



SWANSEA FOUNDATION SAFEGUARDING CHILDREN POLICY

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 promotes the statutory guidance for safeguarding and promoting the welfare of children as set out in Wales Safeguarding Procedures.

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

All Foundation Staff, contractors and volunteers, who carry out activities on behalf of the Foundation 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 wellbeing 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 everyone carrying out activities on behalf of the Foundation to safeguard the welfare of children and young people by working together to



ensure there is a collaborative, cohesive, multidisciplinary approach to promoting and protecting the safety, welfare and wellbeing of children.

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 from legislation and regulation, the details of which can be found in Appendix 1.

The Foundation recognises that that extremism and exposure to extremist materials and influences can lead to poor outcomes for stakeholders. Therefore the Foundation has a Prevent Policy and Procedures which aim to support in the creation and maintenance of a safe, healthy and supportive learning and working environment for all stakeholders.

The Foundation's safeguarding policies, procedures and associated documents can be accessed by Staff and volunteers 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 volunteers 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.



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.

Leadership and Oversight

The Foundation's board of Trustees hold ultimate responsibility for Leadership and oversight for safeguarding within the organisation. Safeguarding will be a standing item on the agenda of the board and they will receive, review and act upon an annual safeguarding report.

The board also have responsibility to ensure the Prevent policies and procedures are in place and acted upon when appropriate within the Foundation.

There is a designated safeguarding Trustee on the board who will take responsibility for the Foundation's safeguarding arrangements. They will link directly with the Foundation's Safeguarding Manager to ensure compliance and good practice is established and maintained across the Foundation.

The Head of Foundation will ensure appropriate arrangements are in place for the day-to-day management of safeguarding within the Foundation and will line manage the Safeguarding Manager.

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. This includes oversight of the Foundation's policy and procedures. The Safeguarding Manager is: Graham Smith

The Safeguarding Manager has direct access to the designated Safeguarding Trustee to report on safeguarding matters and can seek their input and guidance when appropriate.

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 will also be the Prevent Lead for the Foundation, with responsibility for ensuring that the Prevent Strategy is implemented across the Foundation and that any concerns are shared with the relevant organisations.

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 volunteers. If you have any queries on the DBS process, please contact the Foundation's Safeguarding Manager who will be happy to explain the criteria and procedure for DBS Service checks.

All requests for DBS clearances are routed and processed via the First Advantage Online Disclosures system.

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

All employees, contractors or volunteers 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. They will also complete a safeguarding self-declaration form on an annual basis.

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 Foundation 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 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 regular 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. This includes those with additional vulnerabilities including those who identify as LGBTQ+; children playing or working in an adult environment; those with care experience; care leavers and looked after children.

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. Please see appendix 2 for our de-escalation statement

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 volunteers) 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 volunteers must sign a code of conduct.

A Foundation staff member, casual staff member or volunteer who is in a coaching, training or supervising or instructing role with a young person aged 16-17 that is taking part in Foundation activities is deemed to be in a 'Position of Trust'. This means they are not legally allowed to engage in sexual activity with that young person even though they may be over the age of consent.

The Sexual Offences Act 2003, states that a position of trust offence is committed when an adult in a position of trust within a sporting organisation engages in sexual activity with a child in their care, even if that child is over the age of consent (aged 16 or over in the UK).

If a staff member is suspected to be in breach of position of trust they will be reported to the police and subject to Foundation disciplinary procedures.



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 **five** main types of child abuse: **physical abuse, emotional/psychological abuse, sexual abuse, financial abuse and neglect. 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.

Physical Abuse

Physical abuse means deliberately hurting a child or young person. It includes: physical restraint; such as being tied to a bed, locked in a room, inflicting burns, cutting, slapping, punching, kicking, biting or choking, stabbing or shooting, withholding food or medical attention, drugging, denying sleep, inflicting pain, shaking or hitting babies, fabricating or inducing illness.

Emotional/psychological Abuse

Emotional abuse is the ongoing emotional maltreatment of a child. It's sometimes called psychological abuse and can seriously damage a child's emotional health and development. Emotional abuse can involve deliberately trying to scare or humiliate a child or isolating them or ignoring them. Children who are emotionally abused are often suffering another type of abuse or neglect at the same time. Emotional abuse includes: humiliating or constantly criticising a child, threatening or shouting at a child or calling them names and making them the subject of jokes. It can also be using sarcasm to hurt a child, blaming, scapegoating, making a child perform degrading acts, not recognising a child's own individuality, trying to control their lives, pushing a child too hard or not recognising their limitations, exposing a child to distressing interactions such as domestic abuse or drug taking, failing to promote a child's social development, not allowing them to have friends, persistently ignoring them, being absent, manipulating a child, never saying anything kind, expressing positive feelings or congratulating a child on successes, never showing any emotions in interacts with a child also known as emotional neglect.

Sexual Abuse

There are two different types of child sexual abuse. These are called contact abuse and non-contact abuse. Contact abuse involves: touching activities where an abuser makes physical contact with a child, including penetration. It includes: sexual touching of any part of the body whether or not the child is wearing clothes, rape or penetration by putting an object or body part inside a child's mouth, vagina or anus, forcing a child to take part in sexual activity, making a child take their clothes off, touch someone else's genitals or masturbate. Non-contact abuse involves: non-touching activities such as grooming, exploitation,



persuading children to perform sexual acts over the internet and flashing. It includes encouraging a child to watch or hear sexual acts, not taking proper measures to prevent a child being exposed to sexual activities by others, meeting a child following sexual grooming with the intent of abusing them, online abuse including making, viewing or distributing child abuse images, allowing someone else to make, view or distribute child abuse images, showing pornography to a child, sexually exploiting a child for money, power or status (child exploitation)

Financial Abuse

Financial abuse includes theft, fraud, pressure about money, misuse of money.

Neglect

This means a failure to meet a person's base physical, emotional, social or psychological needs, which is likely to result in an impairment of the person's wellbeing (for example, an impairment of the person's health).

Harm

Harm means the abuse or the impairment of (a) physical or mental health, or (b) physical, intellectual, emotional, social or behavioural development. The references to 'harm', in relation to section 47 enquires means significant harm. Therefore practitioners must, where the question of whether harm is significant turns on the child's health or development, the child's health or development is to be compared with that which could reasonably be expected of a similar child.

What to do if you Suspect Harm or Abuse has occurred?

Anyone carrying out activities on behalf of Swansea City AFC Foundation should be aware that harm or 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 or 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

Permanent staff members and casual staff members should report concerns through the Foundation's MyConcern system. They are also able to contact the Safeguarding Manager for advice regarding safeguarding issues and concerns.

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:

- Be a role model, displaying consistently high standards of behaviour and appearance
- Always use language that is appropriate and socially acceptable
- Always work in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication with no secrets)
- Make the experience of the activity fun and enjoyable; promote fairness and confront and deal with bullying or discriminatory behaviour
- 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.
- Make sure staff are appropriately qualified for the task they are carrying out and that a first aider is present.
- 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 followed up in a timely manner, and appropriate action will be taken in accordance with the Foundation's procedures, guidance, and current legislation. All reports of abuse (disclosures) will be followed up within 24 hours.

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 notification of funders.

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 and Data Protection

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.

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 Manager.



Any media or legal enquiries should be referred to the Head of Foundation or, in their absence, to the Senior Management Team

The storing and processing of personal information about children is governed by the Data Protection Act, 2018 and the UK General Data Protection Regulations (GDPR). For further information on the Foundation's (and your) obligations under the Data Protection Act 2018 and UK GDPR, please see the Foundation's Data Protection Policy and Data Security Policy, available on the Foundation's Sharefile.

This means that Employees or volunteers:

- 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

Swansea City AFC Foundation Safeguarding Manager
Graham Smith
Tel: 07469 158112
Email: graham@swansfoundation.org.uk

SCFC Safeguarding Manager
Rebeca Storer
Tel: 01792 616419
Email: rebecastorer@swansea.com

Signed on behalf of the Trustees

Andrew Rhodes  11/11/2022

Rebeca Storer  11/11/2022



Appendix 1: List of Legislation and Regulations

- Wales Safeguarding Procedures
- Social Services and Well-being (Wales) Act 2014
- Keeping Children Safe in Education 2020
- United Nations Convention on the Rights of the Child 1989
- United Nations Convention on the Rights of Disabled People
- Wales Accord for the Sharing of Personal Information
- Children Act 1989 and 2004
- Well-being of Future Generations (Wales) Act 2015
- Counter Terrorism & Security Act 2015
- Equality Act 2010
- Human Rights Act 1998
- Mental Capacity Act 2005 (revision 2007)
- Protection of Freedom Act 2012
- Sexual Offences Act 2003
- Safeguarding Vulnerable Groups Act 2006
- Data Protection Act 1988
- General Data Protection Regulations
- Public Interest Disclosure Act 1998
- Serious Crimes Act 2015

* please note that this list is not exhaustive

Appendix 2: De-escalation Statement

It is Foundation Policy that staff should use de-escalation techniques to calm any participants who may be displaying argumentative attitudes or aggressive behaviours towards their peers, staff or bystanders. In the event of a physical altercation involving participants after de-escalation efforts have been unsuccessful or if there is no opportunity to utilise them, Foundation staff are responsible for moving all other participants, bystanders and volunteers to safety. The lead member of staff will then call the police if necessary and coordinate the response after the incident has been resolved. This will include, but is not limited to, contacting parents, carers or guardians, contacting the Safeguarding Manager and uploading an account of the incident to the MyConcern system in a timely manner.

It is not Foundation policy to physically intervene in a violent confrontation.