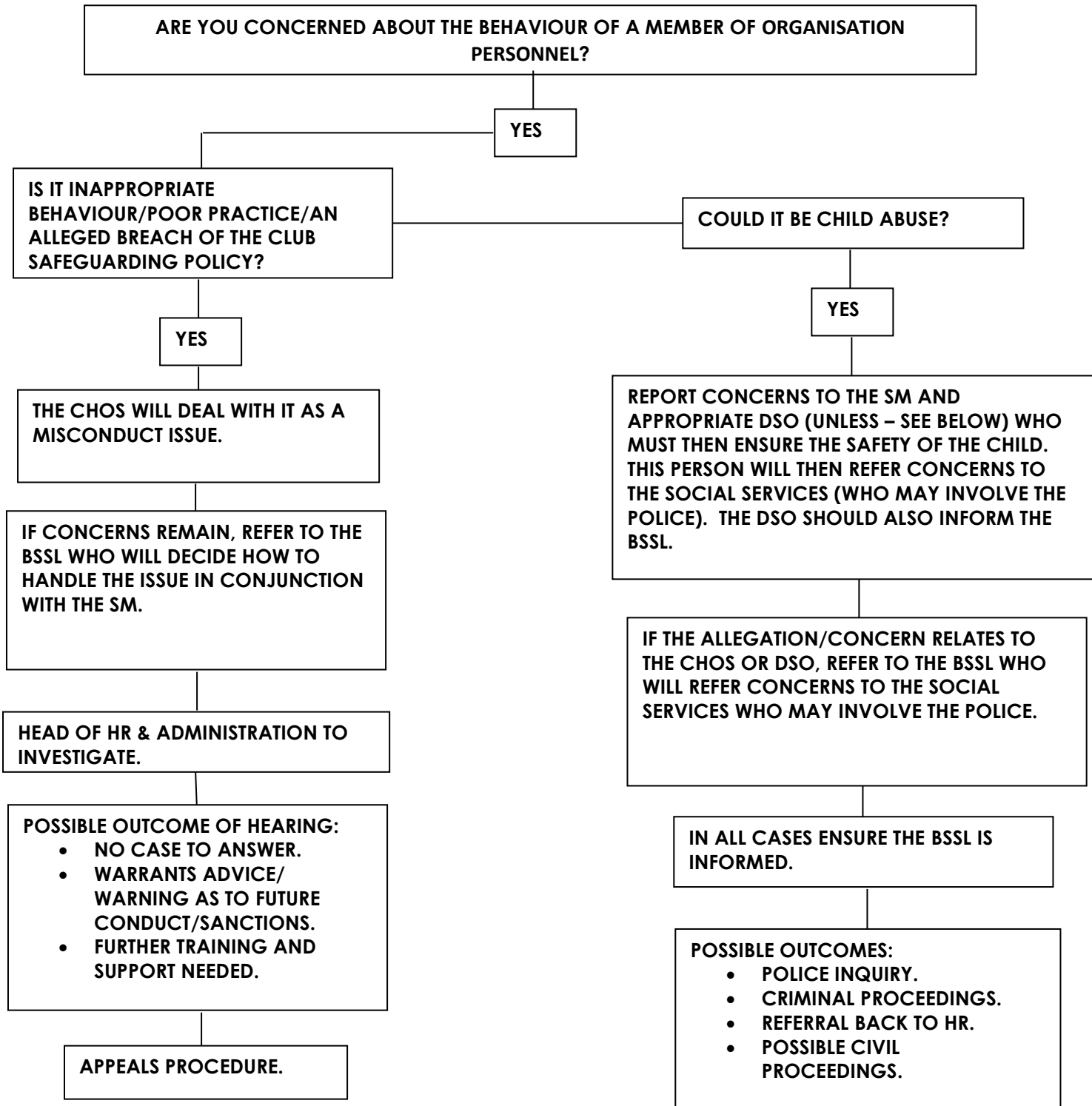
- Maintain confidentiality on a need to know basis only.
- Ensure the CHOS or appropriate DSO follows up with Social Services.

The CHOS should also report the incident to the BSSL who should ascertain whether or not the person(s) involved in the incident play a role within MFC or MFCF and act accordingly.

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.



The flowchart shown below is designed to inform the most appropriate action in relation to concerns about a member of Organisation Personnel within either MFC or MFCF.





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GUIDANCE FOR RESPONDING TO A VULNERABLE PERSON WHO DISCLOSES

- 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.
- Contact your CHOS immediately. If they are unavailable, then report your concerns to either the County Football Association's Welfare Officer or the Football League/Premier League 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.
- Alternatively, you may report your concerns to the NSPCC 24-hour Helpline 0808 800 5000.
- Following the basic guidelines will help to do the right thing in the right way. Use these notes when reporting your concerns verbally, try to stay calm and unemotional and use simple and clear language.
- 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.
- 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.
- Include any actions you have taken and any advice given.
- Do not share the information with anyone else: parents, colleagues, other Organisation Personnel. However, you may need some support yourself and you should discuss this with either the Head of HR or the Head of Education & Welfare Officer.
- 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.



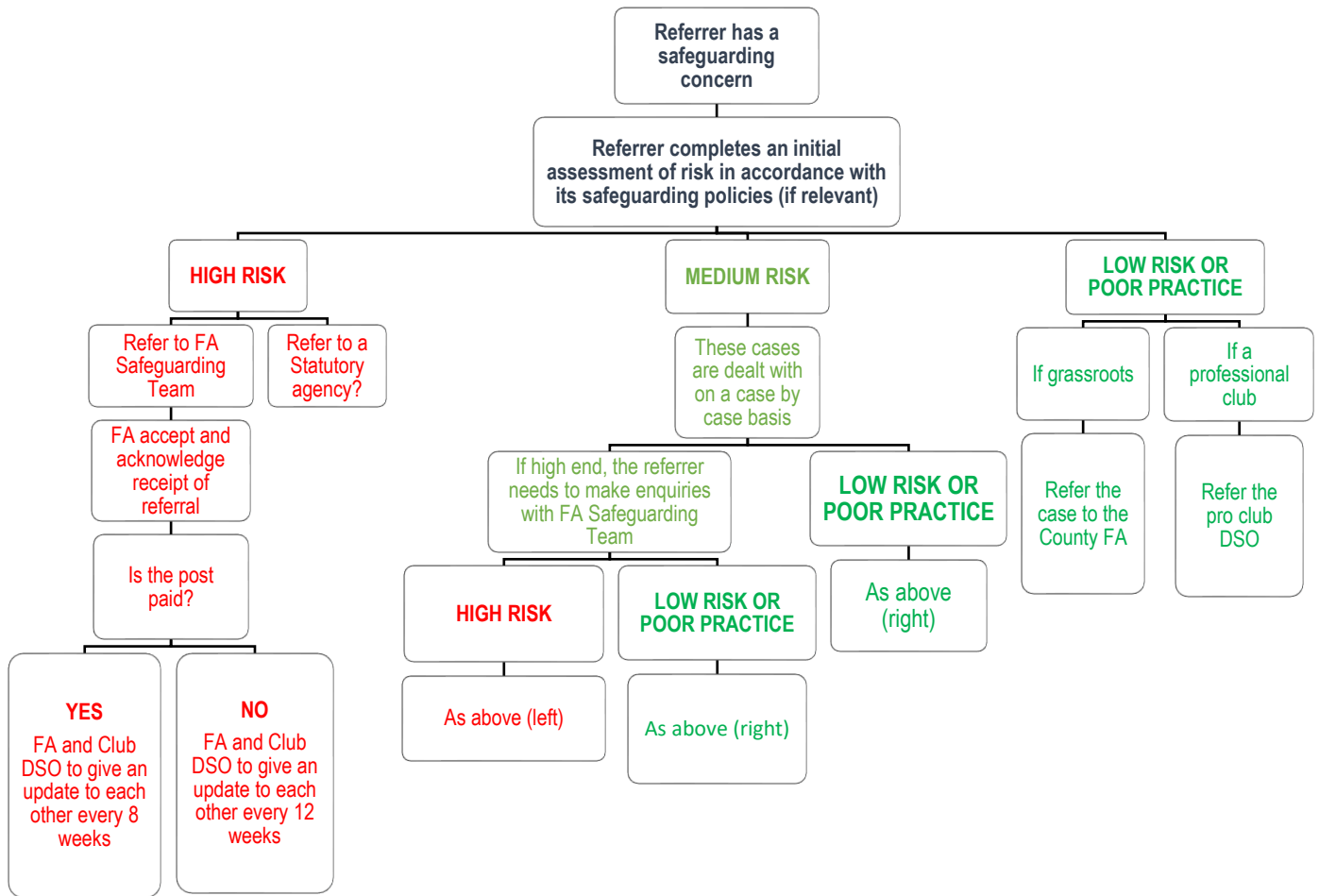
WHAT TO DO IF THERE ARE CONCERNS

Information passed to Social Services or the Police must be as helpful as possible, hence the necessity for making a detailed record at the time of the disclosure/concern. Information should include the following:

- Name of Vulnerable Person.
- Age of Vulnerable Person and date of birth.
- Home address and telephone number.
- Is the person making the report expressing their own concerns or those of someone else?
- What is the nature of the allegation? Include dates, times, any special factors and other relevant information.
- Make a clear distinction between what is fact, opinion or hearsay.
- A description of any visible bruising or other injuries, behavioural signs, indirect signs.
- Witnesses to the incidents.
- The Vulnerable Person's account, if it can be given, of what has happened and how any bruising or other injuries occurred.
- Have the parents/guardian/carer been contacted? If so, what has been said?
- Details of other people consulted.
- If it is not the Vulnerable Person making the report, has the child concerned been spoken to? If so what was said?
- Has anyone been alleged to be the abuser? Record details.



REFERRAL PROCESS TO THE FA/PL/EFL SAFEGUARDING TEAM



MAKING A REFERRAL

A referral is 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. 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/PL Safeguarding Team, the Club DSO 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.

The FA’s Safeguarding Team can be contacted on 0844 980 8200 (Extn 6401 or 6876) or alternatively the relevant County FA Welfare Officer can be emailed directly or telephoned.



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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 relevant CHOS/DSO within the professional game will discuss who attends the Strategy Meeting.

SUSPENSIONS

When The FA suspends a participant The FA Safeguarding Team will notify the relevant CHOS/DSO 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.

DEALING WITH POOR PRACTICE CONCERNS

Affiliated football takes poor practice seriously. All cases should be dealt with in line with the relevant football bodies disciplinary process and their safeguarding policies. Grassroots clubs or members of the public need to alert their local County FA of any concerns. Professional clubs need to send a referral to The FA Safeguarding Team where repeated poor practice incidents occur. 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.

Poor practice is defined as follows:

- When insufficient care is taken to avoid injuries (e.g. by excessive training or inappropriate training for the age, maturity, experience and ability of players).
- Allowing abusive or concerning practices to go unreported (e.g. a coach who ridicules and criticises players who make a mistake during a match).
- Placing children or young people in potentially compromising and uncomfortable situations with adults (e.g. inappropriate use by a coach of social media with a young player(s)).
- Ignoring health and safety guidelines (e.g. allowing young players to set up goal posts unsupervised by adults).
- Failing to adhere to the Club's code of practice (e.g. openly verbally abusing the referee).
- Giving continued and unnecessary preferential treatment to individuals.

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 can be dealt with by the grassroots or professional club, or alternatively with support and guidance from The Premier League or Football League as appropriate, or the County FA.

USEFUL CONTACT DETAILS

Middlesbrough Council Social Services

During Working Hours: Monday to Thursday 8:30am to 5:00pm, Friday 8:30am to 4:30pm **First Contact Team:** (01642) 726004 – out of hours 08702 402994 **Email** (children's services - South Tees Multi Agency Children's Hub) southteesmach@redcar-cleveland.gov.uk



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The Children's Hub, Hartlepool and Stockton-on-Tees: 01429 284284 (please note the Hartlepool dialling code)
Email: childrenshub@hartlepool.gov.uk Telephone: 01642 524552 (For outside office hours)

First Contact: If you have any concerns about a child or young person call you local **First Contact team on: Stockton - 01642 527764. Middlesbrough – 01642 726004., Redcar and Cleveland – 01642 771500 Hartlepool – 01429 284284**

Out of Children's Services hours: Emergency Duty Team 08702 402994/Cleveland Police: (01642) 326326

South Tees Safeguarding Children Partnership STSCP website at <https://stscp.co.uk/>

North Riding FA: (01642) 717778

Premier League Safeguarding; safeguarding@premierleague.com

EFL Safeguarding Team: safeguarding@EFL.com

FL Child Protection Advisor: 01772 325 811/07795 628 379

FA Safeguarding Team: 0800 169 1863 or via safeguarding@thefa.com

NSPCC Helpline number: 0808 800 5000/ www.nspcc.org.uk/inform/cps **Text phone number:** 88858

CEOP Child Exploitation and Online Protection Centre www.ceop.gov.uk - Dedicated to eradicating the sexual abuse of Children

Child Protection in Sport Unit www.nspcc.org.uk/inform/cpsu - works with sports governing bodies to minimise the risk of Child abuse

Other Useful Safeguarding Links

MSCB email : mccb@middlesbrough.gov.uk

MSCB Secure email : mccb@middlesbrough.gcsx.gov.uk

MSCB Website www.middlesbrough.gov.uk/mccb/safeguarding

Access to Tees LSCBs Child Protection Procedures - <http://www.teescpp.org.uk/>

Useful web links:

[LSCB Training Redcar and Cleveland](#)

[LSCB Training - Middlesbrough](#)

[E-Learning - http://mrcscb.virtual-college.co.uk/](http://mrcscb.virtual-college.co.uk/)

[PREVENT-Working Together Against Extremism.pdf](#)

[Safeguarding against radicalisation PL-MFC 16-17.pdf](#)



https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550511/Keeping_children_safe_in_education.pdf

Further Safeguarding Information

Please refer to the following documents for further guidance and support;

KCSIE 2020/2021

Working Together to Safeguard Children December 2020

Protection of Freedoms Act 2012

What to do if you are worried about a child being abused 2015. Along with further legislation such as Children Act 1989 and 2004,

Education Act 2002, Counter Terrorism and Security Act 2015
(see end of document for a list of safeguarding legislation and government guidance documents)

Legislation and statutory guidance

Working Together to Safeguard Children 2019
The Children Act 1989 and 2004
Keeping Children Safe in Education 2020/2021
Health and Safety at Work Act 1974
Management of Health and Safety at Work Regulations 1999
Modern Slavery Act 2015
Counter Terrorism and Security Act 2015
Private Fostering Regulations 2005
Female Genital Mutilation Act 2003
General Data Protection Regulations 2018
SEN Code of practice guidance 2015.

Please also refer to other MFC POLICIES

Social Media & Media Policy
Privacy Standard
Equal Opportunities Policy
Photography/Image Consent Policy
Recruitment policy
Staff Induction process
Anti-Bullying & Harassment Policy
Whistle-blowing Policy
Health and Safety Policy
Trips, tours and tournaments Policy
Transport Policy
Late Collection of Children Policy
ITC Policy
Modern Slavery Policy
Covid-19 Operational Procedures and Policies



Key Government Initiatives and Legislation

Human Rights Act 1998

- This Act came into force in this country on 2 October 2000. It brings the rights outlined in the European Convention of Human rights into English law for the first time. The Act is designed to protect individuals from abuse by state institutions and people working for these institutions. BILD has developed an easy guide to the Human Rights Act and its implications for people with learning disabilities.

Speaking Up for Justice 1998

- This was a report of the 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 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. All 78 recommendations were accepted.

Youth Justice and Criminal Evidence Act 1999

- The recommendations from Speaking Up For Justice that required legislative changes were incorporated into this Act.

Care Standards Act 2000

- The Care Standards 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. The Commission for Social Care Inspection replaced NCSC in April 2004.

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.

Achieving Best Evidence 2002

- This document 'Achieving Best Evidence in Criminal Proceedings' offers guidance for vulnerable or intimidated witnesses, including children. It replaces the previous 'Memorandum of Good Practice' that only referred to children. There are two volumes covering the planning and conducting of interviews, witness preparation and support and witnesses in court.

Sexual Offences Act 2003

- The Sexual Offences Act introduced a number of new offences concerning vulnerable adults and children.

Protection of Vulnerable Adults list 2004



Foundation

- The list was 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

- Its general principle 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.

The Care Act: safeguarding adults 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 new safeguarding duties. They must:

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.

APPENDIX III

SAFEGUARDING ADULTS at Risk STAFF AND VOLUNTEER REPORTING TOOLKIT

Name of adult:

Date of Birth:

Gender:

Ethnicity:

Home address:

Phone numbers:

Please continue on a separate sheet if necessary.

NB: if information is unknown it is still crucial that you share the information that you do have.



Adult's supports in the community, e.g. key-carer, agency, family *member, etc*

GP name, address and phone number

What are the person's views about a referral being made?

Who is alleging/suspecting abuse?

Vulnerability of person & alleged perpetrator if known. Include *communication, understanding, capacity, physical disability, Learning Disability, any mental Health problems & relevant medical information*

Description of what has given cause for concern, including dates, *times events and location*

Brief statement outlining any emergency action taken

Action taken

Brief statement outlining any emergency action taken.

POLICY UPDATE

This policy will be reviewed and updated in November 2021, or sooner, in the event of:

1. 4 weeks within a major safeguarding incident
2. When a brand-new activity or service involving contact with children and/or adults at risk is implemented
3. There is change in safeguarding legislation
4. A significant organisational change

Version Control

1. This policy will be reviewed and updated at least every year by the owner, and more frequently if necessary.
2. This document will be available to Organisation Personnel on the Club IT network.
3. 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	Oct 2018	Safeguarding Policy Update	Brian Robinson
1.5	July/Aug 2019	Safeguarding Policy Update	Brian Robinson
1.6	Nov 2019	Policy Update	Brian Robinson
1.7	Dec 2019	Policy Update	Brian Robinson
1.8	Feb 2020	Policy Update	Brian Robinson

1.9 March 2020	Policy Update	Brian Robinson
1.10 October 2020	Policy Update	Brian Robinson/Legal



1.10.1 November/December 2020	Policy Draft Update	Brian Robinson/Legal
1.11.0 July /August 2021	Policy Update	Brian Robinson