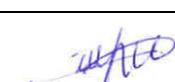
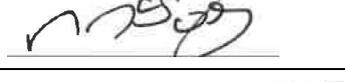




SAFEGUARDING CHILDREN POLICY

Season 18/19

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Distribution

This policy will be available for all staff to view on Fulham FC's Intranet.

Managers of staff without direct access to Fulham FC's Intranet must provide access to an up to date paper copy of the policy.

Fulham Football Club

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1. Introduction

- 1.1. Fulham Football Club (“the Club”) and Fulham Foundation (FFCF) are committed to safeguarding and protecting children and young people. They fully accept responsibility for the wellbeing and safety of all children and young people who are under their care.
- 1.2. All children have the right to protection from all forms of abuse and exploitation and it is the duty of all staff and volunteers, paid or unpaid at the Club of FFCF to safeguard children and young people by creating an environment that protects them from harm. This policy also extends to all players and participants of the Club and FFCF.
- 1.3. The wellbeing of children and young people is paramount for all staff and accordingly, they must make themselves aware of the Club and FFCF’s Safeguarding Children Policy. Where appropriate, the policy will be supplemented by in-service training and additional guidance. All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately.

2. Rules, Regulations & Legislation

- 2.1. This policy is in accordance with LSCB guidelines and is compliant with regulations set out in the 1989 and 2004 Children Act, Working Together to Safeguard Children (2018), the London Child Protection Procedures (2018), FA Safeguarding Procedures and Premier League and Football League Rules and guidance. In addition the following principles, legislation, rules, regulations and guidance underpin the Safeguarding Policy:
 - Premier League Safeguarding Standards 2018-19
 - Affiliated Football Safeguarding Policy and Procedures (2014)
 - What to do if you’re worried a child is being abused: Advice for Practitioners (2015)
 - Safeguarding Vulnerable Groups Act 2006
 - Protection of Freedoms Act (POFA) 2012
 - Keeping Children Safe in Education (KCSIE) 2016
 - Female Genital Mutilation Act (2013)
 - Sexual Offences Act (2003)
 - UN Convention on the Rights of the Child (1989)
 - The Equality Act (2010)
 - Data Protection Act (1998)
 - London Child Protection Procedures and Practice Guidance 2017
- 2.2. The Club and FFCF is fully committed to ensuring that the best practice recommended by these bodies is employed throughout service delivery. The Club and FFCF have a responsibility to maintain regular dialogue with the Local Safeguarding Children Board. Due to their contact with children, staff are well placed to observe changes in a child’s behaviour and outward signs of abuse and/or neglect.
- 2.3. This policy is one of a series in a suite of Club and FFCF Safeguarding Policies and Procedures. This policy should be read in conjunction with the following:
 - Fulham FC Safeguarding Strategy
 - Safeguarding Adults Policy
 - Fit for Purpose Policy
 - Recruitment Policy (including safer recruitment practice)
 - Equal Opportunities Policy
 - Employing/Engaging Workers Under 18
 - Anti-Bullying Policy
 - Use of Images Policy and Guidance

- Medical / Strength and Conditioning Code of Conduct for use when dealing with Children and Young Players 2018/19
- Complaints Policy and Procedure
- Guidance for accommodating u18's travel
- Driving At Work Policy
- Academy Transport Policy
- Whistleblowing Policy
- Ethics in Business Policy
- Grievance and Disciplinary Policy
- Incident Reporting Policy
- Incident Escalation Process
- Offensive Weapons, Drugs and Violence Policy

3. Scope & Governance

3.1. This policy is for use across the Club and FFCF and has been adopted by senior executives and management of the Club and FFCF including its Trustees. Both Club and FFCF are committed to prioritising safeguarding at a strategic level to ensure best practice in safeguarding is promoted and adhered to.

3.2. All safeguarding information is stored and retained in line with the Club's Privacy Policy. This includes guidance for data storage under the General Data Protection Regulation.

3.3. Activities undertaken at the following locations/departments are under the remit of this policy including:

- Fulham Foundation including all activities on external sites
- Fulham First Team and Academy training ground (Motspur Park);
- Fulham Ladies Football Club;
- Fulham Soccer Schools;
- Craven Cottage Stadium;
- Fulham Academy Scholars and Talent Centres;
- Fulham Retail Stores;
- Stadium Tours, My First Match Day, Stewarding and all other activities on match days and roles that come in to contact with children and young people;
- Travel, Events and Support Liaison;
- Other Club related entities/activities undertaken outside of the UK.

4. Definitions

4.1. A 'child' is defined as anyone who has not yet reached their 18th birthday. 'Children' therefore means 'children and young people' throughout.¹

4.2. Safeguarding and promoting the welfare of Children is defined² for the purposes of this policy as:

- protecting children from maltreatment;
- preventing impairment of children's 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 to have the best outcomes.

¹ Working Together to Safeguard Children, 2015

² Working Together to Safeguard Children, 2015

- 4.3. An “**Activity**” means any activity or series of activities arranged for children by or in the name of a Club. These are deemed to be regulated and therefore activate the required levels of DBS³ checks.

5. Aims & Key principles

5.1. The aims of the Safeguarding Children Policy are to:

- safeguard all children who interact with the Club and FFCF;
- demonstrate best practice in the area of safeguarding children;
- positively reflect and promote the Club and FFCF Values (**Pioneers, Confident Custodians, Action Orientated, Open & Inclusive and Service Excellence**) in regard to safeguarding children;
- ensure that children feel safe in our activities;
- commit to working in partnership across the Club and FFCF with external organisations including statutory bodies and local schools in order to safeguard and protect children and young people;
- develop a positive and pro-active welfare programme to enable all children to participate in an enjoyable and safe environment;
- ensure that coaches, parents and other adults who come in contact with children are good role models of behaviour;
- promote high ethical standards.

5.2. The key principles underpinning this policy are that:

- the child’s welfare is, and must always be, the paramount consideration;
- all children have a right to be protected from abuse regardless of their age, gender, disability, culture, language, racial origin, religious beliefs or sexual identity; and
- all allegations of abuse or poor practice will be taken seriously and responded to swiftly and appropriately.

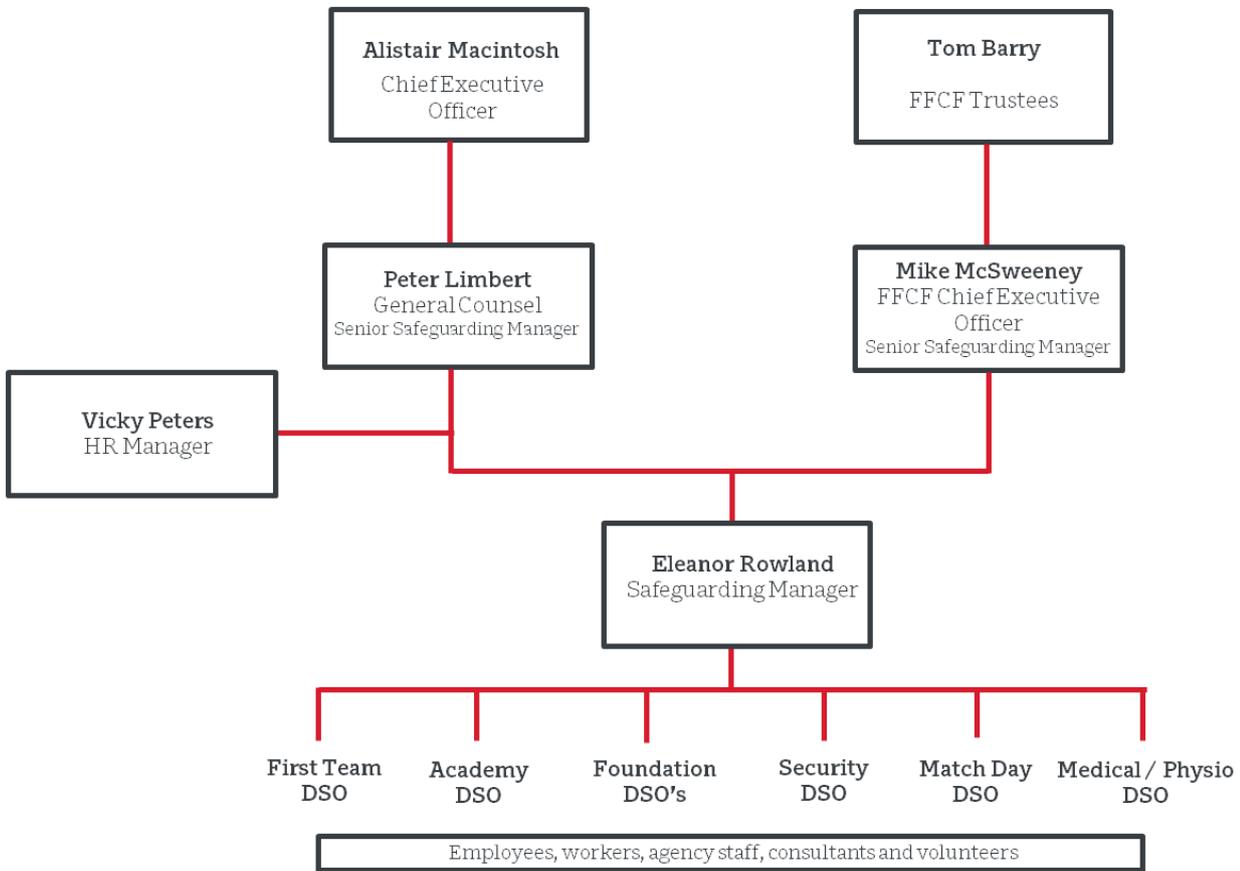
- 5.3. This policy applies to all staff at the Club and FFCF and is consistent with the Premier League 2019-18 Safeguarding Standards, NSPCC Standards, London Safeguarding Children Board; Child Protection Procedures, 2018.

6. Roles & responsibilities

- 6.1. The Club and FFCF has a comprehensive safeguarding structure which ensures the safety and welfare of all children that engage with their services. For the purpose of this policy the safeguarding structure consists of; the Safeguarding Senior Manager (SSM) who takes leadership responsibility for the Club’s safeguarding arrangements, the Safeguarding Manager (SM) who has overall responsibility for the day to day safeguarding of children at the Club and FFCF and departmental Designated Safeguarding Officers (DSOs) who work within various areas of the business. These DSOs have specific departmental responsibilities and are the focal point for safeguarding children in their area.
- 6.2. All job descriptions where the individual will be working with children and young people will reference the individual’s role and responsibility to safeguarding. The SSM, SM and DSO’s also have a clear reference within their job descriptions of their roles and responsibilities within Safeguarding.
- 6.3. Peter Limbert, who is a member of the management board, has been appointed by the Club’s Chief Executive to act on behalf of the board as the Senior Safeguarding Manager for the Club. Mike McSweeney, FFCF Chief Executive Officer has been appointed to act on behalf of the FFCF board of Trustees as FFCF’s Senior Safeguarding Manager.

³ Disclosure and Barring Service

6.4. Eleanor Rowland as Safeguarding Manager, is responsible for the overall implementation of the safeguarding, case management and safer recruitment across the Club and FFCF.



6.5. **Club Chief Executive Officer** – responsible for all aspects of the Club and to ensure safeguarding is a key priority at Board Level.

6.6. **General Counsel** – the Clubs identified Safeguarding Senior Manager (SSM) and takes leadership responsibility for the Club’s Safeguarding arrangements. It is the SSM and SM’s role to make it clear that safeguarding is everyone’s responsibility and should ensure they discharge their duties where there are concerns by making a referral to the appropriate authorities.

6.7. **Foundation Chief Executive Officer** – FFCF’s identified Safeguarding Senior Manager (SSM) responsible for all aspects of the Foundations work and to ensure safeguarding is a key priority across the Foundation and at Board Level.

6.8. **Human Resources Manager** – responsible for assisting the Club and FFCF to deliver the safeguarding strategy, priorities, policies and the safer recruitment procedure.

6.9. **Safeguarding Manager** – responsible for the strategic and operational direction of all safeguarding activities and for embedding safeguarding across the Club and FFCF. The SM is also the first point of contact should safeguarding concerns arise. The SM is responsible for ensuring all vetting checks adhere to the Club’s Recruitment Policy as well as legislation and governing body rules.

- 6.10. The SM will undertake regular monitoring and risk assessments of all activities involving children (or will designate this task to a DSO, the Health & Safety Manager or an external assessor where appropriate) as well as holding formal 'recorded' meetings on a six weekly basis.
- 6.11. DSOs are appointed to provide a lead for safeguarding within their departments at the Club and FFCF as well as being the point of contact should a concern arise within their own departments.
- 6.12. DSO's will meet on a 6 weekly basis to review incidents and share key information in accordance with 'Working Together to Safeguard Children 2017'. The minutes of such meetings will be recorded and stored appropriately and in line with the Data Protection Act (1998) and should be shared with the SSM.
- 6.13. Employees, workers, agency staff, consultants and volunteers are responsible for familiarising themselves with the Club and FFCF's policy and procedures, ensuring the safety and welfare of all children and young people as well as promoting best practice and creating a safe and inclusive environment to prevent harm occurring through awareness of what constitutes abuse and neglect.
- 6.14. Anybody with a concern about a child's welfare should contact the SM or a DSO for advice in the first instance – details can be found at the end of this policy.

7. Human Resources & Safer Recruitment

- 7.1. As part of the Club and FFCF's recruitment and selection process, offers of work for positions which involve working with children are subject to a satisfactory Disclosure & Barring Service (DBS) at the level deemed suitable for the position offered and subject to appropriate references.
- 7.2. The Club and FFCF require two satisfactory references and a DBS check to be completed before the commencement of employment. Only in exceptional circumstances where it is deemed business critical, can a risk assessment be completed for an individual to allow them to start work before these checks are completed. In these circumstances there will be no contact with children or vulnerable adults.
- 7.3. The SM holds a specific 'Safer Working Practice' induction with all new employee's, casuals and volunteers within their first month of work. During this induction key elements of the Club and FFCF's Safeguarding Children Policy are discussed in more detail, including any specific safeguarding updates, signs and indicators of abuse and how to report a concern.
- 7.4. All staff working in direct contact with children are required to complete the FA's 3 hour Safeguarding Children Awareness workshop before undertaking a role that requires working with children. Individuals must also undertake a refresher course, as advised by the FA and League, at least once every 3 years. Details of those satisfactorily completing this course are retained by the Human Resources Department in the Single Central Record.
- 7.5. Young people who are employed are subject to certain employment conditions and hours. Under Health and Safety Management Regulations, under 18's should always be under the supervision of a more experienced adult member of staff and should only undertake duties within their age and capability.

Single Central Record

- 7.6. The Safeguarding Manager maintains the Single Central Record which includes all staff, casuals, volunteers and work experience students who are working with children and vulnerable adults.

Work Experience

- 7.7. The Club and FFCF may from time to time offer work experience placements to young people. The Club and FFCF has a central work experience scheme which provides forwardly planned and structured work experience placements. Whilst undertaking work for the Club or FFCF, those on work experience will not have unsupervised access to children.
- 7.8. The HR Manager and the Safeguarding Manager should be informed of work experience placements for all children of compulsory school age and young people.
- 7.9. The Club and FFCF has procedures to safeguard children undertaking work experience which are in accordance with “Work Experience: a guide for Employers”⁴
- 7.10. A risk assessment must be completed by the Health and Safety Officer for each child and young person. This must be shared with the parent or carer before the placement is agreed.

Volunteers

- 7.11. Volunteers will undergo checks commensurate with their activities at the Club and FFCF. Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised with children.
- 7.12. Volunteers who work only in a supervised capacity and are not in regulated activity will undergo the safe recruitment checks appropriate to their role, including a DBS check at Enhanced level but without a barred list check.
- 7.13. All volunteers who are working with children will also be required to attend a Safer Working Practice induction and will also be required to complete the FA Safeguarding Children course.

Contractors

- 7.14. All external contractors engaged by the Club or FFCF 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 the Club or FFCF the contractor will receive a site induction from a member of the Facilities team which covers Safeguarding Children and given details of the expected code of behaviour.
- 7.15. Contractors are subject to regular inspection from the Club or FFCF 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 or with the Club or FFCF personnel overseeing the work.
- 7.16. The contractor will be required to avoid contact with children at all times.

Third Party Organisations and Partnerships

- 7.17. The Club and FFCF’s commitment to safeguarding should be outlined in any partnership agreements, service level agreements or any other agreements that are in place with any service provider or for commissioned services.
- 7.18. If other organisations provide services or activities for children for whom the Club or FFCF is responsible, the Safeguarding Manager will check that the organisation has appropriate procedures in place, including safer recruitment procedures.

⁴ DFES, 2002

- 7.19. The Club or FFCF will obtain written confirmation from supply agencies or third party organisations that agency staff or other individuals who may work at the Club or FFCF with children have been through appropriate safer recruitment procedures.

8. Disclosure & Barring Service

- 8.1. The Club and FFCF is registered with The Media Group (GBG) and the Disclosure Barring Service to carry out Criminal Record Checks. Enhanced DBS checks, plus barred list checks where appropriate, enable the Club and FFCF to undertake more thorough recruitment and selection procedures for positions which involve working with children.
- 8.2. The Club and FFCF do not currently accept the DBS update service.

New Appointments

- 8.3. All staff who are offered a position which involves working with children will be required to complete a Self-Declaration Form and also undertake an Enhanced DBS with barred list check where appropriate. Other roles which are also suitable for a DBS check but not enhanced are identified within the League's 'Roles in Football' guidance. 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 DBS has been received, the member of staff will not be permitted to work unsupervised with children.
- 8.4. If a new member of staff has been subject to a DBS check by their previous employer the Club and FFCF will still require a further check.
- 8.5. If a member of staff is transferring internally to another role which also requires a DBS. An assessment will be made regarding the level of DBS check (Basic, Enhanced or Enhanced with Barring) and for which workforce (Child or Adult) and a decision will then be made if a new DBS is required.
- 8.6. The Club and FFCF will ensure that all temporary staff and external consultants identified in roles that are working with children, sign a Self-Declaration Form and in any case, will not have unsupervised access to children during their time with the Club and FFCF.

Positive Disclosure

- 8.7. Should a DBS with content be received, a risk assessment will be carried out by either the Safeguarding Manager, relevant Head of Department, HR Manager and where applicable the Club or FFCF Senior Safeguarding Manager, to assess the information contained within the DBS. The member of staff will also be asked to attend an interview prior to a recruitment decision being made. The Rehabilitation of Ex-Offenders Act 1974 and the Protection of Freedoms Act 2012 should be considered in all cases before a final decision is made.
- 8.8. The Club and FFCF is committed to providing equal opportunities to staff and therefore a DBS which has content, will not necessarily result in a bar from work.

9. Ratios & Supervision of Children

- 9.1. Any activity undertaken by the Club and FFCF 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 other additional needs of the group. The general rule is that the lower the age of the participants, the greater the need for supervision.
- 9.2. Coaching and staffing arrangements must always meet the needs of all children and ensure their safety. The Club and FFCF staff must ensure that children and young people are adequately supervised and decide how to deploy staff to ensure their needs are met.

- 9.3. To deliver, Coaches are required to have an Enhanced DBS with Barring Check, an in date and relevant Emergency Aid Certificate and they must have an in date FA Safeguarding Certificate.
- 9.4. A minimum of 2 members of staff, with appropriate DBS checks, will always be available to supervise any activity, event or trip. This ensures at least basic cover in the event of something impacting on the availability of one of the adults during the activity.
- 9.5. Where the Club or FFCF is taking responsibility for the care of the children, parents/carers should not be included in supervision calculations.

Foundation Ratios

- 9.6. FFCF adhere to the Football Association's (FA) recommendations that 'as a rule of thumb teams should generally have a minimum of 1 adult to 16 children and young people and a minimum of 2 adults'.⁵ For children who are 5 years old or under this ratio reduces to 1 adult to 12 children.
- 9.7. There is an exception to the above rule in that, in an education setting (excluding extracurricular activities) FFCF should have a Service Level Agreement, which states that FFCF will provide one coaching member of staff for up to 30 children⁶ alongside another member of school staff. Where numbers exceed 30, FFCF will be required to provide another coach at the agreed rate within the SLA.
- 9.8. Where FFCF are providing programmes, activities or events, the FFCF Fit for Purpose Policy should be referenced to ascertain appropriate and safe ratios. This includes Match Day Half Time Activities.

Academy Ratios

- 9.9. The Premier League Youth Development Rules prescribe that for an Academy with Category 1 Status using the full time training model, 'a ratio of 1 Coach to 8 Players' is maintained for all coaching sessions⁷. However, there may be times during trips and visits for instance, when ratios may alter. These will always remain within statutory guidelines for education and risk assessments completed.

Children at Match Day Events

- 9.10. During Match Day there are often groups of children who are visiting the stadium with parents or other professionals in organised groups. If the Club or FFCF are providing an event such as a tour of the stadium, the Club or FFCF are not primarily responsible for these children. The Club and FFCF will however always have a minimum of 2 responsible adults to every group of 20 children.
- 9.11. For organised groups where other professionals or parents are not in attendance, the Club or FFCF are primarily responsible for the children in attendance for any activity. The minimum ratio for children over 5 years of age is 2 adults (who have valid DBS checks) for every 16 children. This is reduced to 12 for children under 5 years of age. The Club and FFCF will take full responsibility for these children whilst in our care and will follow standard protocols such as completing risk assessments, registration and dispersal.
- 9.12. All children who attend Craven Cottage for an activity or event including Mascot's and Ball Boys/Girls must be accounted for on a register. Parental consent must be documented prior to any event, which agrees to their participation, photography and how their child will be collected at the end of their experience.

⁵ grassroots-football-safeguarding-children-policy-and-procedures

⁶ Department of Education, <https://www.education-ni.gov.uk/articles/pupils-and-classes> 2017-18

⁷ Youth Development Rules of the EFL, Section 8 – 430, Measure 119

9.13. All parents / carers are required to sign the register on collection of their children.

10. Coaching Staff

- 10.1. All coaching staff who work with children are required to undertake appropriate safeguarding training for their role in accordance with guidance as issued by the FA, the Premier League and internal Club and FFCF Safeguarding workshops delivered by the Safeguarding Manager. This includes attending the FA Safeguarding workshop and a relevant First Aid course every 3 years.⁸
- 10.2. Coaching staff are responsible for renewing their DBS every 3 years. Where a certificate expires but the individual has applied within the recommended timeframe (3 months), the individual will be taken off regulatory activity and will be provided with alternative non-regulatory duties, at the HR and Safeguarding Manager's discretion. Casual coaches will not be offered work until they are able to provide evidence of a valid DBS.
- 10.3. The Club and FFCF has a code of conduct for all employees and 'Ethics in Business Policy' which all coaching staff are made aware of at induction and are accountable to during their tenure with the Club and FFCF.
- 10.4. The Club and FFCF considers coaching staff to be in a position of trust and authority. Therefore it is strictly forbidden for coaches and any other employee to engage in a personal or sexual relationship with any player or participant under the age of 18.

11. Scouts

- 11.1. All Scouts undertaking work for the Club are registered with the Football League. Those scouts who are engaged in identifying players under the age of 18 also undergo a DBS and are required to undertake the FA Safeguarding Children Workshop.
- 11.2. All Scouts undertaking work for the Club are required to receive and read the Safeguarding Children Policy and will be held accountable to this when working with anyone under the age of 18.
- 11.3. Two written references are sought for all Scouts and on registration Scouts identifying players under the age of 18 are issued with a copy of the League's Youth Development Rules and Regulations, the Club's Code of Conduct and the Safeguarding Children Policy.
- 11.4. The Club only permits Scouts from other Clubs to attend its Academy Games Programme matches in accordance with the provisions of the Premier League Youth Development Rules. For instance any Scout who attends an Academy match from another club must:
 - notify both Clubs involved in the match of the Scout's proposed attendance by no later than 12 noon on the last Working Day before the published date of the match;
 - the Scout is able to produce on demand to the home Club the identification card issued to him by his Club in accordance with the Premier League Rules; and
 - inform the home Club of his arrival at a match.
- 11.5. A Scout shall conduct himself at all times in an ethical and professional manner and shall observe the highest standards of integrity and fair dealing.⁹
- 11.6. FFC shall prepare and produce a document setting out the process of how Scouts employed by that Club should approach Academy Players (and other players) and the process thereafter.

⁸ Youth Development Rules of the EFL, Section 8 – 474, Measure 6.5

⁹ Youth Development Rules, Section 08-476, Measure 8

Such process should comply in full with the Premier League Rules, these Rules and the Code of Conduct for Scouts.

12. Gifts and Favouritism

- 12.1. 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.
- 12.2. The Club and FFCF recognise 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 and they should be dealt with in accordance with the Club’s Ethics in Business Policy.
- 12.3. 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.
- 12.4. Any reward given to a child must first be agreed with the staff member’s line manager as part of a structured reward system in line with the departmental policy and not based on favouritism.
- 12.5. It should be noted that these guidelines are in addition to employees’ obligations under the Clubs’ Ethics in Business Policy.

13. Use of Images

- 13.1. The vast majority of people who take or view photographs or videos of children do so for entirely innocent and legitimate reasons. However, sadly, some people abuse children through taking or distributing images. We must therefore ensure we have effective safeguards in place.
- 13.2. Where children are being photographed the following will apply in order to protect children:
- 13.3. All children featured in Club or FFCF publications will be appropriately dressed and will have clothing garments covering their torso and from at least the bottom of their neck to their thighs, and feature safety equipment such as shin pads or guards.
- 13.4. Designated Club and/or FFCF photographers will, where applicable, undertake a DBS 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’ policy issued by the Club and by the Football League from time to time. Club or FFCF Identification will be worn at all times.
- 13.5. All external photographers are subject to contractor requirements and will be escorted at all times whilst on the premises.
- 13.6. Recordings of children for the purposes of legitimate coaching aids are only filmed by Club or FFCF officials and are stored safely and securely at the Club’s premises.
- 13.7. Any instances of inappropriate images in football should be reported to the Safeguarding Manager immediately.
- 13.8. Photography is forbidden in private areas such as changing rooms, toilets, showers, changing rooms whilst a child is in a state of undress.

13.9. The Club and FFCF does not put young player profiles with images and personal information on its website.

Players and Participants

- 13.10. Before taking or publishing images of children (for example on our website or on a newsletter) parental consent is sought in writing at the start of each football season or prior to the event. Parents/Legal Guardians are responsible for informing the Club of any change of circumstances within the season which may affect consent.
- 13.11. Parents/Legal Guardians will be informed of how the image will be used. The Club and FFCF will not allow an image to be used for something other than that for which it was initially agreed.
- 13.12. Children attend games as spectators. Images of children may appear as part of the crowd on match days and be reproduced in official Club and FFCF promotional material and appear in the public domain. The Clubs terms and conditions of ticket purchase and standard ground regulations state that that images can be taken of fans within the crowd and used in promotional material. Ticket holders agree to these conditions when purchasing a ticket. Any queries on promotional material featuring a child should be addressed to the Clubs customer care team or Safeguarding Manager.
- 13.13. Only the first name of any child will be used on any publication if consent has been given.
- 13.14. The Club and FFCF will encourage children to tell us if they are worried about any photographs that have been taken of them.
- 13.15. Where possible, the image will focus on the activity taking place and not a specific child.
- 13.16. Where appropriate, images represent the broad range of people participating safely in the event.
- 13.17. No images of children featured in Club publications will be accompanied by personal details such as their school or home address.

14. Travel, Events & Support Liaison

- 14.1. All off site (outreach) activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. Where these activities are provided by and managed by the Club of FFCF our own safeguarding and child protection procedures apply.
- 14.2. Children have a right to enjoy taking part in sports events planned and provided by those who put their safety and wellbeing first. The Club and FFCF as event organisers, have a responsibility to take all reasonable steps to ensure that the activities provide as safe an environment as possible.
- 14.3. When children for whom the Club and FFCF are responsible attend off-site activities, including residential visits and work related activities, the DSO or Safeguarding Manager will check that effective risk assessments and safeguarding arrangements are in place such as effective supervision, registration and dispersal. These will be monitored and audited on an annual basis and the results of which will be reported back to the Management Board of the Club and Board of Trustees at the Foundation.

International and National Tours

14.4. All tour's where children and young people are in attendance are managed in line with the Premier Leagues guidance. Every tour will have a designated co-ordinator and they will take responsibility for the tour pack, which will include information on:

- Travel Arrangements
- Any medical conditions including allergies
- Dietary requirements
- School consent
- Parental consent
- Emergency contact details
- Emergency procedures
- Event risk assessment

14.5. The Club and FFCF follow both the Child Protection in Sport Unit's¹⁰ and the FA's recommended guidance for ensuring the safety and welfare of children whilst travelling¹¹.

15. Lost Children

15.1. A lost child should be treated as a very serious incident and the Incident Reporting Policy and escalation process should be followed.

15.2. During delivery of programmes or other events it is the coaches' responsibility to do regular and thorough head counts. At any one time a coach should know how many children are within their responsibility.

15.3. A lost child is considered as a very serious incident and therefore a full review will take place within 1 week of the incident occurring. A decision will be made regarding any potential conduct or disciplinary action.

15.4. All sites where the Club or FFCF deliver from will have a risk assessment that will include any additional measures taken to ensure a child does not go missing whilst in our care.

15.5. In any incident where a child is unaccounted for during or after a session the incident reporting and escalation process should be followed.

Stadium

15.6. It is rare for a child to become separated from the adult that they have attended with. Stadium staff are trained to deal with such instances and have a clear protocol to follow. Stewards are instructed to stay with the Child (in pairs) for 15 minutes and wait for the parents, after that they escort the child to security and an announcement would be made within the stadium.

16. Match Day

Unaccompanied Children

16.1. A child must be 12 years old or over to be able to attend a match unaccompanied. An under 12 child cannot attend on their own. This is congruent with the NSPCC guidelines which states that children under the age of 12 are rarely mature enough to cope in an emergency.

16.2. Anyone under the age of 12 must have a responsible person aged 16 or over with them.

¹⁰ CPSU Guidance 'Safe sports events, activities and competitions

¹¹ The FA, Travel Trips and Tournaments recommended guidelines

- 16.3. Multiple junior tickets can be sold, if all of the group are 12 years and over. Parental permission will need to be given for each junior ticket.

Mascots & Ball Persons

- 16.4. The Club will only allow children to be match day mascots or ball persons once parental consent has been obtained. A signed image consent form is also required before any images are published in the Club's match day programme.
- 16.5. No photographs of mascots or ball persons featured in Club or FFCF publications will be accompanied by personal information about the child, such as their school, home address or local sports team.
- 16.6. Whilst at Craven Cottage, mascots and ball persons are accompanied at all times by at least 2 members of staff who have a valid DBS. Staff who are responsible for mascots and ball persons on a match day are also required to have a good level of understanding and awareness of safeguarding children.

Searching of Minors and use of Search Dogs

- 16.7. All children and young people may be subject to the Club's search process. Children and young people should be encouraged to self-search as to reduce the need for physical contact; however should the club suspect that the child or young person may be concealing a prohibited item, consent will be sought from their parent/carer before a Steward or Security member of the same sex who is being observed by a Supervisor searches the child.¹²

17. Academy Department

- 17.1. The Academy is committed to the welfare and safety of all children and understands the importance of communication and working closely with parents, carers, host families, schools and local authorities to ensure that the wellbeing of all children is paramount.

Academy Registration

- 17.2. On arrival players must register at reception prior to entering the site by signing the Academy register that can be found on the security desk.
- 17.3. Once onsite, and following arrival at the players first scheduled session/activity FFC, staff will also register the player into the session/activity.

Absence

- 17.4. Parents are required to notify a relevant member of Academy staff a minimum of **one hour** prior to the players expected arrival time at Motspur Park if the player is unable to attend.
- 17.5. If a player has failed to arrive within **one hour** of the expected session/activity start time, and no explanation for non-attendance has been received from the parents or carer, the Academy will notify the parent/carer to inform/determine the reason for the player's non-attendance.

Head Count

- 17.6. During delivery of a session/activity it is the lead staff member's responsibility to do regular and thorough head counts. At any one time the lead staff member should know how many children are within their responsibility.
- 17.7. Where a child temporarily leaves a session i.e. to get water or got to the toilet, the lead staff member is expected to complete a head count on their return.

¹² British Security Industry Association

Dispersal

- 17.8. It is the parent/carer's responsibility to ensure that their child is dropped off and collected by a responsible person if it is not safe for the child to walk home unsupervised.
- 17.9. Unless written permission has been given for child to walk home alone or to be picked up by another individual, coaches should not discharge from their responsibility.
- 17.10. Whether a child has participated in a training session, fixture or is arriving back from a trip or tour, when collected parents must use the designated waiting area outside reception and not congregate inside the reception area to ensure safe access to all fire exits.
- 17.11. Staff have a responsibility to ensure they have signed all children out appropriately. For Academy activities the following applies:
- Only players who have been given prior written permission to walk home alone may do so. These players must still sign out on the register.
 - Any player being collected by their parent/carer that does not have permission to walk home alone must be signed out by parent/carer before they leave.

Transport

- 17.12. The Academy Player Care Manager and Transport Manager are responsible for overseeing transport arrangements across the Academy, including registered Academy players and players attending the Club on trial. Both the Academy Player Care Manager and Transport Manager attend six weekly DSO meetings in order to report on the Academy's transport programme and other relevant matters.
- 17.13. When children are being transported on behalf of the Club they shall, where possible, be accompanied by their team manager, a coach or a designated tour leader. In some cases, where children need to be transported unaccompanied, this will be with an approved travel company (who have signed up to the Club's "Driving at Work Policy"), or by a member of Club staff who has a satisfactory DBS and has been issued with (and received training on) the Club's Academy Transport Policy. In either case a child will only be transported under these circumstances with the specific prior consent of their parent or guardian. Although outside of the sphere of responsibility for local education authorities, the Club also provides a duty of care for young person's when travelling on behalf of the Club.

Medical

- 17.14. There will be occasions where medical treatment is necessary during evening training sessions and weekend fixtures. The Club is committed to ensuring that there will always be two medical staff of an evening and weekend.
- 17.15. The Club is committed to ensuring that there is appropriate first aid or primary care provision for all training and games. Therefore the Club will guarantee that a Doctor or Physiotherapist is present at each training session or game.
- 17.16. Any Doctor employed by the Club will hold a current FA Advanced Resuscitation and Emergency Aid certificate or an equivalent or higher qualification approved by the Board or Paramedic.
- 17.17. Every Physiotherapist is required to hold an FA Level 4 Intermediate Trauma Medical Management in Football qualification or an equivalent or higher qualification approved by the Board.
- 17.18. A Doctor or Physiotherapist will be available at each venue used by the Club during training.

- 17.19. The Club is committed to ensuring that a defibrillator is maintained at each venue where matches are played and at which coaching takes place and that at all times a member of staff qualified in its use is present during matches and coaching.
- 17.20. All members of the medical department have a valid DBS and are required to attend the FA's Safeguarding Children awareness workshop and internal Safer Working Practice training. The Club is fully committed to equal opportunities for all individuals and, as such, the Club employs both male and female staff to work within the medical department.
- 17.21. Each coach must have an appropriate Basic First Aid qualification and they are required to renew this when appropriate.
- 17.22. The Club is more than happy for parents and carers to attend pre booked medical treatments if required. If, due to the first team's schedule, this is not possible an alternative appointment may need to be arranged.
- 17.23. In circumstances where injuries are located in sensitive areas, please refer to the Club's policy on "Treatment of Sensitive Areas".
- 17.24. The Medical department has a separate Code of Conduct for use when dealing with children and young people that is issued to all part time and full time staff members.
- 17.25. A record will be maintained which details all injuries suffered by any Academy Players.
- 17.26. Each young person who is registered with the Academy on the Full Time Training Model will be registered with an NHS general practitioner for the provision of general medical services.

Accommodation

- 17.27. If required to stay overnight on any Club event, children will be accompanied in the accommodation by at least **two** nominated staff members who have a valid DBS and will have undertaken the FA Safeguarding Children training. The responsible adults will stay in a room ideally on the same corridor as the children for maximum supervision. Should a parent prefer to accompany and stay overnight with their child then a request can be made to the Academy for consideration. In any event, written parental / guardian consent will be sought before a child or young person stays overnight in accommodation.
- 17.28. All players will stay in a room either on their own or with another same age player.
- 17.29. All accommodation venues will be risk assessed by an appropriate member of staff in advance of any event.

Host Families

- 17.30. Prior to the commencement of an agreement between the Club and a host family an Enhanced DBS plus barred list check is carried out on the designated house parent along with an enhanced check on any other person residing at the house who is over 16 years of age.
- 17.31. References from previous employers and local authorities (where applicable) are also sought. House visits are conducted on a bi-annual basis by both the Academy Head of Player Care and the Safeguarding Manager.
- 17.32. A full Health & Safety risk assessment is conducted by the Club's Health and Safety Manager and an external consultant and a guidance manual is distributed to all families.
- 17.33. A Host Family Induction Evening is held at the Club on an annual basis which includes a Safeguarding Children briefing, and the Academy Head of Player Care and Safeguarding

Manager maintains constant dialogue with all Host Families throughout the season, including invitations to relevant and appropriate training and workshops.

Private Fostering

- 17.34. In the event that the Club choose to place an U16 within a Host Family environment, Private Fostering regulations will be followed and appropriate dialogue would take place with the relevant local authority to ensure that all statutory requirements are met.

Youth Loans, Trials & Work Experience

- 17.35. 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 consent (additional 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 the Club will insist that, where possible, players are placed in host family accommodation during their time away from the Academy and not in hotel accommodation, and as good practice the Academy will designate a member of 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. Please also see Academy Loan Player document.
- 17.36. For players under the age of 18 who are joining the Club on trial (including Work Experience) parental consent will be sought prior to the trial taking place, along with a full medical history and injury disclaimer. Where accommodation is required during the trial period, this will be in designated host family accommodation or, 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 via the Academy Player Care Manager or his designate.

U18, 23 and First Team Progression

- 17.37. As players progress through the Academy system they may have the opportunity to train and play with the adult provisions of the Club. The Club will support the player(s) during this transition and the preparation starts in Youth Development Phase through to the professional Development Phase through to the Professional Development Phase with extra activities to develop life skills and independence in the education programme, along with strong support from Academy staff this helps to build resilience.
- 17.38. First Team progression carries a number of safeguarding concerns as the player(s) 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 involved at all stages and consent sought.
- 17.39. Each player who transitions to adult provisions who is under the age of 18 will be formally introduced to their First Team 'buddy' through a multi-disciplinary meeting which will always include the Safeguarding Manager, Academy Head of Player Care and the First Team Head of Player Care. During this meeting the player will be given an opportunity to share any concerns or worries they may have and advised as to what to do should he have any concerns going forward. A formal risk assessment will take place which will document the safeguarding arrangements made regarding travel, accommodation, changing facilities and any education provision.
- 17.40. Any player(s) who are under the age of 18 are strictly forbidden from sharing rooms with adult players. Parents will be informed that they are to be in a room alone, unless there are two under 18 players travelling together.

- 17.41. Staff working with Development and within the First Team provision are DBS checked, attend FA Safeguarding Training, attend the Clubs Safer Working Practice Workshop and follow a Code of Conduct for youth players in an adult provision.
- 17.42. The Club's "Guidance for accommodating U18's within the first team" has been compiled to cover all aspects of a player(s) journey and should be referenced for further clarity.

18. Community Activity – "The Fulham FC Foundation"

The FA Charter Standard

- 18.1. Although FFCF ensures full compliance with the FA Charter Standard, it endeavours to adhere to the rules and guidelines issued by the Football League with regard to safeguarding Children.

Fit for Purpose

- 18.2. All FFCF activities are governed by a Fit for Purpose Policy which covers the following:
- DBS detail
 - Coaching qualifications
 - Adult : Child Ratios
 - Risk Assessment
 - Service Level Agreements & Partnership Agreements
 - Registration & Dispersal Procedures
 - Accident / Incident Report Forms
 - Coach Guidelines & Code of Conduct
 - Late Collection Procedures
 - First Aid / Administration of Medication
 - Transporting Children
- 18.3. This Policy is written in consultation with the FFCF Chief Executive Officer, FFCF Designated Safeguarding Officers and the Safeguarding Manager and is under constant review.

Parental Consent

- 18.4. The FFCF will obtain parental consent for all activities using a Parental Consent Form. The FFCF will do everything it can to safeguard children and young people in its care but recognise that in some circumstances, due to the nature of the work carried out, obtaining parental consent for specific activities is not always possible.

Disclosure and Barring Service

- 18.5. In accordance with the procedures detailed above, all FFCF staff and casual coaches will complete an Enhanced DBS check with barred list every 3 years. For more detailed information on Safer Recruitment refer to the FFC Safer Recruitment Policy.

Re-certification

- 18.6. It is an expectation of all staff who work with children and young people to keep their certificates up to date. All certificates including DBS, FA Safeguarding and First Aid expire after three years.
- 18.7. All FFCF staff are required to re-apply for their DBS no later than 3 months before expiry.
- 18.8. All FFCF staff and casual coaches are responsible for ensuring they attend an FA recognised First Aid and FA Safeguarding Course at least 1 month before the expiration of their previous certificate.

FFP Certificate Expiration

- 18.9. Where a certificate expires but the individual has applied within the recommended timeframe, the individual will be taken off regulatory activity and will be provided with

alternative non-regulatory duties, at the Head of Operations discretion. Casual coaches will not be offered work until they are able to provide evidence of re-certification.

- 18.10. If an employee has not applied for recertification within the recommended timeframe, and becomes unfit for purpose, at the Head of Operations discretion, the individual may be suspended without pay until re-certification is complete and evidence is provided.

Sessional Workers

- 18.11. All sessional workers (casual coaches) are expected to attend regular Safeguarding updates delivered by the Safeguarding Manager. Work will not be offered if the sessional worker cannot attend.
- 18.12. If a sessional worker has not worked for FFCF for 6 months they will be made inactive on the Single Central Record. In order to re-start work and if their DBS is still within its three year term, the individual will be required to submit a self-declaration form and attend a Safer Working Practice induction, delivered by the Safeguarding Manager.
- 18.13. If any of the above certificates have expired these will be required to be renewed before work can be offered.

Departmental Risk Assessments

- 18.14. The FFCF undertakes a Risk Assessment for each Activity they operate on a bi-annual basis and these are completed in consultation with the FFCF Department Manager and, where necessary, the Safeguarding Manager and Health and Safety Manager.
- 18.15. All children and young people are encouraged to wear appropriate shoes and protective equipment as appropriate to the sports activity. Coaches are required to adapt the sessions should there be participants who are unable to wear the appropriate protective equipment.

Activities for Disabled Persons & Adults at Risk

- 18.16. The FFCF carries out all activities for disabled persons and adults at risk under the guidelines of the Equality Act 2010 and Safeguarding Vulnerable Groups Act 2006, and in accordance with the Club's Disability Policy and Safeguarding Adults at Risk Policy.

HMP Activities and Programmes

- 18.17. Where individuals are required to work within Her Majesty's Prisons (HMP) appropriate DBS and additional police vetting checks will be required.
- 18.18. Additional safety training will be provided by the local establishment and governance protocols will be outlined within a Service Level Agreements. For instance, safeguarding referral pathways will be in line with the establishment's protocols.

Employability and other participant programmes

- 18.19. FFCF reserve the right to gather further information on participants of any programme who is over the age of 16 should they have any additional concerns about their potential risk to staff, themselves or other participants. Deployment to programmes is therefore at the discretion of the Safeguarding Manager and Head of Operations, based on satisfactory reference checks and DBS.

Code of Conduct

- 18.20. Each session delivered by FFCF applies a code of conduct which defines the behaviour expectations of both participants and staff. For more detail please refer to the Fit for Purpose Policy.

19. Guidelines in the event of concern

Highlighting Concern

- 19.1. Although the Club 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.
- 19.2. If you work or intend to work with young people, you are automatically placed in a position of trust that carries authority, status, power and responsibility. If the adults involved are positive role models displaying high moral and ethical standards, the benefit to young people's development can be significant. Unfortunately, it is also possible for adults in football to do a lot of harm by bullying, harassing, neglecting or abusing children and young people; or by failing to respond to concerns they may have.
- 19.3. It is likely that if you have a concern this will be about poor practice rather than abuse. Both occur in football and both require a response. Please refer to section 19 for more information on how to respond to a concern or suspicion.
- 19.4. Child abuse is any action by another person – adult or child – that causes significant harm to a child. It can be physical, sexual or emotional, but can just as often be about a lack of love, care and attention. We know that neglect, whatever form it takes, can be just as damaging to a child as physical abuse.
- 19.5. "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.

Recognising signs of abuse

- 19.6. There are many different forms of abuse that fall into the categories identified by the NSPCC as follows, should you have any concern that abuse is occurring you should contact the SM or a Designated Safeguarding Officer immediately.

Physical Abuse

- 19.7. Physical abuse is deliberately hurting a child causing injuries such as bruises, broken bones, burns or cuts.
- 19.8. It isn't accidental - children who are physically abused suffer violence such as being hit, kicked, poisoned, burned, and slapped or having objects thrown at them. Shaking or hitting babies can cause non-accidental head injuries (NAHI). Sometimes parents or carers will make up or cause the symptoms of illness in their child, perhaps giving them medicine they don't need and making the child unwell – this is known as fabricated or induced illness (FII).
- 19.9. There is no excuse for physically abusing a child. It causes serious, and often long-lasting, harm – and in severe cases, death.

Honour Based Violence

- 19.10. A child who is at risk of honour based violence is at significant risk of physical harm (including being murdered) and/or neglect, and may also suffer significant emotional harm through the threat of violence or witnessing violence directed towards a sibling or other family member.

- 19.11. Honour based violence cuts across all cultures and communities, and cases encountered in the UK have involved families from Turkish, Kurdish, Afghani, South Asian, African, Middle Eastern, South and Eastern European communities. This is not an exhaustive list.

Sexual Abuse

- 19.12. 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.

Harmful Sexual Behaviour

- 19.13. Children and young people who develop harmful sexual behaviour harm themselves and others. Harmful sexual behaviour includes; using sexually explicit words and phrases; inappropriate touching; using sexual violence or threats; full penetrative sex with other children or adults.

Child Sexual Exploitation

- 19.14. Child sexual exploitation (CSE) is a type of sexual abuse. 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.
- 19.15. Children or young people may be tricked into believing they're in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed and exploited online.
- 19.16. 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.¹³

Neglect

- 19.17. 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); 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

- 19.18. 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

¹³ www.nspcc.org.uk

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 including Peer on Peer

- 19.19. The Club 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 Safeguarding Manager. The Academy has a separate Anti-Bullying policy which is issued to parents, players and coaches.
- 19.20. Bullying is behaviour that hurts someone else – such as name calling, hitting, pushing, spreading rumours, threatening or undermining someone.
- 19.21. It can happen anywhere – at school, at home or online. It's usually repeated over a long period of time and can hurt a child both physically and emotionally.
- 19.22. Bullying that happens online, using social networks, games and mobile phones, is often called cyberbullying. A child can feel like there's no escape because it can happen wherever they are, at any time of day or night.
- 19.23. All staff members who undergo the FA's Safeguarding Children Workshop receive bullying awareness training as part of the workshop as well as attending a Safer Working Practice workshop facilitated by the Safeguarding Manager.
- 19.24. For more detailed information on the categories of abuse, reference should be made to the Football Association's Safeguarding Children Policy and Procedures, which can be found on www.thefa.com

Radicalisation & Extremism

- 19.25. The following definitions are taken from the HM Government Prevent Strategy 2011.

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

Extremism is 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. We also include in our definition of extremism calls for the death of members of the armed forces.

- 19.26. Section 26 of the Counter-Terrorism and Security Act 2015 (the Act) places a duty on certain bodies ("specified authorities" listed in Schedule 6 to the Act), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This guidance is issued under section 29 of the Act. The Act states that the authorities subject to the provisions must have regard to this guidance when carrying out the duty.
- 19.27. A range of private and voluntary agencies and organisations provide services or, in some cases, exercise functions in relation to children. The duty applies to those bodies, which include, for example, children's homes and independent fostering agencies and bodies exercising local authority functions whether under voluntary delegation arrangements or via the use of statutory intervention powers. These bodies should ensure they are part of their local authorities' safeguarding arrangements and that staff are aware of and know how to contribute to Prevent-related activity in their area where appropriate.¹⁴

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445977/3799_Revised_Prevent_Duty_Guidance_England_Wales_V2-Interactive.pdf

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf

19.28. The Club and FFCF recognise that some children and young people are more vulnerable to radicalisation, including those who may be isolated/marginalised in society (through mental health or disability) and may have no other support. Children who attend sports activities are not immune from this risk and therefore the Club and FFCF ensure that all staff who work with children and young people are equipped at identifying potential indicators of abuse in regards to radicalisation and extremism.

FGM Mandatory Reporting Duty

19.29. Female genital mutilation (FGM) is the partial or total removal of external female genitalia for non-medical reasons. It's also known as female circumcision or cutting. Religious, social or cultural reasons are sometimes given for FGM. However, FGM is child abuse. It's dangerous and a criminal offence.

19.30. Section 74 of the Serious Crime Act 2015 amended the Female Genital Mutilation Act 2003 to introduce the legal duty for regulated health and social care professionals and teachers to make a report to the police if:

- they are informed by a girl under the age of 18 that she has undergone an act of FGM; and/or
- they observe physical signs that an act of FGM may have been carried out on a girl under the age of 18.

19.31. The Club and FFCF ensure FGM is a mandatory topic discussed in the Safer Working Practice Induction and specific Equality and Diversity workshops for Staff, Participants and Scholars.

20. Reporting a disclosure or suspicion of abuse or poor practice

20.1. It can be very hard for children and young people to reveal abuse. Often they fear there may be consequences. Some delay telling someone about abuse for a long time, while others never tell anyone, even if they want to.

20.2. Children value being believed and, as the adult they have chosen to tell, it's vital that you act on what you've been told.

20.3. A Designated Safeguarding Officer or the Safeguarding Manager should be contacted as early as possible and within 24 hours in any circumstance, 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 or poor practice:

- Listen carefully to the child. Avoid expressing your own views on the matter. A reaction of shock or disbelief could cause the child to 'shut down', retract or stop talking
- Let them know they've done the right thing. Reassurance can make a big impact to the child who may have been keeping the abuse secret
- Tell them it's not their fault. Abuse is never the child's fault and they need to know this
- Say you believe them. A child could keep abuse secret in fear they won't be believed. They've told you because they want help and trust you'll be the person to believe them and help them
- Don't talk to the alleged abuser. Confronting the alleged abuser about what the child's told you could make the situation a lot worse for the child

- Explain what you'll do next. If age appropriate, explain to the child you'll need to report the abuse to someone who will be able to help
- Don't delay reporting the abuse. The sooner the abuse is reported after the child discloses the better. Report as soon as possible so details are fresh in your mind and action can be taken quickly.
- Write down everything said and what was done (handwritten is preferable) and sign and date the notes. An Incident Report Form should be used where possible and, in any case, a referral must be made to the Club within 24 hours of the incident taking place.
- Seek medical advice if necessary

20.4. Make sure you tell a Designated Safeguarding Officer immediately, they will know how to follow this up and where to go for further advice.

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

21. Recording Allegations or Suspicions of Abuse or Poor Practice

- 21.1. All staff should immediately report any observations, allegation or suspicions of abuse or poor practice by another professional to the Safeguarding Manager, who will ask for a written factual statement from the person making the report. An Incident Report Form should be provided to the Safeguarding Manager.
- 21.2. Any statement made by the child should be reported in their own words. These reports should be confined to facts. Any opinion, interpretation or judgement should be clearly stated as this, keeping any questions to a minimum and they should be of an open format. No suggestion of who the perpetrator was or how any concern or incident happened should be suggested.
- 21.3. Poor practice represents unsafe working practice and is a cause for concern and staff should feel able to raise concerns about poor or unsafe practice.
- 21.4. Where poor practice is considered to have occurred, in the first instance, staff should discuss with their line manager or the Safeguarding Manager. An incident report will then be required to be completed. Where the allegation is in regard to a Club or FFCF member of staff the appropriate line manager will be required to complete a full incident report with all appropriate information. An internal investigation will be followed and all relevant information will be assessed and reviewed by the Safeguarding Manager and appropriate Line Manager or HR Manager, in order to make a decision about any poor practice that is alleged to have happened.
- 21.5. If a member of staff believes that this route has been ineffective, whistleblowing procedures are in place for such concerns to be raised. Please see FFC Whistleblowing Policy.
- 21.6. Investigations into possible abuse will require careful management. In these cases the Safeguarding Manager will first seek the advice of the Football Association 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.
- 21.7. In any case of suspected abuse, as soon as the Local Authority or the Police have been informed, the Club must provide a report to the FA Head of Safeguarding Children, the Football League Head of Safeguarding Children and inform the Club's Chief Executive Officer. Any external local authority provision will naturally take the lead on any case.

- 21.8. Providing it is appropriate to do so the Safeguarding Manager will maintain constant dialogue with all parties involved with the allegation until such time as the matter has reached a reasonable outcome, taking the lead from the external agency. Escalation to inform board level will take place at the Safeguarding Managers earliest opportunity.
- 21.9. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 and email help@nspcc.org.uk

22. Allegations of abuse against members of Fulham Staff

- 22.1. If the report involves an allegation about any member of Club or FFCF staff (whether full time, part time, paid, unpaid, contracted, engaged, voluntary etc.) and the Club or FFCF believes 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 he or she is unsuitable to work with children,
- 22.2. The Safeguarding Manager or DSO shall immediately inform the LADO of the Borough where the alleged incident took place so that he or she can consult with the Police and local authority children's social care colleagues as appropriate. Where the SM or DSO are unsure as to whether the report meets the criteria stated above, the advice of the LADO shall still be sought.
- 22.3. Advice from HR will also be sought and depending on the nature of the allegation, there may need to be consideration for redeployment or even suspension as a neutral act pending the investigation. This is needed in certain circumstances to protect both the professional from further allegations being made and the children from being subjected to further risk until there is more proof as to what happened.
- 22.4. 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 had been sought and only then in consultation with the SM.
- 22.5. Providing it does not contradict with any advice received from the LADO, any internal investigation will be carried out in line with the Club's People Management Policy and either general or department-specific Grievance Procedures, insofar as they are applicable.

Historical Allegations

- 22.6. Historical Allegations concerning staff who no longer work at the Club, or historical allegations will be reported to the Local Authority Designated Officer and the police even if the alleged perpetrator of the abuse is believed to be deceased.

Charity Commission

- 22.7. In addition to statutory reporting to either the LADO or Police, FFCF are also responsible for reporting serious incidents to the Charity Commission.
- 22.8. The Charity Commission details what to report on their website and although not exhaustive, includes the following criteria:
- A beneficiary within the charity's care has/alleges to have suffered serious harm;
 - Allegation that a staff member has physically assaulted a beneficiary

- A volunteer, following an incident of abuse or neglect of a beneficiary, has resigned during an investigation of the incident
- FFCF failed to carry out DBS checks which would have identified that a member of staff or trustee was disqualified in law (under safeguarding legislation) from working with children or adults
- A beneficiary of FFCF has died or been seriously harmed; a significant contributory factor is a policy or procedural failure by the charity, and/or the way it has worked with other agencies
- FFCF discovers that an employee or volunteer, in contact with children or vulnerable adults, is on the sex offenders list
- A member of FFCF staff or volunteer has been arrested for terrorism related offences
- A visiting speaker has used an FFCF event to promote extremist messages, via live speech or social media

22.9. The Charity Commission are clear that if you are in doubt about what to report, report it.

23. Confidentiality

- 23.1. There is always tension and caution around issues of confidentiality. The advice for all staff at the Club and FFCF 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).
- 23.2. 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 and any marks raising concern should be recorded on the skin map included within the incident and report form.
- 23.3. 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 a DSO or the Safeguarding Manager.

24. Continuous Learning and Development

- 24.1. The Club and FFCF understands that risk can only be mitigated not eradicated. Therefore it is critical that the Club and FFCF work within a culture of continuous learning in order to ensure a high quality of service provided to all. Where an incident or accident occurs or a complaint is received, the Club and FFCF are committed to investigating, reviewing and evaluating the circumstance and/or event in order to understand what has happened and most importantly what controls can be implemented in order to mitigate the risk of the incident, accident or complaint occurring again. Please refer to the Incident Reporting Policy and Procedure for more information on learning from an accident, incident or complaint.
- 24.2. In order to ensure a proactive approach to the quality of safeguarding practice. The Safeguarding Manager co-ordinates a programme of thematic audits throughout the year, the findings of which are reported to the Clubs Management Board or the Board of Trustees, respectively. Where further learning and improvements can be made, the Safeguarding Manager will lead on a quality improvement plan with the appropriate departmental head.
- 24.3. The Club and FFCF values the continuous development of all staff, volunteers and participants in line with the Safeguarding Strategy in order to increase the capability of their workforce; and to add value to existing service, systems and frameworks in order to ensure safe and effective services for children and young people.

- 24.4. It is the responsibility of the Safeguarding Manager and Senior Safeguarding Manager to ensure the Club and FFCF are fully compliant with the required annual Safeguarding training delivered by “the League” and “the FA”. It is also the responsibility of the Safeguarding Manager, Senior Safeguarding Manager and Designated Safeguarding Officers to ensure the workforce keep up to date with emerging safeguarding and inclusion issues by way of attending workshops, conferences and learning and engaging with current affairs, serious case reviews and other relevant issues.
- 24.5. All staff and volunteers who are working with children and young people are requested to attend annual Safeguarding Briefings and workshops delivered by the Safeguarding Manager on relevant and up to date subjects in order to keep the participants of all sports programmes safe.

25. Safeguarding Contacts

Eleanor Rowland
Safeguarding Manager
M: [07876 003298](tel:07876003298)
E: erowland@fulhamfc.com

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General Counsel
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Foundation
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Jan Seymour
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Leighton Jones
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Steve White
Safety / Match day
E: swhite@fulhamfc.com

26. External Contacts

FA Premier League
Jess Addicott
Head of Safeguarding
E: safeguarding@premierleague.com
T: 0207 864 9000

The Football Association
Sue Law
Head of Safeguarding Children
E: sue.law@thefa.com
T: 020 7745 4649

The Football League
Alexandra Richards
Safeguarding Manager
T: 01772325811

Hammersmith and Fulham Out of Hours
Children’s Emergency Duty Team (24 hour)
Tel: 020 8748 8588

Hammersmith and Fulham Social Services
Child Protection Team
Tel: 020 8753 6600
Email: familyservices@lbhf.gov.uk

Dependent on where the child or young person resides will depend on which Local Authority should be contacted. Please contact Eleanor Rowland, Safeguarding Manager in all circumstances who will confirm which Local Authority is dealing with the matter.

THE FA: 0808 800 5000
 NSPCC HELPLINE: 0800 056 0566
 NSPCC SMS: 88858

27. External Resources

- **FA Safeguarding Children Guidelines:**
<http://www.thefa.com/TheFA/WhatWeDo/FootballSafe/Downloads>
- **London Child Protection Procedures (2018)**
http://www.londoncp.co.uk/chapters/A_contents.html
- **Keeping Children Safe in Education (September 2016)**
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550511/Keeping_children_safe_in_education.pdf
- **Working Together to Safeguard Children 2018:**
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419595/Working_Together_to_Safeguard_Children.pdf
- **Standards for safeguarding and protecting children in sport (2005)**
<https://thecpsu.org.uk/resource-library/2013/standards-for-safeguarding-and-protecting-children-in-sport/>

28. Date and review

- 28.1. This policy is applicable to Season 2018/19 and is under constant review. A revised policy will be drafted annually with the next scheduled review due in July 2019 for use in the following season. The policy may also be subject to review following incident learning outcomes, a major incident, organisational or legislative change.

29. Appendix

Table of Changes

Section Reviewed	Change made
Rules, Regulations & Legislation	<p>Removed</p> <p>EFL Safeguarding Standards Working Together to safeguarding Children 2015 London Safeguarding Procedures 2017</p> <p>Added</p> <p>Working Together to Safeguard Children 2018 Premier League Safeguarding Standards 2018-19 London Safeguarding Procedures 2018</p>
Scope and Governance	<p>Added</p> <p>Reference to Privacy Policy</p>
Aims and Key Principles	<p>Added</p> <p>Premier League 2019-18 Safeguarding Standards, NSPCC Standards, London Safeguarding Children Board; Child Protection Procedures, 2018.</p>
9.9 Academy Ratios	<p>Removed</p> <p>EFL guidance</p> <p>Added</p>

	Premier League Youth Development Rules
10.1 Coaching Staff	Removed EFL Added Premier League
11.4 Scouts	Added Premier League Development Rules 11.4. The Club only permits Scouts from other Clubs to attend its Academy Games Programme matches in accordance with the provisions of the Premier League Youth Development Rules. For instance any Scout who attends an Academy match from another club must: <ul style="list-style-type: none"> • notify both Clubs involved in the match of the Scout’s proposed attendance by no later than 12 noon on the last Working Day before the published date of the match; • the Scout is able to produce on demand to the home Club the identification card issued to him by his Club in accordance with the Premier League Rules; and • inform the home Club of his arrival at a match. 11.5. A Scout shall conduct himself at all times in an ethical and professional manner and shall observe the highest standards of integrity and fair dealing. 11.6. FFC shall prepare and produce a document setting out the process of how Scouts employed by that Club should approach Academy Players (and other players) and the process thereafter. Such process should comply in full with the Premier League Rules, these Rules and the Code of Conduct for Scouts.
14.4 International Tournaments	Removed EFL
17.7 Medical	Removed Intermediate First Aid for Sport Added FA Level 4 Intermediate Trauma Medical Management in Football
Academy	Added Academy Registration Absence Head Count Dispersal
Safeguarding Contacts	Removed Kieran Crombie Added Katy Shepard
Date and Review	Removed Reference to 17/18 Added Reference to 18/19