



## SAFEGUARDING CHILDREN POLICY AND BEST PRACTICE GUIDELINES

### Policy Statement

Swansea City AFC Foundation is committed to safeguarding and promoting the welfare of children and young people involved in the Foundations' activities and events. It aims to provide an enjoyable environment and contribute to the Welsh Government's vision for all children and young people in Wales to:

- have a flying start in life;
- have a comprehensive range of education and learning opportunities;
- enjoy the best possible health and are free from abuse, victimisation and exploitation;
- have access to play, leisure, sporting and cultural activities;
- be listened to, treated with respect, and have their race and cultural identity recognised;
- have a safe home and a community which supports physical and emotional wellbeing;
- are not disadvantaged by poverty

This policy outlines the Foundation's commitments and key arrangements to safeguard children and will remain in place until such time as it is replaced or revoked by the Foundation.

It has been approved by the Local Children Safeguarding Board and promotes the statutory guidance for safeguarding and promoting the welfare of children as set out in Working Together to Safeguard Children 2004.

For the purposes of this policy, a child is someone under the age of 18 years.

All Foundation Staff, contractors and unpaid workers, who engage in regulated activities with children must make themselves aware of the Foundation's Safeguarding Children's Policy and associated procedures and follow them at all times.

Swansea City AFC Foundation has a safeguarding training programme.

Through the application of this policy and the Foundation's procedures we will seek to develop a positive and proactive approach to safeguarding in our projects programme. This will enable children and individuals working with them to participate in our projects in an enjoyable and safe environment.

In recognition of the importance of promoting and safeguarding the welfare of children and young people Swansea City AFC Foundation has designated Graham Smith as its Safeguarding Manager. More Information about the role of the Safeguarding Manager can be found later in this document.



The Foundation fully acknowledges and accepts its responsibility for the safety and well-being of children and young people, who engage in any way in any activity carried out with the Foundation.

Their welfare and safety is of paramount importance. It is the duty of all adults working at the Foundation to safeguard the welfare of children and young people by creating an environment that protects them from harm.

Activities which children and young people may be involved in with Swansea City AFC Foundation include, but are not limited to: education programmes such as Premier League Primary Stars or Premier League Inspires sessions, Holiday soccer camps, Youth Engagement activities such as Premier League Kicks and match day Family Zone activities.

During Family Zone activities, or any other Club organised activities the Club's own Safeguarding Policies have primacy.

The Foundation will ensure that the voices of Children and Young People are heard in individual decision making and when designing new projects and services. Consultation with young people will be conducted through our project delivery, as well as individually when relevant.

### **Legislation, Regulations, Rules, Policies and Procedures related to Safeguarding children**

The Foundation recognises its duty to follow all recent and relevant legislation and regulations and Rules at the date of publication.

The Foundation has an extensive range of procedures and guidance that must be used in conjunction with this policy to ensure that children are safeguarded and national standards for safeguarding are met and implemented throughout the Foundation.

These procedures incorporate a range of requirements including those of:

- The Premier League Rules (in particular Section S),
- The FA Safeguarding Children Rules,
- The Children Act 1989 and 2004,
- Social Services and Wellbeing (Wales) Act 2014
- Working Together to Safeguarding People
- The Wales Safeguarding Procedures for children and adults at risk of abuse and neglect
- The current Independent Safeguarding Authority,
- The Government scheme under the Protection of Freedoms Act 2012 which merged the responsibilities of the Criminal Records Bureau with the Independent Safeguarding Authority
- Care Act 2014
- Equality Act 2010
- Human Rights Act 1998
- Mental Capacity Act 2005



- Sexual Offences Act 2003
- Data Protection Act 1998 & 2018
- General Data Protection Regulations 2016/679

\* please note that this list is not exhaustive

The Foundation also follows the All Wales Child Protection Procedures 2008 which are the nationally recognised process that all those working with children and young people in Wales must follow.

The Foundation's safeguarding policies, procedures and associated documents are held centrally at the Safeguarding Manager's office and can be accessed by Staff and unpaid workers via the Sharefile system and the Foundation page of the Swansea City website. Copies can also be requested directly from the Safeguarding Manager whose contact details are at the end of this document. All Staff and unpaid workers are responsible for familiarising themselves with these documents and following them at all times. At Family Zone activities a copy of this policy and the Club's policy will be available in the resources box.

The Foundation also has a responsibility to maintain regular dialogue with the Local Safeguarding Children Board.

### **Aims & Key Principles**

The aims of the Foundation's Safeguarding Children Policy are:

- To safeguard all children and young people who interact with the Foundation
- To demonstrate best practice in the area of safeguarding children
- To develop a positive and proactive welfare programme to enable all children and young people to participate in an enjoyable and safe environment
- To promote high ethical standards throughout

The key principles underpinning this policy are:

- The child's or young person's welfare and safety 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, racial origin, religious beliefs or sexual identity.
- All allegations of abuse will be taken seriously and responded to efficiently and appropriately.
- To ensure that staff, coaches, parents and other adults who come in contact with children and young people provide good role models of behaviour.

**Safeguarding Manager, Children's Safeguarding Manager (CSM) & Safeguarding Officers (SO)**



The Foundation has appointed a Safeguarding Manager who has responsibility for safeguarding in all areas of the Foundation. The Safeguarding Manager is: Graham Smith

The Safeguarding Manager will promote awareness of safeguarding best practice and develop appropriate links and relationships across the whole of the Foundation.

The Safeguarding Manager is also the Children's Safeguarding Manager (CSM). He shall ensure that the Safeguarding Policy and Procedures are updated and in line with current legislation and regulations, and will liaise with The Premier League, the English Football League, the Football Association, the Local Safeguarding Children Board and other appropriate and statutory agencies in matters of safeguarding and child protection.

A number of Safeguarding Officers, who work as designated persons within various areas of the Foundation, have also been appointed. The Safeguarding Officers have special responsibilities and are the focal point for safeguarding children in the area of their specific activity, as well as a duty to Foundation -wide safeguarding.

Any person/s with concerns about a child or young person's welfare must report a concern to the; Safeguarding Manager or if they cannot be contacted; the designated Safeguarding Officers. Further information about how to report a concern can be found later in the document however a child is at immediate risk the police should be called.

## **Recruitment & Disclosure**

As part of the Foundation's recruitment and selection process any offers of work involving working in regulated activity with children are subject to a satisfactory Enhanced DBS (Disclosure and Barring Service) Disclosure and Barred List Check (depending on the level of supervision and frequency and nature of contact with children). Appropriate references are also required in line with Premier League rule S.11.2. This includes paid employees, and unpaid workers. If you have any queries on the DBS process, please contact the Foundation's Lead Disclosure Officer who will be happy to explain the criteria and procedure for DBS Service checks.

All requests for DBS clearances are routed via the Online Disclosures GBG online application process.

All offers of work are subject to the outcome of the screening process.

Until such time as a satisfactory Disclosure certificate has been received, the new employee or unpaid worker will be asked to sign a self-declaration form and will not be left unsupervised with children.

All employees, contractors or unpaid workers in a position of trust will be required to undergo regular Enhanced DBS Disclosure clearances, normally every 3 years (or earlier if requested by the Safeguarding Manager), as a condition of their employment.



Should an individual's DBS Disclosure reveal any convictions the Foundation will consider whether the nature of the offence /offences renders the person concerned unsuitable for working with children. In such circumstances, when the nature of any disclosure has to be considered, a risk assessment will be carried out by the Safeguarding Manager with the Head of Community and/or Head of Department to assess the information contained within the disclosure certificate. The member of staff may also be asked to attend an interview prior to a recruitment decision being made.

On occasions the Head of Safeguarding at the Premier League and/or the Children's Services Safeguarding Principal Officer may be asked to attend the risk assessment meeting.

### **Temporary Staff and External Consultants**

The Foundation will ensure that all temporary staff and external consultants sign a self-declaration form and will not have unsupervised access to children during their time with the Foundation.

### **Training for Employees and Workers**

All employees or workers working in direct contact with children are required to complete a safeguarding induction and annual refresher training relevant to their role.

Details of those satisfactorily completing this course are retained by the Safeguarding Manager.

### **Responsibility of Safeguarding Children – Position of Trust and Duty of Care**

The Foundation acknowledges its responsibility to safeguard the welfare of every child and young person who has been entrusted to its care and is committed to working to provide a safe environment.

All members of Staff are accountable for the way in which they exercise authority, manage risk, use resources and protect children from discrimination and avoidable harm.

To ensure best practice at all times staff are made fully aware of this Safeguarding Policy and the responsibilities which form part of their employment with the Foundation.

All Foundation employees (including unpaid workers) and contractors, whether paid or voluntary, have a duty of care to keep children safe this can be exercised through the development of respectful, caring and professional relationships between staff and children.

Behaviour by Foundation employees and volunteers that demonstrates integrity, maturity and good judgement is essential, and all staff and unpaid workers must sign a code of conduct.

Any person responsible for a child or young person, whether solely or jointly, is in a position of trust which requires behaviour to be in accordance with this policy. A 'person responsible'



includes; a head of a department, member of Foundation staff or unpaid worker working with children, a coach, a driver, a learning mentor/tutor, as well as staff engaged in match day activity involving children and young people, including supervising mascots, photographers.

The Foundation will use its best endeavours to ensure that no person with any conviction for any aspect of child abuse will be employed in a position which involves contact with children and young people.

All Foundation staff working with children and young people have signed up to and thereby agree to the principles as set out in the Premier League Guidance for Safe Working Practice.

### **Signs, Indicators and Forms of Abuse**

There are six main types of child abuse: neglect, **physical abuse, sexual abuse, emotional abuse, bullying and domestic abuse. The abuser may be a family member, or they may be someone the child encounters in a residential setting or in the community, including during sports and leisure activities.** An individual may abuse or neglect a child directly, or may be responsible for abuse because they fail to prevent another person harming that child.

It is also important to be aware that a child may be abused by an adult or adults, or another child or children.

#### **•Neglect**

Neglect is the persistent failure to meet a child's basic physical and / or psychological needs. It may involve a parent or carer failing to provide adequate food, shelter and clothing, failing to protect a child from physical harm or danger or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of or unresponsiveness to, a child's basic emotional needs.

#### **•Physical Abuse,**

Physical abuse may involve hitting, shaking, throwing, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a child whom they are looking after. 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, whether or not the child is aware of, or consents to, what is happening. The activities may involve physical contact, including penetrative acts such as rape, buggery or oral sex or non-penetrative acts such as fondling. Sexual abuse may also include non-contact activities, such as involving children in looking at, or in the production of, pornographic



material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways. Boys and girls can be sexually abused by males and/or females, by adults and by other young people. This includes people from all different walks of life.

#### • Emotional Abuse

Emotional abuse is the persistent emotional ill treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve making a child feel or believe that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person.

#### • Bullying

Bullying is also a significant issue and is not always easy to define and can take many forms. The three main types are: physical, verbal and emotional.

Bullying may constitute physical, verbal or emotional abuse depending on the circumstances. The Foundation has an anti-bullying Policy and procedure.

#### • Domestic Abuse

The Government defines domestic violence/abuse as "Any incident of threatening behavior, violence or abuse (psychological, physical, sexual, financial or emotional) between adults who are or have been intimate partners or family members, regardless of gender or sexuality."

This includes issues of concern to black and minority ethnic (BME) communities such as so called 'honour' based violence, female genital mutilation (FGM) and forced marriage, and is clear that victims are not confined to one gender or ethnic group.

The effects of domestic abuse on children can be great. As well as sometimes being the direct victims of domestic abuse children may be witnesses to abuse against a parent/carer/other family member. There is evidence that when a child witnesses domestic abuse it can have a substantial damaging and potentially long-lasting effect upon on a child's development, psychological and emotional well-being. As a result, since 2004, a child 'witnessing the ill treatment of another person' such as a domestic abuse incidents, should be formally recognised as a safeguarding concern.

#### **What to do if you Suspect Abuse has occurred?**

Anyone working for or with Swansea City AFC Foundation should be aware that abuse can arise in our working environment and that they must report any concerns according to this policy. However they must also report if they have concerns that a child might be being abused outside the our environment e.g. at home, school. This concern could be as a result of issues they have observed or something that a child chosen to confide in them about.

If you are concerned about the welfare of a child or young person or you are concerned about a person's (adult or child) behaviour towards a child you must act.



Do not assume that someone else will help the child. Safeguarding children is everyone's responsibility.

It is important that you report your concerns to either the;

- Safeguarding Manager or
- Deputy Safeguarding Manager

(Contact details can be found at the end of the policy).

**However**, if the child or young person is or may be in **immediate danger** the police should be contacted in the first instance on 999.

Taking no action is not an option.

All matters will be fully investigated, and appropriate action will be taken in accordance with the Foundation's procedures, guidance, legislation and the All Wales Child Protection Procedures.

After reporting the concern, the action taken will depend on the circumstances and will be overseen by the Safeguarding Manager. Actions may include a referral to the Police or Children Services and to the Premier League.

Remember the child's welfare is of paramount importance.

### **Good Practice**

All personnel should adhere to the following principles and action:

- Always work in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication with no secrets).
- Make the experience of Foundation activity fun and enjoyable: promote fairness, confront and deal with bullying.
- Treat all children equally and with respect and dignity.
- Always put the welfare of the child first.
- Maintain a safe and appropriate distance with children and young people and avoid unnecessary physical contact with them.
- Where any form of manual/physical support is required it should be provided openly and with the consent of the child. Physical contact can be appropriate so long as it is neither intrusive nor disturbing and the child's consent has been given.
- If groups have to be supervised in changing rooms always ensure adults etc work in pairs.
- Request written parental consent if Foundation employees are required to transport children.
- Gain written parental consent for any significant travel arrangements e.g. overnight stays.
- Ensure that at away events adults should not enter a child's room or invite children to their rooms.



- Be a good role model, this includes not smoking or drinking alcohol in the company of children.
- Always give enthusiastic and constructive feedback rather than negative criticism.
- Secure parental consent for the Foundation to act in loco parentis, to give permission for the administration of emergency first aid or other medical treatment if the need arises.
- Keep a record of any injury, safeguarding incident or disclosure that occurs, along with details of any subsequent action taken.

The Foundation has a number of documents available on Sharefile that relate to good practice in specific scenarios. All staff must make themselves aware of the content of these documents and abide by the guidelines they offer.

### **Poor Practice**

The following are regarded as poor practice and should be avoided by all employees, contactors and volunteers:

- Unnecessarily spending excessive amounts of time alone with children away from others.
- Being alone in changing rooms, toilet facilities or showers used by children and young people.
- Taking children alone in a car on journeys, however short.
- Taking children to your home where they will be alone with you.
- Sharing a room with a child.
- Engaging in rough, physical or sexually provocative games, including horseplay.
- Allow or engage in inappropriate touching of any form.
- Allowing children to use inappropriate language unchallenged.
- Making sexually suggestive comments to a child, even in fun.
- Reducing a child to tears as a form of control.
- Allow allegations made by a child to go unchallenged, unrecorded or not acted upon.
- Do things of a personal nature that the child can do for themselves.

### **What to do if you are concerned about poor practice**

You **must act** if you are concerned about poor practice

It is important that you report your concerns to the;

- Safeguarding Manager

All matters will be fully investigated, and appropriate action will be taken in accordance with the Foundation's procedures, guidance, and current legislation.

Additional actions will also be taken if there is a concern that a child may have been a victim of abuse as a result of poor practice. This action may include referral to the Police or Children Services and to the Premier League.



## Use of Photography & Film Images

The Foundation takes its guidance on the use of images from guidelines issued by The FA and Premier League and EFL.

All images are taken by Foundation employees who have been briefed by the Safeguarding Manager or by a member of the Communications and Marketing Department responsible for the activity being photographed or filmed.

Before taking images of children, parental consent is sought in writing at the start of the academic year or prior to the event. Parents/Carers/Guardians are responsible for informing the Foundation of any change of circumstances within the academic year which may affect consent.

- Parents/Carers/Guardians will be informed of how the image will be used. The Foundation will not allow an image to be used for something other than that for which it was initially agreed.
- All children featured in Foundation 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 Foundation photographers will, where applicable, undertake a DBS check and attend an FA Safeguarding Children in Football 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 Premier League. Foundation identification will be worn at all times.
- Children who are the subject of a court order will not have their images published in any Foundation document.
- No images of children featured in Foundation publications will be accompanied by personal details such as their home address.
- Any instances of inappropriate images in Foundation activities will be reported to the Safeguarding Manager.

## Social Networking Guidance

The Foundation recognises that social media and social networking services provide opportunities to effectively engage with a wide range of audiences in a positive manner. However, the Foundation is also aware of the potential safeguarding risks especially to children and young people when using these forms of media.

Social Networking is dealt with in full in the Foundation's Social Media policy available on the Foundation Sharefile.

## Confidentiality



Employees or workers may have access to confidential information about children in order to undertake their responsibilities. In some circumstances, employees may be given highly sensitive or private information. They should never use confidential or personal information about a child or their family for their own or others' advantage.

Information must never be used to intimidate, humiliate or embarrass children.

Confidential information about a child should never be used casually in conversation or shared with any person other than on a need-to-know basis.

In circumstances where the child's identity does not need to be disclosed, the information should be used anonymously.

There are some circumstances in which an employee or worker may be expected to share information about a child, for example when abuse is alleged or suspected. In such cases, individuals have a duty to pass information on without delay, but only to those with designated safeguarding responsibilities.

If an employee or volunteer is in any doubt about whether to share information or keep it confidential, they should seek guidance from the Foundation's Safeguarding team.

Any media or legal enquiries should be referred to the Foundation's Head of Community or, in their absence, to their deputy.

The storing and processing of personal information about children is governed by the Data Protection Act, 1998. For further information on the Foundation's (and your) obligations under the Data Protection Act 1998, please see the Foundation's Data Handling & Processing Policy, available on the Foundation's Sharefile.

This means that Employees or unpaid workers:

- Are expected to treat information they receive about children in a discreet and confidential manner;
- Should seek advice from the Club's Legal Department if they are in any doubt about sharing information they hold or which has been requested of them;

**The Foundation is committed to protecting children and young people and will take action to uphold this commitment**

Contact Details



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Signed on behalf of the Trustees

Name: Jonathan Wilsher

Sign: *Jonathan Wilsher*

Date: 13/10/2021

Name: Rebecca Edwards-Symmons

Sign: *Rebecca Edwards-Symmons*

Date: 13/10/2021