



THE WALSALL FOOTBALL CLUB LIMITED

POLICY TITLE: SAFEGUARDING CHILDREN POLICY

INTRODUCTION

The Board of The Walsall Football Club Limited (“WFC”) acknowledges and accepts it has a statutory obligation and responsibility for the wellbeing and safety of all Children and young people who participate in WFC’s activities or utilise WFC’s facilities.

WFC’s Safeguarding Children Policy applies to senior managers and all staff, paid or volunteers, sessional workers, agency staff, interns / students or anyone working on behalf of WFC and will be given to all adults working with our children and young people.

The welfare of the child is paramount and all adults working at The Club have a ‘duty of care’ to safeguard the welfare of Children and young people by creating safe environments that protect them from harm. The policy may also be supplemented by in-service training and additional guidance.

LEGAL FRAMEWORK - RULES AND REGULATIONS

WFC is governed by statute law set out in the Children Acts 1989 and 2004, Working Together to Safeguard Children (2015 and 2018), Affiliated Football Policy and Procedures, English Football League (“EFL”) and Football Association (“FA”) Rules and guidance. WFC is fully committed to ensuring that the best practice recommended by these bodies is employed throughout the activities of WFC.

SAFEGUARDING CHILDREN POLICY

WFC’s Safeguarding Children Policy underpins all the activities delivered for the safe participation of Children and Young People. This policy will be reviewed annually or if there is a statutory legislative or organisational change or following any safeguarding incidents, concerns or allegations where the policy is found to be in need of updating to ensure the aims and key principles are still being met. All policy documents, and reviews will be put before the Board for approval at the following Board meeting.

DEFINITIONS

“Safeguarding” and promoting the welfare of children refers to the process of protecting children from maltreatment, preventing the impairment of health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children have the best outcomes.

“Child Protection” refers to the processes undertaken to protect children who have been identified as suffering, or being at risk of suffering, significant harm. The Children Act 1989 introduced Significant Harm as the threshold that justifies compulsory intervention in family life in the best interests of children. Physical Abuse, Sexual Abuse, Emotional Abuse and Neglect are all categories of Significant Harm.

A “Child” (collectively referred to as “Children”) is defined as anyone under the age of 18.



A “Parent” refers to birth parents and other adults who are in a parenting role, for example stepparents, foster carers and legal guardians.

“Staff” refers to all those working for or on behalf of the Club, full-time or part-time, temporary or permanent, in either a paid or voluntary capacity.

An “Activity” means any activity or series of activities arranged for a Child or Children by or in the name of WFC. These are deemed to be regulated and therefore activate the required levels of Criminal Record Checks that are associated.

Senior Safeguarding Officer (“SSO”) – Board Member responsible for overseeing safeguarding policies and procedures across WFC.

Designated Safeguarding Officer (“DSO”) – Responsible for implementing safeguarding policies and procedures across WFC.

SAFEGUARDING LEGISLATION AND GUIDANCE

The following safeguarding legislation and guidance has been considered when drafting this policy:

- Children Act 1989
- Children Act 2004 and Children and Families Act 2014
- Criminal Justice Act 1998
- UN Convention on the Rights of the Child
- The Human Rights Act 1998
- Sexual Offences Act 2003
- Safeguarding Vulnerable Groups Act 2006
- Equality Act 2010
- Serious Crime Act 2015 and Counter Terrorism and Security Act 2015
- Protection of Freedoms Act 2015
- Working Together to Safeguard Children 2017
- Keeping Children Safe in Education 2022
- What to do if you’re worried a child is being abused 2015
- Private Fostering Regulations 2015
- General Data Protection Regulations 2018
- Health & Safety Act at Work 1974
- Management of Health & Safety at Work Regulations 1999
- Female Genital Mutilation Act 2003
- The Children and Social Work Act 2017



AIMS & KEY PRINCIPLES

The aims of WFC's Safeguarding Children Policy are:

- To safeguard all Children and young people who interact with WFC.
- To demonstrate best practice in the area of safeguarding Children.
- To develop a positive and pro-active welfare programme to enable all Children and young people to participate in an enjoyable and safe environment.
- To encourage parents and other members of the Child or young person's family to be involved in a relationship with WFC.
- To promote high ethical standards throughout WFC by ensuring Responsible Adults who come in contact with our children and young people provide good role models of behaviour.

The key principles underpinning this policy are:

- The Child's welfare is, and must always be, the paramount consideration.
- All Children and young people have a right to be protected from abuse regardless of their age, gender, disability, culture, language, racial origin, religious beliefs or sexual identity.
- All allegations of abuse or poor practice will be taken seriously and responded to efficiently and proportionately.
- Working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare.

SENIOR SAFEGUARDING OFFICER / DESIGNATED SAFEGUARDING OFFICER

WFC has a SSO who has overall responsibility for overseeing the safeguarding of Children at WFC.

WFC also has DSO who has overall responsibility for implementing the policies and procedures for the safeguarding of children at WFC.

The DSO is the focal point for Safeguarding Children in WFC and will undertake regular monitoring and risk assessments of activities involving Children (or will designate this task to a trained activity lead, the Health & Safety Manager or an external assessor where appropriate).

Anybody with a concern about a Child or young person's welfare should contact the DSO direct or their line manager for advice in the first instance – details can be found at the end of this policy.

We will seek to keep children and young people safe by following good practice guidelines which include:

- Valuing everybody, listening to and respecting them
- setting a good example by conducting ourselves appropriately
- maintaining a child focus and involving children and young people in decisions that affect them
- adopting child protection practices through procedures and a code of conduct for staff and volunteers
- developing and implementing an effective e-safety policy and related procedures



- providing effective management for staff and volunteers through supervision, support and training
- recruiting staff and volunteers safely, ensuring all necessary checks are made
- sharing information about child protection and good practice with children, parents, staff and volunteers
- Sharing concerns with agencies who need to know and involving parents and children appropriately.
- Being alert to changes in children's behaviour and to signs of negative impact, abuse, neglect and exploitation
- Recognising that challenging behaviour may be an indicator of abuse
- Reading and understanding the Club's Safeguarding Policy, Staff Code of Conduct and guidance on wider safeguarding issues
- Being aware that the personal and family circumstances of some children and other issues of diversity (including disability and communication/learning differences) lead to an increased risk of abuse
- Sharing all concerns about a child's safety and welfare to the DSO without delay, or, if necessary, directly to police or children's social care

Abuse of position of trust

All staff are aware that inappropriate behaviour towards children is unacceptable and that their conduct towards them must be beyond reproach.

Staff understand that under the Sexual Offences Act 2003 it is an offence for a person over the age of 18 to have a sexual or intimate relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is deemed consensual. This means that any sexual activity between those in a position of trust and a young person under 18 may be a criminal offence and would be reported to the Local Authority Designated Officer (LADO).

Children who may be particularly vulnerable

Some children may be at increased risk of harm or abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to recognise concerning behaviour or to accept that abuse can occur. To ensure that all children involved in Club activities receive equal protection, we will give special consideration to those who are:

- Disabled or have communication and language differences
- Young carers
- Affected by parental substance misuse, domestic violence or parental mental health needs
- Asylum seekers
- Living away from home
- Vulnerable to being bullied, or engaging in bullying
- Living in temporary accommodation
- Live transient lifestyles
- Living in chaotic and unsupportive home situations



- Vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability, gender identity or sexuality
- At risk of sexual exploitation
- Do not have English as a first language
- At risk of female genital mutilation (FGM)
- At risk of forced marriage
- At risk of being drawn into extremism

This list provides examples of additionally vulnerable groups and is not exhaustive. Special consideration includes the provision of safeguarding information and resources in community languages when appropriate and accessible formats for children with communication support needs.

HUMAN RESOURCES & DISCLOSURE

Recruitment

As part of WFC's recruitment and selection process, offers of work for positions which involve working with Children are subject to a satisfactory Disclosure & Barring Service (DBS) Criminal Records Check (CRC) at the level deemed suitable for the position offered and subject to appropriate references.

Staff Training & Awareness

Written guidance to WFC employees and casual workers who come into contact with Children is provided at induction. The DSO will hold a specific Safeguarding & Safer Working Practice Induction with all new fixed-term, permanent starters and volunteers during which the key elements of WFC's Safeguarding Children Policy are discussed in more detail and specifically to the individuals' role.

All staff working in direct contact with Children are required to complete the FA's 3-hour Safeguarding Children Awareness workshop and undertake a refresher course, as advised by the FA, at least once every 2 years. Details of all training qualifications and annual WFC refresher training are retained by the DSO.

A continual programme of Safeguarding Awareness courses is also provided by WFC to develop knowledge which are department specific. Staff will also complete any necessary Safeguarding Training as advised by the EFL.

All staff will also receive safeguarding updates via email, e-bulletins, newsletters, website access and staff meetings throughout the year. Awareness for all is important in Safeguarding, the Club will continue to make children, parents and staff aware particularly around online safety.

Volunteers

Volunteers will undergo DBS checks commensurate with their role and responsibilities in the Club, their contact with children and adults at risk and the supervision provided to them. Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised.

Work Experience



WFC may from time to time offer work experience placements to young people. WFC will provide forwardly planned and structured work experience placements. Whilst undertaking work for WFC, those on work experience will not have unsupervised access to Children.

Contractors

Where applicable external contractors engaged by WFC must undergo a suitability test prior to commencing work. This will include evidencing the contractor's Safety Record, Safety Policy, Liability Insurance, Risk Assessment/Method Statement and details of Competent Person. On arrival at WFC, the contractor will receive a site induction from the DSO or Health and Safety Manager who covers Safeguarding Children and give details of the Club's expected code of behaviour.

Contractors are subject to regular inspection from WFC personnel. In the event of a Contractor carrying out work on an area that is usually occupied by Children this work, where possible, will be undertaken when Children are not present.

Site Security

Visitors to the Club, including contractors, are asked to sign in and are given a blue badge, which confirms they have permission to be on site. All visitors are expected to observe the Club's safeguarding and health and safety regulation.

Service Level Agreements / Partnership Agreements

WFC's commitment to Safeguarding is outlined in any partnership agreements, service level agreements or any other agreements that are in place with any facility or service provider or for commissioned services insofar as those services relate to Children. Agreements will clearly define roles, responsibilities and procedures for safeguarding Children before, during and after the delivery of those services.

Off-site arrangements, trips and visits

All extended and off-site activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. Where Club activities are provided by and managed by the Club, our own child protection policy and procedures apply.

When our children are involved in off-site activities facilitated or organised by the Club, including day and residential visits and work-related activities, we will check that effective safeguarding and child protection arrangements are in place.

Staff/Children/Adults at risk online and electronic communication

The Club provides advice to staff and volunteers regarding their personal online activity and electronic communication. Walsall Football Club has strict rules regarding online contact and electronic communication with participants and service users (children/adults at risk). Staff found to be in breach of these rules may be subject to disciplinary action and/or internal/external investigation.

DISCLOSURE AND BARRING SERVICE

WFC are registered with the DBS to carry out Criminal Record Checks on individuals who work for WFC, including the Academy and The Walsall FC Foundation Programme. Enhanced CRCs, plus barred list



check where appropriate, enable WFC to undertake more thorough recruitment and selection procedures for positions involving work with Children.

PROCESS FOR DISCLOSURE & BARRING SERVICE CHECKING

New Appointments

All staff that are offered a position which involves working with Children in Regulated Activity will be required to complete a Self-Declaration Form and also undertake an Enhanced CRC with a barred list check where appropriate.

All offers of work are subject to the outcome of the screening process and where applicable, this is set out in the initial job advertisement and the applicant's offer of work. Until such time as a satisfactory CRC has been received, the member of staff will not be permitted to work with Children.

Should a positive CRC be received, a risk assessment will be carried out by the WFC SSO and DSO or HR Manager, to assess the information contained within the CRC.

The member of staff may also be asked to attend an interview prior to a recruitment decision being made. The Rehabilitation of Offenders Act and Protection of Freedoms Act should be considered in all cases before a final decision is made.

New Appointments who already have a CRC

If a new member of staff has been subject to a CRC check by their previous employer WFC will still require a further check either by new application or use of the DBS Update service.

Temporary Staff and External Consultants

WFC will ensure that all temporary staff and external consultants sign a Self-Declaration Form where appropriate and, in any case, will not have unsupervised access to Children during their time with the Club.

EQUAL OPPORTUNITIES

WFC is committed to providing equal opportunities to staff and therefore a positive CRC will not necessarily result in a bar from work or volunteering. A copy of WFC's policy on equal opportunities can be obtained from the Management Team.

RATIOS AND SUPERVISION OF CHILDREN

Any Activity undertaken by WFC will always give full consideration to the appropriate number of staff members available depending on the age of the Children involved, the degree of risk the Activity involves, and whether there are any additional needs for the group of participants. The lower the age of the participants, the greater the need for supervision.

Regardless of these ratios a minimum of 2 members of staff or delivery partner will always be available to supervise an Activity. This ensures at least basic cover in the event of something impacting on the availability



of one of the adults during the Activity (e.g. in the event of a participant requiring the attention of an adult during the Activity following an accident).

- 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 should be no more than 1:10, but this varies depending on the Activity. Advice should be sought from the Children's Services' Officer if unsure.

LONE WORKING GUIDANCE

Working 1:1 with children or young people should only happen in exceptional circumstances. When it does happen staff should request and follow specific guidance from the DSO.

GIFTS & FAVOURITISM

Staff should take care that they do not accept any gift that might be construed as a bribe by others, or lead the giver to expect preferential treatment.

WFC recognises that there are occasions when Children or parents wish to pass small tokens of appreciation to staff, for example at Christmas or as a "thank you", and this is acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value as this may be misinterpreted by others. Staff should report any gifts received to their line manager.

Similarly, it is not permitted for staff to give personal gifts to Children. This could be misinterpreted as a gesture either to bribe, or to single out the Child. It might also be perceived that a "favour" of some kind is expected in return.

Any reward given to a Child must first be agreed with the staff member's line manager as part of a structured reward system and not based on favouritism.

USE OF IMAGES

WFC takes its guidance on the use of images from guidelines issued by the Local Safeguarding Children Board and The FA:

- Before taking images of Children, parental consent is sought in writing at the start of the financial year or prior to the event or session. Parents/Carers/Guardians are responsible for informing WFC of any change of circumstances which may affect consent.
- Parents/Carers/Guardians will be informed of how the image will be used. WFC will not allow an image to be used for something other than that for which it was initially agreed.
- All Children featured in WFC publications will be appropriately dressed.
- Where possible, the image will focus on the activity taking place and not a specific Child.
- Where appropriate, images represent the broad range of people participating safely in the event.
- Designated WFC photographers will, where applicable, undertake a DBS check and attend a Safeguarding Children workshop and in any case will be personally responsible for keeping up to



date with the latest guidelines on the Use of Images policies from the Local Safeguarding Children Board.

- WFC Identification will be worn at all times.
- Children who are under a court order will not have their images published in any WFC document.
- No images of Children featured in WFC publications will be accompanied by personal details such as their school or home address.
- Recordings of Children for the purposes of legitimate coaching aids are only filmed by WFC officials and are stored safely and securely at the WFC's premises.
- Any instances of inappropriate images should be reported to the DSO.
- WFC does not put young peoples' profiles with images and personal information on its website.

TRANSPORT

WFC has a Transport policy and should be followed when Children are being transported on behalf of the WFC. Children shall be accompanied and supervised at all times by the Activity leader. Only Vehicles and Drivers approved under the WFC's Transport Policy will be used to transport children. Under no circumstances should a member of staff use a private vehicle to convey children engaged on an Activity being delivered by WFC.

MEDICAL

There may be occasions where medical treatment is necessary during an Activity or event. WFC will ensure a level of medical cover is available during all of its activities including at least one suitably trained Emergency Aider. All relevant and necessary medical information of participants will be treated in confidence but provided to the Event Lead if necessary, e.g. asthmatic participants. Specialist medical advice and further information must be sought when working with children who have special needs or disability.

GUIDELINES IN THE EVENT OF CONCERN

Highlighting Concern

Although WFC is committed to doing the utmost to safeguard Children from harm there may be occasions when concern is raised over the treatment of a Child.

"Child abuse" and "neglect" are generic terms encompassing all ill treatment of Children as well as cases where the standard of care does not adequately support the Child's health or development. Children 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 Child and may be of the same or opposite sex. There is often a common misconception that only a certain type of person can abuse Children but this is simply not the case – abuse can take place in any setting, by someone of either sex, of any sexual orientation and of any age.

Recognition – Signs of Abuse

To ensure that our children are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.



Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example for leaving a small child home alone.

Abuse may be committed by adult men or women and by other children and young people.

Indicators of abuse are:

Physical Abuse: 'Physical abuse' may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a Child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a Child. A person might do this because they enjoy or need the attention, they get through having a sick Child. Physical abuse can be caused through omission or the failure to act to protect.

Sexual Abuse: Sexual abuse involves forcing or enticing a Child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the Child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving Children in looking at, or in the production of, sexual images, watching sexual activities, encouraging Children to behave in sexually inappropriate ways, or grooming a Child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other Children.

Neglect: Neglect is the persistent failure to meet a Child's basic physical and/or psychological needs, likely to result in the serious impairment of the Child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a Child is born, neglect may involve a parent or carer failing to provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a Child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a Child's basic emotional needs.

Emotional Abuse: Emotional abuse is the persistent emotional maltreatment of a Child such as to cause severe and persistent adverse effects on the Child's emotional development. It may involve conveying to Children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the Child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on Children. These may include interactions that are beyond the Child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the Child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing Children frequently to



feel frightened or in danger, or the exploitation or corruption of Children. Some level of emotional abuse is involved in all types of maltreatment of a Child, though it may occur alone.

Bullying: Bullying is not always easy to define and can take many forms. The three main types are: physical, verbal and emotional. Bullying can also take the form of online Cyber bullying where technology and The Internet is used to post or share derogatory comments and/or pictures of children which cause them alarm or distress, in applications or social media.

WFC has a zero-tolerance approach to bullying and any reported incidents of bullying by a staff member to a Child, Child to staff member or Child to Child will be taken seriously and investigated by the DSO.

All Staff at WFC are made aware that mental health problems can be an indication of abuse, neglect or exploitation. Whilst WFC staff are not qualified to diagnose mental health problems, staff are well placed to identify behaviour of individuals that may indicate a child is either experiencing mental health problems or at risk of developing one.

Staff should immediately raise concerns with the DSO or SSO and follow the Club's procedures. Staff should also be aware of adverse experiences like abuse and neglect can have a lasting impact on a child's mental health, behaviour and education.

Serious Violence: All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school and football, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs. Staff should be aware of the associated risks and understand the measures in place to manage these. Advice is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults.

RESPONDING TO A REPORT OR SUSPICION

Where possible WFC's DSO or Event Lead should be contacted as early as possible, however it is recognised that an individual may need to respond to a situation immediately. With this in mind the following guidelines offer help and support in responding to abuse or a suspicion of abuse:

Do:

1. Treat any allegations extremely seriously and act at all times towards the Child as if you believe what they are saying, although do not directly say the words "I believe you".
2. Tell the Child they are right to tell you.
3. Reassure the Child that they are not to blame.



4. Be honest about your own position, who you have to tell and why.
5. Tell the Child what you are doing and when, and keep them up to date with what is happening.
6. Take further action – you may be the only person in a position to prevent future abuse.
7. Write down everything said and what was done (handwritten is preferable) and sign and date the notes. Raise concern on Club's Electronic Safeguarding Case Management Software system as soon as possible from when the incident has been reported and pass notes to Club DSO. Once complete the Club's Safeguarding Team are made aware of the concern raised by receiving an email.
- 8 Seek medical advice if necessary.

Don't:

1. Make promises you cannot keep.
2. Interrogate the Child – it is not your job to carry out an investigation – this will be up to the Police and Children's Social Care, who have experience in this.
3. Cast doubt on what the Child has told you, don't interrupt or change the subject.
4. Say anything that makes the Child feel responsible for the abuse.
5. Inform parents / carers – the Safeguarding Officer will make this decision based on whether there is suspicion of their involvement.

DOING NOTHING IS NOT AN OPTION; IT IS YOUR RESPONSIBILITY TO ACT.

Make sure you tell WFC's DSO or SSO immediately, they will know how to follow this up and where to go for further advice. Where required, update Club's Electronic Safeguarding Case Management Software.

RECORDING ALLEGATIONS OR SUSPICIONS

The DSO will immediately report any allegation to the SSO, who will ask for a written factual statement from the person making the report. An Incident Report Form must be completed and submitted within 24 hours to the DSO or SSO. A log will be completed to record all incidents raised and paperwork will be stored securely. Data will be shared in line with the Data Protection Act 2018 and GDPR. Staff and Parents should be confident of the processing conditions under the Data Protection Act 2018 and GDPR which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal and should be treated as "special category personal data".

Any statement made by the Child should be reported in their own words. These reports should be confined to facts. Any opinion, interpretation or judgment should be clearly stated as this.

WFC will ensure that any Child concerned is immediately removed from any possible risk of harm.

Investigations into possible abuse will require careful management. In these cases, the SSO will first seek the advice of the Safeguarding Children Team, Children's Social Care, a Local Authority Designated Officer (LADO) or the Police before setting up an internal inquiry and take their advice on informing the Child's



parents. In any case of suspected abuse, as soon as the Local Authority or the Police have been informed, the Trust must provide a report to the WFC Board.

The Club SSO will also inform the The FA Safeguarding Case Management Team and EFL in writing as required under the Affiliated Football policy and procedures using the appropriate notification form.

Providing it is appropriate to do so, the SSO will maintain constant dialogue with all parties involved with the allegation until such time as the matter has reached a reasonable outcome.

SPECIFIC INFORMATION REGARDING ALLEGATIONS AGAINST MEMBERS OF STAFF

If the report involves an allegation about any member of staff (whether full time, part time, paid, unpaid, contracted, engaged, voluntary etc.) and WFC believe that the report could demonstrate that the member of staff in question has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

the SSO or Board shall immediately inform the LADO of the Borough where the person in a position of trust is employed so that he or she can consult with the Police and local authority children's social care colleagues as appropriate. Where the SSO or Trustees are unsure as to whether the report meets the criteria stated above, the advice of the LADO shall still be sought.

The SSO will also inform the FA Safeguarding Case Management Team and EFL in writing as required under the Affiliated Football policy and procedures using the appropriate notification form.

The member of staff in question may be asked to write a brief report, as may any other person that is deemed to have an involvement in the allegation. This process would only be carried out once the advice of the above mentioned external bodies and The FA Case Management Team had been sought and only then in consultation with the SSO or Board. Providing it does not contradict with any advice received from the LADO or The FA, any internal investigation will be carried out in line with WFC's Disciplinary Policy and either general or Grievance Procedures, as applicable.

The SSO will also consult with The FA Safeguarding Case Management Team and EFL under the Affiliated Football policy and procedures.

Confidentiality

There is always tension and caution around issues of confidentiality. The advice for all staff WFC is that no guarantee of confidentiality can be given to a Child (although this does not necessarily mean that the parents / carers have to be told).



A Child should never be pressured to give information or show physical marks unless they do so willingly. If they chose to show markings, two members of staff should be present.

There are actions which staff have to and are obliged to take once we are aware of a problem. Undertakings of confidentiality should not be given either to the person making the allegations or to the person being interviewed. A matter is confidential on a need to know basis and nobody should have any reservations about referring any issue to the DSO. The key issue is that the welfare of the Child is protected.

Referral to children's social care

The DSO or SSO will make a referral to children's social care if it is believed that a child is suffering or is at risk of suffering significant harm. The child (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child. Any member of staff may make a direct referral to children's social care if they believe independent advice and action is necessary to protect a child.

Reporting directly to Child Protection Agencies

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care, police or the NSPCC if:

- The situation is an emergency and the DSO and SSM are unavailable
- They are convinced that a direct report is the only way to ensure the child's safety
- For any other reason they make a judgement that direct referral is in the best interests of the child

Peer on peer abuse

Children may be harmed by other children or young people. Staff will be aware of the harm caused by bullying and will use the Club's anti-bullying procedures where necessary. However, there will be occasions when a child's behaviour warrants a response under child protection rather than antibullying procedures.

Peer on peer abuse can take many forms, including:

- **Physical** abuse such as shaking, biting, hitting, kicking, hair pulling or otherwise causing physical harm.
- **Sexually harmful behaviour/sexual abuse** such as inappropriate sexual language, touching, sexual assault
- **Sexual Violence such as rape, assault by penetration and sexual assault.**
- **Sexting** including pressuring another person to send a sexual imagery or video content
- **Teenage relationship abuse** – defined as a pattern of actual or threatened acts of physical, sexual or emotional abuse, perpetrated against a current or former partner



- **Initiation/hazing**- used to induct newcomers into an organisation such as sports team or school groups by subjecting them to a series of potentially humiliating, embarrassing or abusing trials which promote a bond between them
- **Prejudiced behaviour** – a range of behaviours which causes someone to feel powerless, worthless or excluded and which relates to prejudices around belonging, identity and equality, in particular prejudices linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity.
- **Upskirting** – this is when a person takes a picture under another person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or harm.

Abuse is abuse and should never be tolerated or passed off as “banter” or “part of growing up”. Different gender issues may be prevalent when dealing with peer on peer abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence.

At our Club, we take the following steps to minimise or prevent the risk of peer on peer abuse:

- We will seek to promote an open and honest environment where young people feel safe to share information about anything that is upsetting or worrying them.
- Induction processes are used to provide a moral framework outlining codes of conduct, acceptable behaviour and stressing the effects of bullying.
- Staff will endeavour always to create surroundings where everyone feels confident and at ease in the Club.
- We will ensure that Club activities are well supervised by appropriate and qualified staff and volunteers.

All allegations of peer on peer abuse should be passed to the DSO immediately. They will then be investigated and dealt with as follows:

- **Information gathering** – children, staff and witnesses will be spoken with as soon as possible to gather relevant information quickly to understand the situation and assess both the impact and whether there was intent to cause harm.
- **Decide on action** – if it is believed that any young person is at risk of significant harm, a referral will be made to children’s social care. The DSO will then work with children’s social care to decide on the next steps, which may include contacting the police.
- **Inform parents** – as with other concerns of abuse, the school will normally seek to discuss concerns about a child with parents. Our focus is the safety and wellbeing of the child and so if the Club believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children’s social care and/or the police before parents are contacted.



Supporting those involved

The support required for the child who has been harmed will depend on their circumstance and the nature of the abuse. Support could include counselling, mentoring, the support of family and friends and/or support with improving peer relationships or some restorative justice work.

Support may also be required for the child that exhibited harmful behaviour. We will seek to understand why the child acted in this way and consider what support may be required to help the child change behaviours. Once those needs have been met, the consequences for the harm caused or intended will be addressed with them in partnership with parents and external agencies as required.

Sexting

There is no accepted definition of “sexting” but most professionals agree that it refers to the sending or posting of sexually suggestive images, including nude or semi-nude photographs of a person under 18 years of age, via mobiles or over the internet. The UK Council for Child Internet Safety defines sexting as the production and/or sharing of sexual photos and videos of and by young people who are under the age of 18. It includes nude or nearly nude images and/or sexual acts. It is also referred to as “youth produced sexual imagery”.

“Sexting” does not include the sharing of sexual photos and videos of under-18-year olds with or by adults. This is a form of child sexual abuse and must be referred to the police.

Guidance for staff and volunteers dealing with sexting incident/disclosure:

- The incident should be referred to the DSO immediately and the DSO will clarify the concerns with any staff involved in reporting and ensure concerns are accurately recorded.
- Never view, download or share the imagery yourself, or ask a child to share or download – this is illegal.
- If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to) report this to the DSO.
- Do not delete the imagery or ask the young person to delete it.
- Do not ask the young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSO.
- Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- Do not say or do anything to blame or shame any young people involved.
- Do explain to them that you need to report it and reassure them that they will receive support and help from the DSO.
- If there is a concern a young person has been caused distress, harmed or is at risk of harm a referral will be made to the police immediately. The police do not seek to criminalise young people but take sexting very seriously and will take appropriate action which may include seizure of



devices and speaking to the young people involved. On-line abuse through sexting can have very serious consequences and undertaking an investigation at Club level can lead to images and evidence being deleted which prevents appropriate action being taken to support and/or educate those involved or impacted by these issues. Parents will be informed at an early stage and involved in the process unless the police advise against this or there is a good reason to believe that involving parents would put the young person at risk of harm.

Sexual exploitation of children

Sexual exploitation involves an individual or group of adults taking advantage of the vulnerability of an individual or groups of children or young people, and victims can be boys or girls. Children and young people are often unwittingly drawn into sexual exploitation through the offer of opportunities, future career gains, friendship and care, gifts, drugs and alcohol and sometimes accommodation. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking.

A common feature of sexual exploitation is that the children often don't recognise the coercive nature of the relationship and therefore do not see themselves as a victim. In some cases parents/guardians also fail to recognise that a relationship is potentially abusive and both the child and their carers may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

All staff are made aware of the indicators of sexual exploitation and all concerns are reported immediately to the DSO.

Criminal Exploitation

Criminal Exploitation is child abuse where children and young people are manipulated and coerced into committing crimes. Child Criminal Exploitation is common in county lines. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology. Criminal exploitation of children is broader than just county lines, and includes for instance children forced to work on cannabis farms or to commit theft.

County Lines

County Lines is the organised criminal distribution of drugs by gangs from the big cities into smaller towns and rural areas using Children, Young People and Adults at Risk. Gangs recruit Children, Young People and Adults at Risk through deception, intimidation, violence, debt, bondage and/or grooming. Gangs also use local property as a base for their activities, and this often involves taking over the home of an Adult who is unable to challenge them. County line gangs pose a significant threat to Children, Young People and Adults at Risk upon whom they rely to conduct and/or facilitate such criminality.

Cuckooing

Cuckooing is a term often linked to county lines. Cuckooing is when gangs establish a base in the



location, location, they are targeting for drug dealing and to operate their criminal activity from, often taking over the homes of adults at risk by force or coercion. People exploited in this way will quite often be exposed to physical, mental and sexual abuse, and in some instances will be trafficked to areas a long way from home as part of the network's drug dealing business. Victims of 'cuckooing' are often drug users but can include older people, those suffering from mental or physical health problems, female sex workers, single mums and those living in poverty. Victims may suffer from other forms of addiction, such as alcoholism.

Honour-Based Violence

"Honour-based" violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of HBV are abuse.

FGM is the collective name given to a range of procedures involving the partial or total removal of external female genitalia for non-medical reasons. In England, Wales and Northern Ireland, the practice is a criminal offence under the Female Genital Mutilation Act 2003. The practice can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by a girl of any age about going on a long holiday during the summer vacation period.

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse. In England and Wales the practice is a criminal offence under the Anti-Social Behaviour, Crime and Policing Act 2014. The reporting of any concerns about either suspected forced marriage or FGM is mandatory.

A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

Children may be married at a very young age, and well below the age of consent in the UK which would make it unlawful in relation to a UK citizen. Relevant Club staff receive training and should be particularly alert to suspicions or concerns raised in relation to a young person who is being taken abroad and may be anxious or prevented from returning to the UK.

Radicalisation and Extremism

Radicalisation is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups or activities.



The government defines extremism 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” (HM Government Prevent Strategy).

Some children are at risk of being radicalised; adopting beliefs and engaging in activities which are harmful, criminal or dangerous. Islamic extremism is the most widely publicised form however staff should also remain alert to the risk of radicalisation into white supremacy extremism.

“Prevent” is a cross-Government policy that forms one of the four strands of the UK’s strategy for counter terrorism which includes the prevention of radicalisation of vulnerable adults and children. Those who are targeted with a view to radicalise them are often the most vulnerable in society including those with poor networks of support of who are experiencing socially isolated, mental health issues and/or learning and communication issues.

Keeping children safe from these risks is a safeguarding matter and should be approached in the same way as safeguarding children from other risks.

If the behaviour of anybody involved in our activities indicates that they or those around them are at risk of harm, staff should report these concerns immediately to the DSO. In the event that there appears to be an immediate risk or danger call 999.

Private Fostering Arrangements

A private fostering arrangement occurs when someone other than a parent of a close relative cares for a child for a period of 28 days or more, with the agreement of the child’s parents. It applies to children under the age of 16 or aged under 18 if the child is disabled. By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children’s services as soon as possible.

Where a member of staff becomes aware that a child may be in a private fostering arrangement, they will raise this with the DSO and the Club will notify the local authority who will check whether the arrangement is suitable and safe for the child.

Looked after children

The most common reason for children becoming looked after (taken into care) is as a result of abuse or neglect. Children’s early experiences have a significant impact on their development and future life chances. As a result of their experiences, both before and during care, looked after children are at greater risk that their peers.

Appropriate staff will be informed about a child’s looked after legal status and care arrangements, including the level of authority delegated to the carer by the local authority looking after the child. Any indicators or signs that a looked after child may require additional support or protection must be reported without delay to the DSO who will share concerns with the Local Authority without delay.



Related safeguarding portfolio policies

This policy should be read during the Staff Induction Process and alongside our other Club safeguarding policies and procedures:

- Safeguarding Adults Policy
- Photography and digital images Policy
- Whistle blowing Policy
- Complaints Policy
- Anti-bullying Procedures
- Staff and Volunteers Code of Conduct
- Data Protection Policy
- Transport Policy
- Equality and Diversity Policy
- Trips, Tours and Tournaments Policy
- Health and Safety Policy
- Safer Recruitment Policy
- Mascots Policy
- Host Families Policy
- Changing Facilities Policy
- Scouts Policy
- Social Media Policy
- Low Level Concern Policy

Sharing Concerns and Reporting Contact Details

All concerns should be recorded as soon as possible. Records should include the date, time relating to the welfare of any child, whether these concerns arise outside of or within Club activities, should be shared and advise sought without delay. Wherever possible, please have as many relevant details to hand e.g. full name, date of birth and address of child, siblings and parents; full details of the concern etc. but do not let a lack of detail block you from reporting.

CLUB CONTACT DETAILS

SENIOR SAFEGUARDING OFFICER:

Stefan Gamble WFC Chief Executive Officer/Director



Phone: 01922 622 791
Email: stefan.gamble@walsallfc.co.uk

DESIGNATED SAFEGUARDING OFFICER:

Nick Adshead Academy Secretary and Designated Safeguarding & Inclusion Officer
Phone: 01922 622 791
Email: nick.adshead@walsallfc.co.uk

FOUNDATION DESIGNATED SAFEGUARDING OFFICER:

Adam Davy Community Director and Trust Designated Safeguarding Officer
Phone: 01922 644 742
Email: adam.davy@walsallfc.co.uk

EXTERNAL LOCAL CONTACT DETAILS

Walsall Safeguarding Partnership

<https://go.walsall.gov.uk/walsall-safeguarding-partnership/>

If you suspect that a child or young person is being, or is at risk of being significantly harmed as a result of abuse or neglect, you must report this immediately:

To report a concern about a child call Multi-Agency Safeguarding Hub during office hours (Monday to Thursday 8.45am – 5.15pm and Friday 8.45am – 4.45pm) call 0300 555 2866.

Out of office hours (evenings, weekends and bank holidays) call the Emergency Response Team on 0300 555 2922.

To make a child protection referral, please send all information to the MASH using the Multi-Agency Referral Form (MARF). The MARF can be downloaded [West Midlands Regional Procedures](#) and please send your completed form to MASH@walsall.gov.uk

Please refer to the following video for help, support and guidance:

<https://www.youtube.com/watch?v=0GINgFGRI1k>

If you believe, a child is in immediate danger call the Police on 999.

To follow up a concern with the LADO with Walsall Safeguarding Partnership contact 07432 422205 or 01922 654040 or lado@walsall.gov.uk

EFL (English Football League)

Alexandra Richards EFL Safeguarding Manager
Phone: 07792 284740
Email: arichards@efl.com



THE FA / NSPCC HELPLINE: 0808 800 5000 / Textphone: 0800 056 0566

Birmingham County FA

Sarah Willis Designated Safeguarding Lead
Phone: 0121 357 4278
Email: support@birminghamfa.com

NSPCC SMS: 88858

EXTERNAL RESOURCES

FA Safeguarding Children Guidelines:

<https://www.thefa.com/football-rules-governance/safeguarding>

Information Sharing Guidance for Managers and Practitioners:

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

Working Together to Safeguard Children:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/942454/Working_together_to_safeguard_children_inter_agency_guidance.pdf

Keeping Children Safe in Education 2022

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1101454/Keeping_children_safe_in_education_2022.pdf

Club Safeguarding Policy Amendment- Covid 19

Walsall Football Club

This amendment should be read in conjunction with the Club Safeguarding Policy, Staff Code of Conduct and Player Code of Conduct.

Club statement:



The way in which our football Club is currently operating in response to coronavirus (COVID-19) is fundamentally different to business as usual, however, a number of our important safeguarding principles remain the same:

- with regard to safeguarding, the best interests of children will always continue to come first
- if anyone has a safeguarding concern about any child connected to the Club they should continue to act and act immediately
- a Designated Safeguarding Officer or Deputy will always be available
- unsuitable people are not allowed to enter the Club workforce and/or gain access to children
- children continue to be protected when they are online

Club Safeguarding Contacts:

During the Covid-19 lockdown period the Safeguarding contacts for the Club are as follows:

Stefan Gamble, Chief Executive Officer and Senior Safeguarding Manager

Email: stefan.gamble@walsallfc.co.uk or 01922 622791

Nick Adshead, Academy Secretary and Designated Safeguarding Officer

Email: nick.adshead@walsallfc.co.uk or 07884 664286

Remember that in an emergency or where there is risk to life you should contact the police immediately.

Other Safeguarding contacts in football:

Whilst any safeguarding concern should be raised with the Club Safeguarding contacts in the first instance, we recognise that this may not always be possible or appropriate. Below are the contact details for footballing partners with whom safeguarding concerns in relation to the Club can be discussed:

The English Football League Safeguarding Team

Tel: 01772 325940

Email: safeguarding@efl.com

If there are any concerns with regard to a person in employed in football regarding their conduct towards a child please refer them to The FA Safeguarding Team.

Tel: 0800 169 1863

Email: Safeguarding@TheFA.com

Procedures and Safety Measures for online learning:

The Club expects all staff and players to adhere to the relevant policy boundaries must be maintained at all times. We have put extra measures in place to reduce the risks in relation to online learning which include:



- All contact online being observable and interruptible
- Staff and children must wear suitable clothing as should anyone else in the household
- Any computers being used should be in appropriate areas, for example not in bedrooms and the background should not be blurred
- Online teaching will not be carried out on a one to one basis and will be done in a group setting with several players present,
- Another adult will be invited to be present in the room
- All communication provided will have an educational purpose
- Language must be professional and appropriate, including any family members in the background
- The Club will record online teaching/instruction sessions. Players and parents will be informed that sessions are being recorded in advance of doing so.
- All sessions provided will be via the Clubs I.T platform (for example remote desktop) or Wi-Fi (where possible)

Mental health:

Negative experiences and distressing life events, such as the current circumstances, can affect the mental health of us all. Players who are struggling under the current circumstances should contact the Club safeguarding staff as outlined above. Support can also be accessed through a number of national organisations including:

The Samaritans	Tel: 116 123	https://www.samaritans.org
ChildLine:	Tel: 0800 1111	https://www.childline.org.uk
NSPCC:	Tel: 0808 800 5000	https://www.nspcc.org.uk
Mind:	Tel: 0300 123 3393	https://www.mind.org.uk
PFA:	Tel: 07500 000 777	https://www.thepfa.com/wellbeing

Online safety:

It is important that internet safety and security messages are re-enforced during this time when we are expecting young people to be online more often. They may also be increasing their usage on devices during their own free time during this lockdown period. It is important that both players and parents are aware of the help and support available should they be concerned about something they have seen or experienced online. These include:

UK Safer Internet Centre	https://reportharmfulcontent.com/
CEOP	https://www.ceop.police.uk/safety-centre/
Internet Matters	https://www.internetmatters.org/
NetAware	https://www.net-aware.org.uk/
ParentInfo	https://parentinfo.org/
ThinkuKnow	https://www.thinkuknow.co.uk/



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