



**SWANSEA CITY ASSOCIATION FOOTBALL CLUB
LIMITED**

CHILDREN'S SAFEGUARDING POLICY

<https://swanseacity.cpoms.net/>

Document History

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This document can be accessed from the following location:

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Revision History

The latest revision can be found at the top of the list

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Approvals

This document requires the following approvals:

Name	Version	Date of Approval	Signature
Tom Gorringe	V10.1	19/06/2025	

Principles

Swansea City Association Football Club Limited (The Club) seeks to ensure the safety and well-being of all children and young people who engage in activities with the Club.

It is through the application of the Policies and Procedures that the Club seek to develop a positive and proactive welfare programme to enable all children and young people to participate in an enjoyable and safe environment. This equally applies to the safety and security of those working with and responsible for the activities involving children and young people.

The Policy and Procedures have been approved and endorsed by the Board of Directors and promotes the statutory guidance for safeguarding and promoting the welfare of children. The Club will also ensure compliance with the Protection of Freedoms Act 2012 and Data Protection Act 2018.

If you work or intend to work with children or 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 children and young people's development can be significant.

Ultimately, safeguarding is everyone's responsibility.

Scope

This Policy is for use across the whole Club and is to be observed by all those working with children and young people. The application of this Policy and Procedures across the Club for promoting safeguarding good practice is mandatory.

All the requirements are obligatory and are to be enforced as indicated by the appropriate persons in all cases where there are any suspected instances of poor practice or abuse.

All employees, workers, consultants, agency staff and volunteers must make themselves aware of the Club's Safeguarding Children Policy and Procedures and where appropriate their work with children and young people will be supported by a safeguarding training programme.

The Head of Safeguarding is Rebeca Storer.

The Player Care Manager is Lloyd Griffin.

The Academy Designated Safeguarding Lead is Allan Davies.

The Club 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 Club.

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

Activities undertaken by Club departments at the following locations are under the remit of this Policy including; *(this list is not exhaustive)*

Swansea.com Stadium
Swansea City AFC Academy
Fairwood Training Ground
Development Centres
Host Family Accommodation
Swans Store
Warehouses
Tours / Tournaments
Other sites as and when necessary

DEFINITION OF A CHILD

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

AIMS & KEY PRINCIPLES

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

- To safeguard all children and young people who interact with the Club.
- To demonstrate best practice in the area of safeguarding children and young people.
- 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 or young person's welfare is and must always be the paramount consideration.
- All children and young people have a right to be protected from abuse regardless of their gender, race, disability, sexual orientation, religion or belief or age.
- All suspicions and allegations of poor practice or abuse will be taken seriously and responded to efficiently and appropriately.
- To ensure that staff, coaches, parents and other adults who come into contact with children and young people are good role models.
- Working in partnership with other organisations, children and young people and their parents/carers is essential.

The Role of the **Head of Safeguarding** is to: provide effective Club-wide strategic leadership and management with a clear sense of direction and purpose that assists the Club to deliver its safeguarding strategy, vision, values, priorities, policies and aims to promote and protect the welfare of vulnerable groups.

Main duties include but are not limited to:

- Represent and regularly report to the Board on safeguarding policies, procedures and practices within the organisation,
- Report to the Board regularly on organisational safeguarding and Duty of Care matters, including highlighting areas of risk/concern, identifying areas of poor practice/areas for improvement, and providing analysis of numbers and types of safeguarding concerns/disclosure, complaints, and bullying incidents within the organisation
- Ensure that Designated Safeguarding Officers have adequate time and resources to fulfil the requirements of their role as well as access to training relevant to the role
- Ensure that all policies relating to safeguarding and welfare are signed off by the Board annually or when required due to a change in legislation or practice
- Working with others within the organisation to create a positive, child-centred environment
- Play a lead role in developing and establishing the organisation's approach to safeguarding children, young people and adults at risk
- Manage cases of poor practice and abuse reported to the organisation
- Maintain accurate, confidential and up-to-date documentation on all cases of safeguarding and child protection and report where required in line with GDPR
- Manage referrals to children's social-care services, LADO, the police, Premier League, the EFL, the FA and the FAW as and when required
- Central point of contact for internal and external individuals and agencies
- Represent the organisation at external meetings related to safeguarding
- Coordinate the dissemination of policy, procedures and resources throughout the organisation
- Provide advice and support to all staff, volunteers and associates of the organisation in relation to safeguarding concerns and queries. Specifically in regards to the growth of online platforms as reflected under section 124, Keeping Children Safe in Education (KCSIE)
- Advise on the organisation's training needs and the development of its training strategy; provide training where appropriate
- Play a lead role in maintaining and reviewing the organisation's implementation plan for safeguarding and protecting children
- Ensure safeguarding standards are met and maintained
- Keep own knowledge and skills up to date
- Encourage good practice by promoting and championing the safeguarding policy and procedures
- Arranging the Host Family provision for Academy Players.
- Preparation and maintenance of an updated welcome and induction pack for any new Players.
- Developing an emergency contact and support procedure for the Players and their families.
- Development of a pool of trusted providers of relevant professional services and their families.
- Manage the Mental Health and Wellbeing Strategy for Academy Players

The role of the **Player Care Manager (PCM)** is to: develop and manage a high-quality Player Care provision, including the integration process of new Players and their families to the Club, whilst providing ongoing care, assistance and support to current Players. Also, to provide a link with Club Departmental Heads to ensure a professional and co-operative working environment.

Main duties include but are not limited to:

- To develop and implement a Player Care programme for all players across the three phases of the Academy to provide the best possible care, support and development so they can maximise their potential both on and off the pitch.
- Design, develop and implement a player induction process for newly registered players into the Academy as well as supporting existing players who progress through the pathway to ensure they are comfortable within our environment.
- Design, develop and implement a strategy to support player transitions through age groups, phase groups, player release and progression from the Academy.
- To develop and implement a comprehensive Life Skills programme for all players across the three phases of the Academy linking in with specialist staff internally and externally, to ensure individual players develop skills and qualities to make a positive contribution to society.
- To develop, implement and oversee the Academy's Personal Development programme including Individual Development Action Plans.
- Engage with parents/guardians through consistent regular dialogue and support the Head of Education in developing and coordinating age-specific parent workshops across the Academy phases.
- Support the Head of Education to design, develop and implement an education programme for our Host Families.
- Attend (where appropriate) tours and trips, leading on all Player Care and Wellbeing matters pre, during and post trips.
- Seek out opportunities for the Scholars to attend sessions within the community to understand the community in which they work.
- To lead the Parent and Player voice initiatives to ensure that young people and parents have a voice in the Academy.
- Attend weekly operational meetings and phase-specific meetings as well as organise and attend any external meetings organised by the EFL/PL.
- Be the principal point of contact for the EFL/PL and relevant governing bodies for all matters relating to areas within Player Care.
- Supporting the Head of Education and the Academy Safeguarding Officer with safeguarding and promoting the welfare of children in our care across the player pathway.
- Work with the Head of Safeguarding to ensure that the Academy is compliant with EPPP requirements for audit.
- Be a member of the Academy Leadership Team.
- Be a presence across all age groups to make sure that the young players and their parents know whom to speak to with any worries or concerns they may have.
- To act, at all times, in a manner appropriate to a representative of the football club.
- Hold a commitment to equality and diversity in the workplace.

The Role of **Academy Designated Safeguarding Lead** is to: Support the Head of Safeguarding to ensure continued safeguarding compliance, pro-actively promote and raise safeguarding awareness and assist with responding appropriately to safeguarding incidents, concerns and allegations.

Main duties include but are not limited to:

- Work closely with the Head of Safeguarding to ensure the club's compliance with statutory obligations under the relevant legislation and adherence to the rules and regulations surrounding safeguarding as laid down by the relevant governing bodies under which the club is bound.
- Continuously work to maintain, embed and improve the Club's safeguarding provision across the Club ensuring the highest standards for safeguarding vulnerable groups, policies, practices and good practice guidelines
- Support staff to respond appropriately to concerns about the welfare or safety of vulnerable groups
- Utilise the CPOMS online platform and case manage each appropriate report.
- Work closely with the Player Care Team to ensure host families are all assessed in line with statutory regulations and following best practice in their delivery of the service.
- Conduct risk assessment for all extra-curricular activities including trips and tournaments.
- Research, apply and promote diversity initiatives within the Academy.
- Provide advice, guidance and support on equality and diversity matters.
- Facilitate parent workshops providing education and resources for key safeguarding matters.
- Actively promote and implement the safeguarding and equality policy within the Academy environment.
- Produce a monthly report to the Head of Safeguarding regarding all safeguarding concerns and actions.
- Use and keep up to date CPOMS.
- Be a visible, accessible and approachable presence within the Academy environment for all stakeholders.

RECRUITMENT & DISCLOSURE

The Club complies with the safe recruitment procedures as set out in EFL Youth Development Rules Season 2025/2026 and Club's Disclosure and Barring Service Policy. As part of the Club's recruitment and selection process, offers of work for positions which involve working with children and young people in regulated activity are subject to a satisfactory enhanced Disclosure & Barring Service check (DBS). Those being employed in a non-regulated activity role will still be subject to a DBS check at the level deemed suitable for the position offered. The Club is registered with First Advantage (FADV), who provide an online platform for completing disclosure checks.

Two appropriate references will also be obtained from the three provided by the individual.

Those shortlisted will be advised that the Club may conduct an online search as part of due diligence. This search will help the Club identify any incidents or issues that may have occurred, and are publicly available online, which it may want to explore with the applicant at interview.

All offers of work are subject to a satisfactory outcome of the screening process and until such time as a satisfactory disclosure has been confirmed, the individual concerned will not be permitted to commence work. Supervision arrangements, pending the results of checks, are only suitable for non-regulated activity roles.

(Employers must ensure that those engaged in Regulated Activity are not barred from doing so prior to offering an applicant the role).

All employees, workers, and volunteers in a position of trust will be required to undergo regular DBS disclosure clearances, normally every 3 years or earlier if requested. Should an individual's DBS disclosure reveal any relevant criminal history the Club will consider whether the nature of the offence/offences renders the person concerned unsuitable for working with children and young people. In such circumstances, when the nature of any disclosure has to be considered, a risk assessment will be carried out to assess the information contained within the disclosure certificate. The individual may also be asked to attend an interview prior to a recruitment decision being made. A final decision as to whether or not that individual works with or continues to work with the Club will be in accordance with the Club's DBS Policy.

All new employees, workers and volunteers working with children or young people at the Club will be required to complete a self-declaration on commencement of duties.

TEMPORARY STAFF AND CONSULTANTS

The Club will ensure that all agency staff and consultants working with children sign a self-declaration form, where appropriate, prior to engagement. They will not have unsupervised access to children and young people during their time with the Club.

STAFF TRAINING

All staff working in direct contact with children and/or young people shall be required to attend an Induction Presentation when commencing their role at the Club as well as

completing the relevant degree of Safeguarding training. The level and depth of such training is dependent on the level of contact with children their job role requires.

Training courses staff will undertake include but are not limited to; The FA/FAW Safeguarding Children in Football Workshop. After 2 years staff will be required to undertake the EFL Safeguarding Refresher Training. Other more specialised courses may also be identified and included as part of the Club's approach, such as knowledge tests to raise the safeguarding awareness levels and best practice.

Details of those satisfactorily completing these courses are retained by the Head of Safeguarding.

RESPONSIBILITY OF SAFEGUARDING CHILDREN – POSITION OF TRUST AND DUTY OF CARE

The Club 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 employees, workers, consultants, agency staff and volunteers 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 employees, workers, consultants, agency staff and volunteers must be fully aware of this Safeguarding Children Policy and Procedures and their responsibilities. All staff have a duty of care to keep children and young people safe; this can be exercised through the development of respectful, caring and professional relationships. Staff must demonstrate integrity, maturity and good judgement whilst working with children and young people.

Any person whether solely or jointly, who is in a coaching, training, supervising or instructing role* with a young person aged 16-17 that is taking part in Club 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 Police, Crime, Sentencing and Courts Act 2022 came into force on 28 April 2022 and widened the definition of persons being in a "position of trust" to include sports coaches and faith leaders, who would now commit a criminal offence for engaging in any sexual relationship with a person who was 16 or 17 years old.

Section 22A of the Sexual Offences Act 2003 (as amended), 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).

In simpler terms, the new legislation defines these further positions of trust by reference to the activity which the adult is carrying out in relation to the child, as opposed to the role they hold. This covers things such as coaching, teaching, training, supervising or instructing in a sport.

It is also a requirement that the adult carries out the activity "on a regular basis", to avoid an approach that is too broad and includes someone who only occasionally helps with a coaching session. A knowledge requirement must also be met: the adult must be made aware that they carry out a certain activity on a regular basis in relation to the child.

The new Act helps to provide additional safeguards for young people. However, it may take time to fully interpret the meaning of the provisions around the issue of knowledge and as to what is considered to be “on a regular basis”

It is important to remember that the law remains clear that it is a crime for anyone to engage in sexual activity with someone under the age of 16, whether or not they consent to that activity

If a staff member is suspected to be in breach of their position of trust, they will be reported to the Local Authority Designated Safeguarding Officer (in accordance with the Wales Safeguarding Procedures), police and subject to the Club's disciplinary procedures.

* Examples of positions of trust include (*but are not limited to*);

A Head of a Department, member of Academy staff or volunteer working with children, a football coach, a team manager, a physiotherapist, a scout, a driver, a learning mentor/tutor, as well as staff engaged in match day activities involving children and young people, including supervising mascots, stewards, hosts/hostesses, catering personnel and photographers.

PROTECTING CHILDREN & YOUNG PEOPLE WITH DISABILITIES & ADDITIONAL VULNERABILITIES

Children or young people with disabilities or additional vulnerabilities gain enormous benefit from participating in sport. For many years children and young people with disabilities or additional vulnerabilities were not considered to be vulnerable to abuse. It is now known, through research, that this is not the case, and they are at an increased risk of abuse and that the greater the disability the greater the risk.

There are a number of factors that contribute to this and these include:

- Lack of friends and peer group to support and protect.
- Intimate/physical care/invasive medical care required. This can make it difficult for the child or young person to know what is an acceptable touch or unacceptable touch.
- Lack of speech or limited communication. This makes it harder to report abuse.
- Multiple carers – making it hard to identify who may be abusing.
- History of being told what to do and not given choices.
- Depending on the abuser for a service or basic need.
- Having medical conditions that are used to explain injuries.

Children and young people with disabilities may also be less valued than their peers and poor care may be observed but tolerated by others. This might include such things as not speaking directly to the child or young person; not offering choices; not moving and handling them safely; not respecting their privacy and dignity; not treating them according to their age; allowing physical restraint to occur; or using derogatory language.

There is no one way to ensure that children and young people with disabilities or extra vulnerabilities are protected but the safest environments are those that help children and

young people to protect themselves by helping them to speak out. All staff, must do their best to stop abuse from happening and take responsibility for observing, challenging and reporting poor practice and suspected abuse.

Safe environments for children and young people with disabilities are also safer for all children and young people.

A safe environment is one where:

- The possibilities of abuse are openly acknowledged and discussed by adults.
- Training in awareness takes place.
- Policies and Procedures are known by all and followed.
- There is support for those who report suspicions or concerns.
- Children and young people can train in a supportive environment, free from all forms of harassment and abuse.

In addition, safe environments:

- Ensure that those working with children and young people learn the child or young person's communication method. They may need help to do this.
- Ensure that the child or young person's health needs are known, recorded and that sufficient people know how to respond. This may mean knowing how to manage a seizure or an asthma attack. It may mean ensuring that medication is kept to hand, administered correctly, and recorded.
- Ensure a mobile phone is available and switched on.
- Discuss with parents or carers any physical care that is required and how this can best be done with respect and dignity. This will usually mean same gender carers, and consistent carers or supporters.
- Consideration needs to be given to the balance of the need for privacy with the need for accountability and protection against allegations for carers. This is best done by consulting with parents or carers and the child or young person concerned.
- Give the child or young person every opportunity to make informed choices and respect their choice.
- Have clear strategies for dealing with difficult behaviour that excludes any kind of physical punishment or restraint.
- Listen to and advocate for children and young people.
- Involve children or young people and their families wherever possible in the Club's provision for the activities in which they participate. This helps give all children and young people a voice and may act to deter abusers.

GOOD PRACTICE

All employees, workers, consultants, agency staff and volunteers working with children or young people should adhere to the following principles and action (*list is not exhaustive*):

- Be a role model, displaying consistently high standard of behaviour and appearance (*disciplined/committed/time keeping*).
- 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 sporting activity fun and enjoyable: promote fairness, confront and deal with bullying.

- Treat all children and young people equally and with respect and dignity.
- Always put the welfare of the child or young person first.
- Maintain a safe and appropriate distance with children and young people and avoid unnecessary physical contact.
- Where any form of manual/physical support is required it should be provided openly and with the consent of the child or young person. Physical contact can be appropriate so long as it is neither intrusive nor disturbing and the child or young person's consent has been given.
- If groups have to be supervised in changing rooms always ensure coaches etc. work in pairs.
- Request written parental consent if Club officials are required to transport children and young people.
- Gain written parental consent for any significant travel arrangements e.g., tours/overnight stays.
- Coaches are qualified and a qualified first aider is in attendance.
- Ensure that at away events adults should not enter a child or young person's room or invite children and young people to their rooms.
- Always give enthusiastic and constructive feedback rather than negative criticism.
- Secure written parental consent for the Club 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 written record of any incidents or injury that occurs, along with details of action taken and any treatment given.
- All other good practice/common sense principles given the varying situations.
- Take time to understand complex situations and be alert so that you notice when something is wrong.
- Provide support as soon as a problem/issue arises.
- Always respond if you are concerned; never assume someone else has or someone else will.

POOR PRACTICE

The following are regarded as poor practice and should be avoided by all employees, workers, consultants, agency staff and volunteers. Poor practice will be treated seriously, thoroughly investigated, and the appropriate action will be undertaken. (*List is not exhaustive*):

- Unnecessarily spending excessive amounts of time alone with children and young people away from others.
- Being alone in changing rooms, toilet facilities or showers used by children and young people.
- Taking children or young people in car journeys alone, whatever the duration.
- Taking children or young people to your home where they will be alone with you.
- Sharing a room with a child or young person.
- Engaging in rough, physical or sexually provocative games, including horseplay.
- Allowing or engaging in inappropriate touching of any form.
- Allowing children or young people to use inappropriate language unchallenged.
- Making sexually suggestive comments to a child or young person, even in fun.
- Reducing a child or young person to tears as a form of control.

- Allowing allegations made by a child or young person to go unchallenged, unrecorded or not acted upon.
- Do things of a personal nature that the child or young person can do for themselves.
- Failing to adhere to the Club's Code of Conduct

IF IN DOUBT... DON'T.

Challenging poor practice such as; racism, sexism, discrimination, homophobia, bullying, foul, aggressive or provocative language or any controlling behaviour that upsets children or young people is vital. Never ignore bullying or verbal abuse by parents, coaches, children or young people. Listen to and support the person being targeted. Explain to the bully that this is unacceptable.

Please refer to the Low-Level Concerns Policy where appropriate.

SIGNS, INDICATORS AND FORMS OF POOR PRACTICE AND ABUSE

"Child Abuse" is a term used to describe what happens when a person, or a group of people, harm a child or young person under the age of 18. Abuse and neglect are forms of maltreatment of a child; somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children and young people may be abused in a family, institutional or community setting, by those known to them or, more infrequently by a stranger. They may be abused by a singular adult or child, or a group of adults or children.

There are many types of abuse to be aware of. These are only some that can arise in a football situation;

- Neglect,
- Physical Abuse (also see Appendix 7),
- Sexual Abuse,
- Emotional Abuse,
- Bullying (offline and online).

*Full details of signs and indicators of abuse can be found in **Appendix 1** at the end of this policy.*

WHAT TO DO IF YOU SUSPECT ABUSE OR POOR PRACTICE HAS OCCURRED?

If you are concerned about the welfare of a child or young person or you are concerned about an adult's behaviour towards a child or young person 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 one of the following:

- Head of Safeguarding
- Player Care Manager
- Academy Designated Safeguarding Lead
- Members of the Safeguarding Team

Contact details can be found in Appendix 6.

Once you have reported a concern to a member of the Safeguarding Team and full details have been taken, it will be logged on CPOMS.

TAKING NO ACTION IS NOT AN OPTION

WHAT TO DO IF YOU RECEIVE A SAFEGUARDING DISCLOSURE FROM A CHILD OR YOUNG PERSON

Children or young people who may be vulnerable are likely to disclose abuse to those they trust and how one responds to a disclosure is crucial.

Abuse can occur in any context in any place, whether at home or the workplace, in a care setting or in public. Where many people consider somewhere safe, this is not necessarily the case for a child or young person. The Club must remain a safe place, where children and young people are confident to report a concern that happened outside of a Club activity.

If the child or young person requires medical assistance, this is to be sought immediately.

If the child or young person or another child or young person is in immediate danger, contact the police immediately.

Stage 1

Deal with the disclosure as it happens and ensure that the child or young person's immediate needs are met and that they feel supported. When a disclosure is made, it is most important to understand that you must not investigate the disclosure yourself. The disclosure must always be taken seriously and dealt with according to the guidance in this Policy and Procedures, even if the truth of the disclosure is uncertain. You are not expected to act as a social worker, counsellor, judge, and jury or avenge the abuser; you are however expected to act in the best interest of the child or young person who may be at risk.

You must:

- Put your own feelings aside and listen as if the information is not sensational.
- Allow the child/young person to lead the discussion and to talk freely.

- Listen to what the child/young person is saying. Try not to interrupt them or ask lots of questions. Being asked a lot of questions can feel like an interrogation.
- Let them talk at their own pace. Don't worry if the child/young person stops talking for a while – silences are OK. You don't have to rush in to fill the gaps.
- Accept what the child/young person says without challenge.
- Listen to the child/young person without investigating.
- Allow the child/young person to talk but discourage them from sharing the information with too many other people.
- Provide reassurance that you are taking them seriously.
- Let the child/young person know it is recognised how hard it is for them to tell.
- Reassure them that they are doing the right thing by disclosing.
- Avoid using questions such as "Is there anything else you would like to tell me?"
- Avoid asking leading questions like "Did the coach hit you?"
- Never ask questions that may make the child/young person feel guilty or inadequate.
- If physical abuse has taken place, you may observe visible bruises and marks but do not ask a child/young person to remove or adjust their clothing to observe them.
- Tell the child/young person who you will be contacting e.g., the Player Care Manager, the Head of Safeguarding or Academy Designated Safeguarding Lead, statutory agencies etc. and that you will support them through that process.
- Once you have established that they have been harmed or are at risk of being harmed, do not pursue the conversation any further. This is important to ensure that questions cannot be raised later about possible manipulation of the disclosure.
- Respect the confidentiality of the disclosure and do not share the information with anyone other than those who need to know. Those who need to know are those who have a role to play in protecting child/young person.

You must not:

- Panic or show that you are shocked. It is important to remain calm and in control of your feelings.
- Document or record the conversation while the child/young person is disclosing. This should be done as soon as possible after the child/young person has disclosed to you.
- After the child/young person has disclosed, the conversation must be documented remembering as accurately as you can, the words and phrases used by the child/young person to describe what has happened to them.
- Investigate but do listen and reassure the child/young person that they are doing the right thing by disclosing.
- Give the impression that you might blame the child/young person e.g. Don't ask: "why did you let him?", "what were you doing there anyway?" or "why didn't you tell me before?".
- Press for details by asking questions such as "What did he/she do next? "
- Ask leading questions.
- Pass judgement on what is said but do try to alleviate any fears or guilt which the child/young person may have.
- Make false promises and/or promise confidentiality – it should be explained that the child/young person has done the right thing, who will need to be told and why.
- Approach the alleged abuser yourself.

Do remember, when a child/young person makes a disclosure they may feel:

Guilt: They may blame themselves for the abuse and often feel guilt for telling.

Ashamed: They may feel ashamed about the abuse itself.

Confused: They may be confused about their feelings for the alleged abuser.

Scared: They may be fearful of the repercussions of telling. They may be scared of the alleged abuser.

Be careful about touching (e.g., hugging or cuddling) the child/young person if they have not initiated the contact. They may be upset by physical contact.

Stage 2

As soon as possible, once the immediate comfort and safety of the child/young person is secured, you must inform the Academy Designated Safeguarding Officer, the HoS or member of the Safeguarding Team of the disclosure. This should be done no longer than 2 hours of it coming to your attention (or immediately if the child or young person is in imminent danger). You may make a referral directly to a statutory agency e.g., Local Authority or Police if you are concerned about the child/young person's immediate safety and/or are having difficulty contacting the designated safeguarding person/s, or if the designated safeguarding person is the alleged abuser. Every effort should be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a need-to-know basis only.

Stage 3

You should note down details as soon as possible after the disclosure has been made. What is clearly etched at the time can become blurred after a few hours. It is vital that you make clear and concise notes soon after the disclosure in order to provide a full and detailed record. You must provide this written information to the individual from the Safeguarding Team that you informed. It will then be logged on CPOMS.

Immediate notes should include:

- Date and time.
- Place and context of disclosure or concern.
- Important facts provided, e.g., names of alleged victim and alleged perpetrator (if available), and any injuries.
- Who you are, your role and contact details at the Club.
- Any action taken.
- Current position including any concerns about safety of the alleged victim and any other person.
- How aware of the referral is/are the victim, perpetrator, parents or relatives.

Wherever possible, you must record information as it was told to you using the language of the child/young person rather than your own interpretation of it.

It is important to report factual information rather than assumption or interpretation. You might convey your intuitive thoughts, but these should be recognised as such and should not form part of the record.

What happens next?

It is important that concerns are followed up, and it is everyone's responsibility to ensure that they are. You should be informed by the Head of Safeguarding or Academy Designated Safeguarding Officer what has happened following the report being made.

A disclosure is not the only way that you may be made aware of a problem. Sometimes another adult or even a child may say something about a possible abusive situation.

On occasions you may witness an incident that may cause concern or pick up on things that cause concern or information may be passed to you anonymously by a person or persons who do not want to be directly involved for whatever reason. However, you fall upon the information causing concern, the result should always be the same.

All matters will be fully investigated and appropriate action will be taken. Action may include referral to the Police, Local Authority, Premier League, EFL or The FA Case Management Team as appropriate and if a deemed requirement of the Head of Safeguarding. Any referral to an external agency shall also be reported to the Board of Directors.

REMEMBER THE CHILD'S WELFARE IS OF PARAMOUNT IMPORTANCE.

SAFEGUARDING PROCEDURES

The Club takes any form of safeguarding poor practice or abuse seriously to promote a culture of best practice and accountability.

The Club encourages all employees, workers, consultants, agency staff and volunteers to raise concerns they may have about any safeguarding poor practice or abuse as early as possible to the designated personnel. We will respond appropriately to promote a safer Club.

If you have any questions regarding this section of the Safeguarding Children Policy and Procedures, please contact the Head of Safeguarding or a member of the Safeguarding Team.

Wales Safeguarding Procedures

In line with the Wales Safeguarding Procedures, the Club must make a report to the Local Authority whenever there are concerns about a child under the age of 18 years who:

- Is experiencing or is at risk of abuse, neglect or other kinds of harm;
- and
- Has needs for care and support (whether or not the authority is meeting any of those needs).

If any person has knowledge, concerns or suspicions that a child is suffering, has suffered or is likely to be at risk of harm, it is their responsibility to ensure that the concerns are referred to social services or the police who have statutory duties and powers to make enquiries and intervene when necessary.

PROCEDURE FOR RAISING A SAFEGUARDING CONCERN

How to raise a concern

You do not need to have firm evidence before raising a concern. But we do ask that you explain as fully as you can the information or circumstances that gave rise to your concern.

Step 1

If you have a concern about any form of safeguarding poor practice or abuse, raise it first with the Academy Designated Safeguarding Lead or a member of the Safeguarding Team, who will raise it with the Head of Safeguarding. Once you have reported a concern to a member of the Safeguarding Team and full details have been taken, it will be logged on CPOMS.

Step 2

If you feel unable to raise the matter with the Academy Designated Safeguarding Lead for whatever reason, raise the matter with the Head of Safeguarding.

Step 3

If these channels have been followed and you still have concerns, or if you feel that the matter is so serious that you cannot discuss it with any of the above, please contact:

The Safeguarding Manager at the EFL on 01772 325940

Local Authority:

Kelli Richards

LADO

01792 635175

kelli.richards@swansea.gov.uk

Swansea Single Point of Contact

singlepointofcontact@swansea.gov.uk

01792 635700 (to 5pm)

Emergency Duty Team – 01792 775501 (after 5pm)

Steps will then be taken to fully investigate the matter to decide what appropriate action should be taken.

Any allegation raised against a member of staff must be referred to the Local Authority Designated Officer.

The Club is committed to protecting children and young people and will take action to uphold this commitment.

USE OF PHOTOGRAPHY & FILM IMAGES

The Club acknowledge that celebrating success is a key part of football and many activities are held in the public arena. We welcome photographs and images that celebrate the sport, the values and the vision of the Club.

We understand that image capture can present difficulties, risk and sensitivity in a range of circumstances. During the course of our activities, it is foreseeable that a child's image may be captured by appointed photographers. These images may then be used by the Club staff and contractors in both internal and external news and marketing publications and online via websites and social media.

We believe that children and young people should not be subject of abuse of any kind. We have a responsibility to promote the welfare of all children and young people and to take, share and use images safely. Parents / carers have the right to decide whether their images are taken and how they may be used.

Incidental image capture on matchdays and at events – Large crowds may create further questions with regard to consent. As such on matchdays and at special events there is a reasonable expectation that any person may have their image captured or broadcast, and as such explicit consent is not required. In any situation where children may be subject to incidental image capture, i.e., in the background of a main shot, where practical they should be informed, they may be on camera and have an opportunity to opt out.

Where a person finds their image or that of a child is has been used in these circumstances, we will endeavour to remove it from circulation where it is practical to do so, and there are reasonable grounds. We acknowledged that once published, trying to control an image in the public arena is particularly difficult.

The Club will not be able to control the photos taken by members of the public which are taken in public spaces, such as on pitch activity on matchdays at Swansea.com Stadium.

Consent – Where the Club conducts an activity that may allow for the image capture of a participant, the appropriate consent must be in place prior to the event. Those individual and parents / carers must understand what they are consenting to and why. This consent must provide a genuine choice in order to be valid. Activities arranged in the public arena will mean that non authorised Club staff, such as passing members of the public, would be able to take photos which would be outside of Club control.

Social media – the Club have a published policy on how it uses social media and the importance of engaging with fans. The policy outlines the Club's vision and values and how it will deal with abusive online activity. Any social media concerns involving any vulnerable person, the HoS/ADSL will be informed and the matter recorded and managed through CPOMS.

Parents, other children and other photographers – We acknowledge that in some circumstances; parents, family, friends, or other children may wish to take photos. Each the Club event will have clear rules set prior as to what is acceptable; by default, photographs are not permitted at private or invitation events. Where a member of staff, parent or child has a concern, the event manager must be informed immediately. The use of smart phones and live broadcasting to the internet, the scope for image sharing has increased dramatically and

will continue to do so with advances in technology. Extra vigilance must be taken and applying the policy fairly and firmly.

The Academy – The academy uses recordings, images and live streaming as a legitimate coaching aid and for parents to watch their children. Similarly, images are captured for management purposes, such as ID photos. The academy has a separate image capture policy, which maintains the ethos of this policy and where consent of the parent / carer is essential and is agreed on the signing of a new player and at the commencement of every season.

Further image capture considerations – In general, all people should take these considerations into account:

- Staff should not use their own equipment to take photos
- It is not permitted to take photos of children partially dressed or in changing rooms
- Staff should not take the image of a child should be taken unless the correct permissions are in place beforehand
- Children who are more vulnerable, such as being upset, injury, or ill, must not have their photo taken
- Unless permission is in place beforehand, the full name of the child must not be in any captions, kit or reports, as this may leave the child more vulnerable.
- No images should be taken that are sexually suggestive or provocative
- With advancing technology, it is becoming easier to digitally alter photos, and this must be considered with all photos taken.

Any reports or concerns of inappropriate image capture must be reported on CPOMS and the HoS/ADSL informed as soon as practicable. The Club will work in partnership with other agencies, including the LADO, police, football regulators, and voluntary support agencies to keep our children and young people safe and investigate any accusations.

Image storage – All images, whilst held by the Club, will be securely stored on the Club's IT system, complying with the Data Protection Act 2018, and remains the property of the Club at all times. When footage is passed to parents / carers for training or development, it must not be further distributed, without the express prior consent of the academy manager. Families are made fully aware of this restriction at the point of distribution. Should any person have a legitimate issue arising out of Club images, they may contact the data protection officer, dpo@swanseacity.com

Details can be found in the Club's privacy notices available on the Club website.

SOCIAL NETWORKING GUIDANCE

The Club 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 Club is also aware of the potential safeguarding risks especially to children and young people when using these forms of media.

The Club uses a web filtering service which prevents access to certain websites and raises alerts to 'key' words.

Do not add/invite children or young people you have responsibility for in football as 'friends' within social networking sites such as SnapChat, Instagram, Facebook etc.

Avoid 'one to one' electronic communications. Where you do communicate electronically ensure you send this communication to the parent/carer as well as the child or young person.

GOOD PRACTICE WITH SOCIAL MEDIA

When working with children and young people you should always encourage them to:

- Ensure their privacy settings are set as high as possible;
- To have private profiles on social networking sites including Twitter, Instagram and TikTok;
- Not to indulge in any form of 'Sexting'. By having in their possession or distributing indecent images of a person under 18 on to someone else – young people need to be aware that they could be breaking the law as these are offences under the Sexual Offences Act 2003.
- Ensure they are aware that Apps like SnapChat do not always destroy the image as other users have the ability to capture the images and store or share them;
- To report any inappropriate images or things that concern them to the designated Safeguarding Team;
- To report any cyber bullying, harassment or images and content that may cause offence;
- To behave in a safe and appropriate way online and not put themselves or others at risk.

Online Grooming: this is where an adult (someone over the age of 18) uses the internet and social media to befriend and entrust a child or young person for future sexual abuse, image production or exposure. Children or young people may befriend someone online and that person may use sexual language with the child, send gifts or pretend they are in a relationship with the child.

As with other abuse, the signs and indicators are similar, however with online grooming there are more specific indicators including;

- Children spending an alarming amount of time online in isolation of other family members;
- Children having lots of new gifts not bought by family members;
- Children being picked up by different people;
- Children saying they are dating someone they met online and it is apparent the person is older.
- Children using dating sites.

Cyberbullying: The use of electronic and digital media to scare, harass or intimidate another person.

CHILD SEXUAL EXPLOITATION (CSE)

CSE involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts to serious organised crime from groups or gangs.

What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim.

PREVENT – Preventing Radicalisation/Tackling Extremism

The Government's PREVENT duty came into force on the 1st July 2015 and involves protecting children from the risk of radicalisation. Key Club staff will be trained, informed and able to recognise vulnerability and mitigate the risks. Currently there are a number of factors that can make young people vulnerable to radicalisation and if there are any such concerns about a child or young person a member of the Safeguarding team must be notified immediately.

See Prevent Policy for further information.

RATIOS AND SUPERVISION OF CHILDREN & YOUNG PEOPLE

Any activity undertaken by the Club will always give full consideration to the appropriate number of staff members available depending on the age of the children involved, the degree of risk the activity involves and whether there are any additional vulnerability or disability needs. The lower the age of the participants, the greater the need for supervision.

Regardless of ratios a minimum of two members of staff or delivery partner will always be available to supervise an activity. This ensures that there is at least some form of basic cover in the event of something impacting on the availability of one of the adults during the activity.

TOURS AND TOURNAMENTS

The Club encourages participation in professionally organised tournaments both domestically and abroad for the Academy. The Premier League/EFL tournaments, which are organised to expand the games programme, are fully risk assessed by Premier League/EFL staff and Club staff and players attending adhere to the Tournament Codes of Conduct. Tournaments not organised by the Premier League/EFL will follow similar risk assessment procedures, as set out in EFL Youth Development Rules 2025/2026 Season.

A Tour Leader will be appointed by the Club department for each individual tour, and they will designate roles and responsibilities to other staff members. If necessary, a Pre-Tour Risk Assessment visit will be arranged for each new tournament. The Pre-Tour Risk Assessment covers both Health & Safety and Safeguarding areas and will include modes of transport, accommodation, evacuation procedures, climate conditions, tournament match schedules and food provision.

Tours have full insurance cover and are fully staffed to ensure appropriate supervision arrangements and medical support & equipment are available. A pre-tour presentation is provided for parents/carers so they are fully informed on the whole tour procedure prior to the group travelling.

ACADEMY YOUTH LOANS, TRIALS & WORK EXPERIENCE

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.

The Player will be made aware of the Loan Club's Safeguarding Officer and be advised to report any concerns to them as well as the Club's HoS/ADSL.

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, the players are placed in host family accommodation during their time away from the Club and not in hotel accommodation. To ensure best practice the Club has appointed a team of staff to be responsible for the whole loan player arrangements and will support the player in finding an appropriate loan club, as well as providing regular visits and communication during the loan period.

For players under the age of 18 who are joining the Club on trial, parental consent will be sought prior to the trial taking place, along with a full medical history and injury disclaimer. Where accommodation is required, this will be in a designated host family accommodation or, if the player's parent is also travelling, a local hotel may be used as an alternative. The player will be fully supported by the Player Care Manager during their stay and transportation will also be arranged.

UNDER 18, 21 & FIRST TEAM PROGRESSION

As players progress through the Academy system they may have the opportunity, before their 18th birthday, to train and play with the First team. Obviously, this carries a number of safeguarding concerns, as they will be entering an adult environment and be susceptible to adult behaviours and language. The Club will support the player/s during this transition and their first point of contact for guidance and support will be the First Team Safeguarding Staff. Parents will be included, and consent sought.

See U18 Selected for U21 or First Team Duty Policy

CONFIDENTIALTY & DATA PROTECTION

Employees, workers, consultants, agency staff and volunteers may have access to confidential information about children and young people in order to undertake their responsibilities, and may be given highly sensitive or private information. They should never use confidential or personal information about a child or young person or his/her family for their own or others' advantage.

Confidential information about a child or young person 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 or young person's identity does not need to be disclosed, the information should be used anonymously.

There are some circumstances in which an employee, worker, consultant, agency staff or volunteer 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, worker, consultant, agency staff or volunteer is in any doubt about whether to share information or keep it confidential, they should seek guidance from the Data Protection Officer. Any media or legal enquiries should be referred to the Club Secretary or, in their absence, to their deputy.

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

This means that employees, workers, consultants, agency staff and volunteers;

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

SAFEGUARDING CHILDREN POLICY & PROCEDURES

Appendices

Appendix 1

Signs & Indicators of Abuse.

Appendix 2

Concerns about the behaviour of the organisation's staff member or volunteer

Appendix 3

Concerns about the behaviour of another organisation's staff member or volunteer

Appendix 4

Concerns about children and young people arising outside of sport

Appendix 5

Other applicable Club Policies & relevant Legislation/Regulations.

Appendix 6

Key Safeguarding Contacts

Appendix 7

Physical Punishment

Appendix 8

Online Safety Act 2023

Appendix 1

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. (See – Appendix 7)

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.

Bullying

Behaviour that hurts someone else. It includes name calling, hitting, pushing, spreading rumours, threatening or undermining someone. It also includes nonverbal abuse, emotional abuse, exclusion, constant criticism, hiding or damaging belongings, controlling or manipulating someone, making silent or abusive calls. If the type of bullying discriminates due to a person's race, sexuality or because they have a disability it can be a hate crime. If a person is perceived to be 'different' from others, they could be at greater risk. Actions may include unfair or less favourable treatment, culturally insensitive comments, insults and 'banter'. In football this may be a parent who pushes too hard, a coach who treats some players less favourably, or wants to win at all costs, or a player who intimidates or excludes another. Football has a competitive nature and create or support an environment for a bully if other individual or the club are unaware. The victim is often weaker and less powerful and the outcome painful and distressing.

Cyber bullying

Takes place online, and be done remotely via phone, Apps, social media as well as online. This can include; sending threatening or abusive texts, creating and sharing embarrassing images or videos, trolling, exclusion form online games or friendship groups, online shaming, setting up hate sites, encouraging hate crime, taking part in an abusive poll, creating fake accounts, creating or sending sexual images, (also known as nude and semi-nude photos).

Additional Considerations

Online abuse

This any type of abuse that occurs on the internet, mobile phones, social media, emails, online chats, gaming and live stream sites. Children are at risk from strangers purporting to be another person (usually an adult pretending to be a peer), or child on child abuse. Preventing online abuse is the responsibility of everyone.

Child Sexual Exploitation

As above.

Criminal Exploitation

Children and young people can be manipulated or coerced to become involved with gangs and criminal activities. This is often caused by exploitation and after being pressured or abused, they are then put into dangerous situations. This can involve the trafficking of young for criminal gain and be involved in 'County Lines', drug and criminality across different areas of the country.

County Lines

A term used to describe organised criminal networks involved in moving drugs from one area of the country to another. They are likely to exploit vulnerable people including children and the young to move and store money. Coercion, intimidation, violence, sexual violence and weapons will be used to force the young person to act for them. The young person may believe they are consensual to the exploitation. The exploitation and coercion may not have been in person but through the use of technology.

Child trafficking

Where a child or young person is tricked, forced or persuaded to leave their homes and are moved or transported, where they are forced to work, commit crime, or be 'sold' on. It is a form of modern-day slavery for commercial gain. Children can be trafficked into the UK from abroad, or within the UK.

Domestic Abuse

A child witnessing DA is a form of abuse and can have a serious impact on their mental and physical wellbeing, as well as their behaviour, which can have a long-term impact and can last into adulthood. DA can occur in young people, where both people are over 16 who either; are or have been in an intimate relationship, or if they are from the same family. DA is any incident or pattern of incidents of; controlling, coercive behaviour, threatening behaviour, violence, psychological abuse, physical abuse, sexual abuse, financial control, emotional abuse, or 'honour' based violence.

Female Genital Mutilation

Where a female's genitals are deliberately altered or removed for a nonmedical reason. There are no health benefits for girls or women. It can happen at several stages of a female's life, including at birth, during childhood, as a teenager, before marriage, or during pregnancy. It is illegal in the UK, whether committed here or abroad.

Forced Marriage

Where the marriage is not consented to by one or both spouses. Duress can include physical, psychological, financial and sexual pressure. A forced marriage must not be mistaken with an arranged marriage, where the marriage is entered into freely by both parties, although the families take a leading role in the choice of partner. Honour based violence – are crimes or incidents which are, or may have been, committed to protect or defend the reputation or honour of the family and / or the community. They can include; physical assaults, abduction, or even murder.

Grooming

Where someone builds a relationship, trust and an emotional connection with a child or young person so they can manipulate, exploit and abuse them. Any person at any age can groom another and this can be over a very short time, or indeed over a period of years. Grooming activity may include; offering advice or understanding, buying gift, giving the child attention, using their professional position or reputation, taking the child or young person on trips, or using secrets and intimidation to control children. Once the trust is established, the relationship will be exploited and may include isolating the child from friends and family. The Groomer may also build relationships with family and friends of the victim to make them seem trustworthy, while making it harder for the victim to come forward.

Child on Child abuse

Children and young people can be harmed or taken advantage of by other children. This can involve any type of abuse or coercion between children, whether in person or online, including those in a relationship. This was previously known as 'peer on peer' abuse, but has been amended as there may be an age difference between children or young people.

Hazing

Any ritual, initiation activities or situation, with or without the consent, which recklessly, intentionally or unintentionally endangers the physical or emotional wellbeing of vulnerable groups.

Fabricated or induced illness

A situation is fabricated by the parent / carer whereby the child is presented for medical assessment or care, often persistently and often resulting in medical procedures that are unnecessary. These symptoms and signs will cease when the child is separated from the perpetrator.

Radicalisation and Extremism

As above.

Children with harmful sexual behaviour

Children may be harmed by other children. Up to 30% of child sexual abuse is committed by another person under 18. Many adult sex offenders committed their first offence as a child or young person. Sometimes children can develop sexual behaviour inappropriate for their age. Some children may make clumsy attempts at sexual behaviour that are upsetting for others and they may not understand what is and is not appropriate. It may be that a child has been sexually abused and believes that is normal behaviour when they are in a relationship with another young person. The behaviours are harmful to both children. Without appropriate intervention young people may continue their behaviours into adulthood.

Harmful Sexual Behaviour can be either; contact, such as touching, masturbation, or penetration, or non-contact, such as voyeurism, obscene communication, or exhibitionism. As soon as an incident is reported to a member of staff the matter must be reported on CPOMS and the HoS / ADSL will take the lead on any investigations.

Sharing of nudes and semi-nudes

This was previously known as and commonly referred to as 'Sexting'. Modern use of mobile devices, the internet, social media, private messaging, and on-line game chats are a concerning area for safeguarding, as when a photo or message is posted, the child or young person loses control or ownership of any comment image they have shared. They may have shared the image with a friend (or someone purporting to be a friend, such as an adult abuser), the child will become vulnerable to bullying, blackmail, grooming or abuse.

Please refer to the Youth Produced Sexual Imagery Policy for further information.

Sexual violence and sexual harassment between children

Any unwanted act of a sexual nature is unacceptable. Factors outside of SCAFC may affect the young people in our care. All victims are to be reassured and treated seriously. SCAFC work in partnership with schools, statutory agencies, and the police to ensure safeguarding information protocols are followed. A perpetrator may in fact be a victim of abuse themselves and there may be wider issues involved. Sexual harassment is 'unwanted conduct of a sexual nature', which can occur online or in person. This may link into other abuse, such as; sharing of nude and semi-nude images, sharing unwanted explicit content, 'upskirting', or harmful sexual behaviour. Sexual violence is an unwanted sexual act, which can include a single act of kissing without consent and more serious non-consensual or coercive acts.

Involuntary Celibacy (Incels)

Incels are a sub-culture community of men who forge a sense of identity around their perceived inability to form sexual or romantic relationships. In recent years, there has been a small, but growing, number of violent attacks.

There is some debate as to whether incels should be considered a terrorist movement. The most consistent characteristics, it would be incredibly poor mental health and their feelings of bitterness, frustration, and distain towards women. Incel subculture has been associated with misogyny, extremism, rape culture and expressions and acts of violence.

Teenage relationship abuse

A recent NSPCC survey showed 25% of girls and 18% of boys have experienced physical violence in a relationship. Teen relationship abuse covers more than violence and other types of abuse include; pressuring a partner to have sex, controlling behaviour, or unnecessary jealousy or anger.

Poor Practice

A behaviour that falls short of abuse but is nevertheless unacceptable. It is essential that poor practice is challenged and reported, even where there is a belief the motives of an individual are well meaning. Failure to challenge poor practice can lead to an environment where abuse is more likely to remain unnoticed. Poor practice occurs when the needs of the child is not afforded the necessary priority compromising their welfare. SCAFC use the 'CPOMS' safeguarding case management system and expect all staff to report incidents of poor practice as they fall within the description as outlined in the section 'Low Level Concerns'. Examples of poor practice would include; concerning practices, uncomfortable situations, safety concerns, language used, unnecessary singling out of a child, or indeed any 'nagging doubt'.

Infatuations

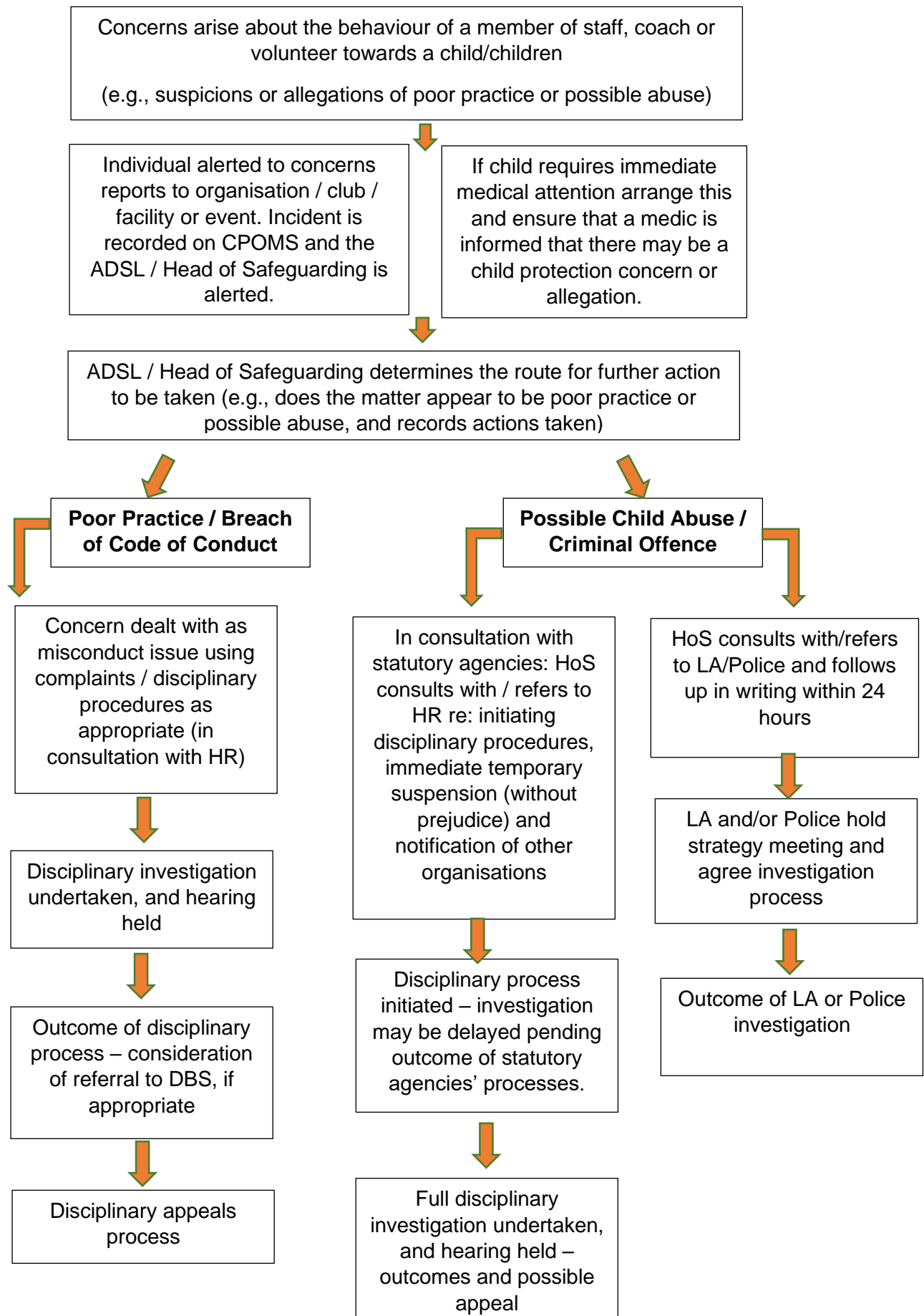
A vulnerable person may develop an infatuation with a member of staff who works with them. Such situations should be handled sensitively. Staff must beware that in such circumstances, there is a high risk that words or actions can be misinterpreted and allegations can be easily made. As soon as a situation is identified by the staff member or a colleague the HoS/ADSL must be informed as the earliest opportunity.

Non-Recent abuse

When a young person, or an adult comes forward as being abused when they were younger. This may have occurred a year ago or many years ago and has been referred to as 'historical abuse'. SCAFC acknowledge there have been cases occur within football and have adopted the 'Sheldon Report' 2021 recommendations. If a report is made to SCAFC, the HoS/ADSL will record the matter and liaise with the police, LA, EFL and The FA, to ensure the matter is investigated in a transparent and thorough matter and the victim is appropriately supported through local and national agencies who are expert in these cases.

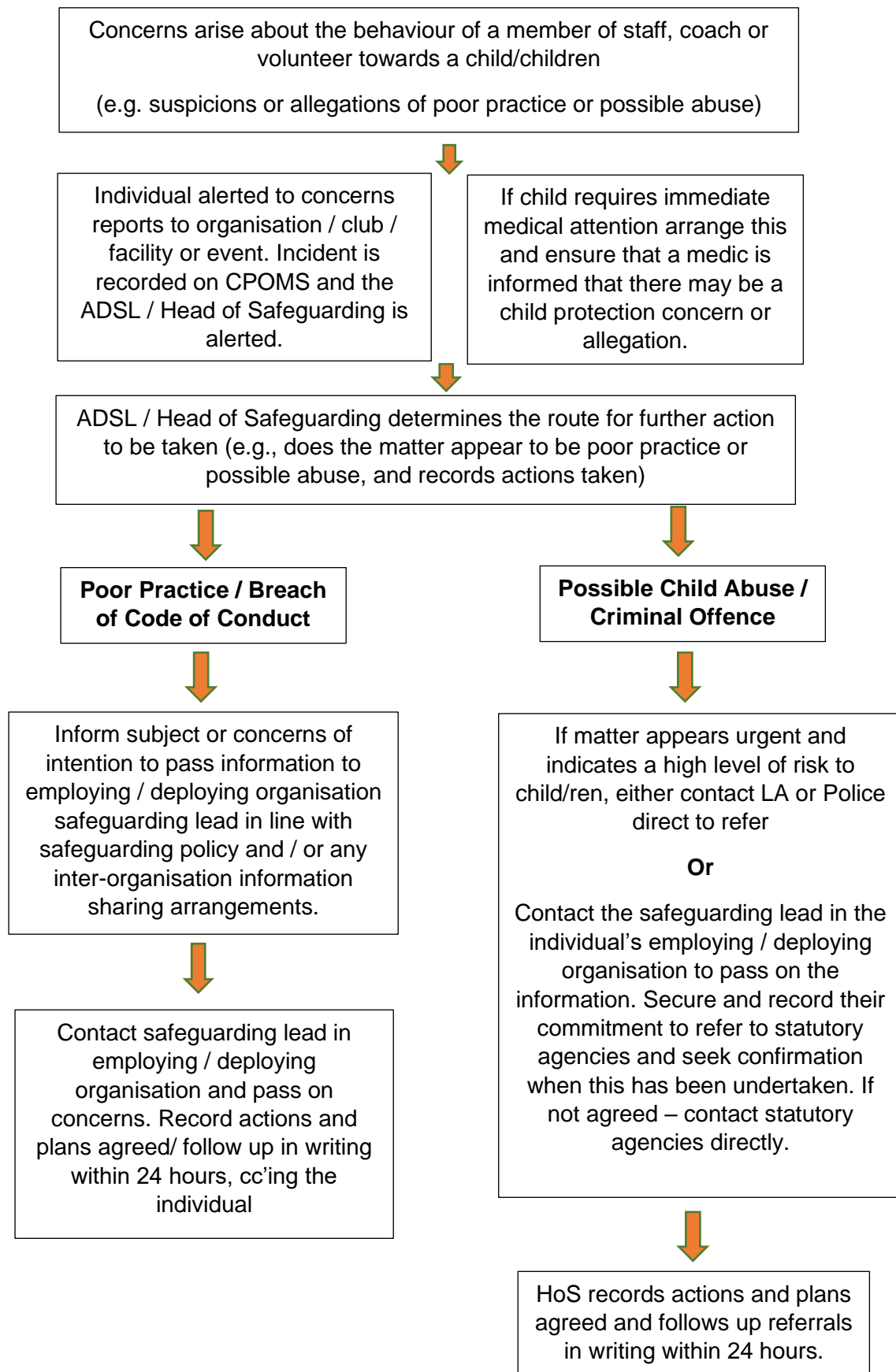
Appendix 2

Concerns about the behaviour of the organisation's staff member or volunteer



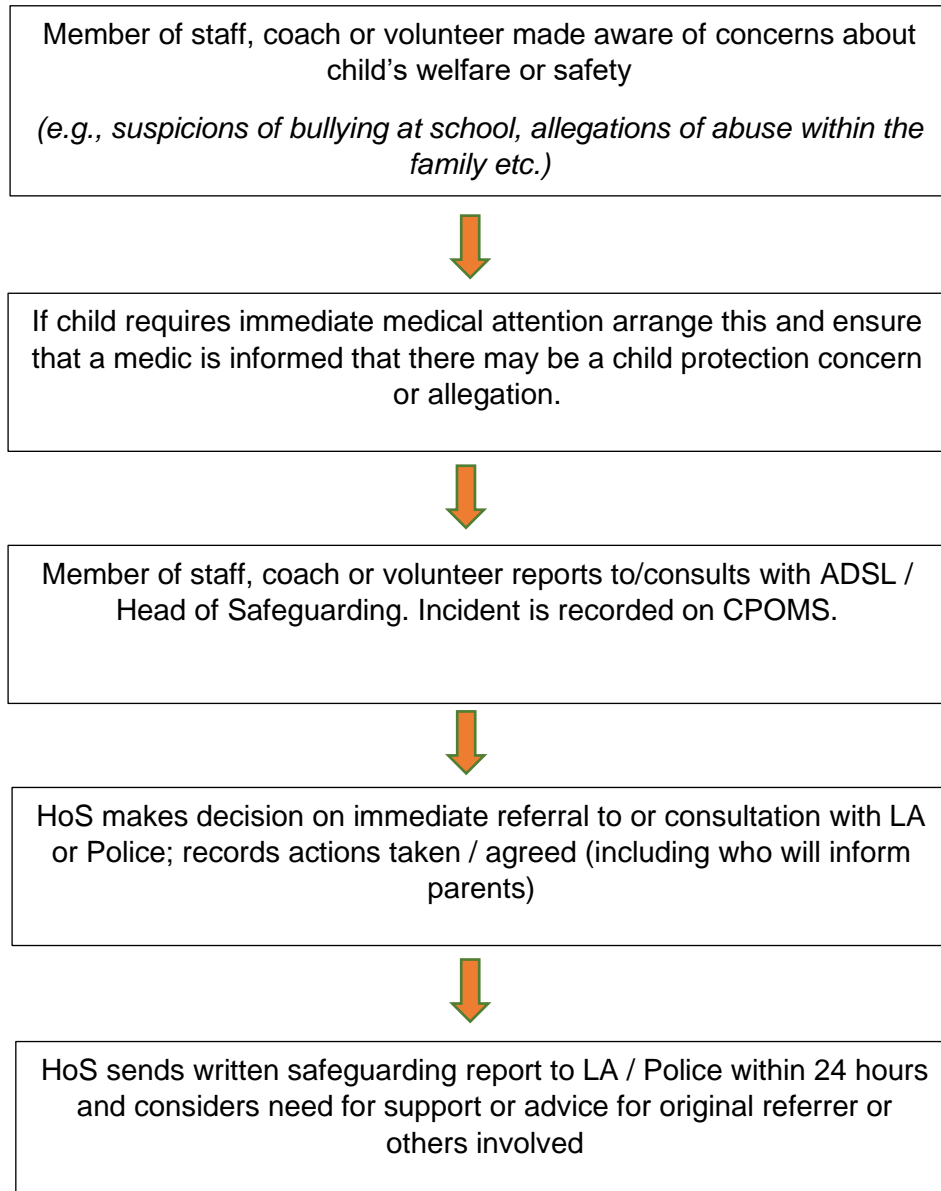
Appendix 3

Concerns about the behaviour of another organisation's staff member or volunteer



Appendix 4

Concerns about children and young people arising outside of sport



Appendix 5

Other Applicable Club Policies*

- Anti-Bullying Policy
- Code of Ethics, Conduct & Behaviour.
- Data Protection Policy.
- Disciplinary Procedure
- Equality & Promoting Diversity Policy.
- Health & Safety Policy.
- DBS Policy and Recruitment of Ex-Offenders Policy
- Social Media Policy
- Information and Communications Policy
- Speak Up Speak Out Policy.

* all are subject to annual review *

Relevant Legislation/Regulations:

- Wales Safeguarding Procedures
- Social Services and Well-being (Wales) Act 2014
- Keeping Children Safe in Education 2024
- United Nations Convention of 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 2015Working Together to Safeguarding People
- Counter Terrorism & Security Act 2015.
- Equality Act 2010.
- Human Rights Act 1998.
- Mental Capacity Act 2005 (revision 2007)
- Protection of Freedoms Act 2012.
- Sexual Offences Act 2003.
- Safeguarding Vulnerable Groups Act 2006.
- Data Protection Act 2018
- General Data Protection Regulation
- Public Interest Disclosure Act 1998
- Serious Crimes Act 2015

Please note that these lists are not exhaustive.

Appendix 6

Key Safeguarding Contacts

Rebeca Storer	Head of Safeguarding	01792 616419 07800 747051	safeguarding@swanseacity.com
Allan Davies	Academy Designated Safeguarding Lead	07773 594470	allandavies@swanseacity.com
Lloyd Griffin	Player Care Manager	07886 276448	lloydgriffin@swanseacity.com
Nicola Butt	HR Manager	01792 616548	nicolabutt@swanseacity.com
Jenna Cooper	Administrative Assistant	01792 616402	jennacooper@swanseacity.com
Rebecca Gigg	Assistant Football Secretary	01792 616401	rebeccagigg@swanseacity.com
Michael Eames	1 st Team Kitman		michaeleames@swanseacity.com
Luke Rees	Academy Receptionist	01792 556500	lukerees@swanseacity.com
Catherine Thomas	Head of Hospitality	01792 616420	catherinethomas@swanseacity.com
Hayley Ford	Head of Supporter Experience	07805 061830	hayleyford@swanseacity.com

Appendix 6 continued

Key Safeguarding Contacts

Emergency Services	101 - non-urgent calls 999 - emergencies
The Premier League Head of Safeguarding	Jess Addicott 020 7864 9173 safeguarding@premierleague.com
The EFL Safeguarding Manager	Alex Richards 01772 325940 safeguarding@efl.com
LADO – Local Authority Designated Officer	Kelli Richards 01792 635175 singlepointofcontact@swansea.gov.uk
Children and Young People Support Unit Emergency Duty Team	01792 637743 01792 775501 (after 5.30pm)
Prevent Contacts	Jane Carter 07979 833660 Jane.carter@south-wales.police.uk Swansea.prevent@swansea.gov.uk
NSPCC	0808 800 5000 (24 hour helpline)
Child Line	0800 1111 www.childline.org.uk
Child Protection in Sport Unit	0116 366 5590 cpsuwales@nspcc.org.uk www.thecpsu.org.uk
E-safety	www.thinkuknow.co.uk www.ceop.police.uk

Appendix 7 – Physical Punishment

Physical punishment is illegal in Wales.

There are lots of types of physical punishment.

It can mean smacking, hitting, slapping and shaking. But there are other types too.

It isn't possible to give a set list of what makes up physical punishment because it can be anything where a child is punished using physical force.

Research suggests that any type of physical punishment could be harmful to children.

Does the law apply to everyone in Wales?

It applies to everyone - parents or anyone who is responsible for a child while the parents are absent.

And as with other laws, it applies to visitors to Wales too.

Physical punishment has been illegal in schools, children's homes, local authority foster care homes and childcare settings for some time.

What happens if people physically punish a child?

Anyone who physically punishes a child:

- will be breaking the law
- risks being arrested or charged with assault
- may get a criminal record which is the same for any criminal offence

Appendix 8 – Online Safety Act 2023

The Online Safety Act 2023 (the Act) is a new set of laws that protects children and adults online. It puts a range of new duties on social media companies and search services, making them more responsible for their users' safety on their platforms. The Act will give providers new duties to implement systems and processes to reduce risks their services are used for illegal activity, and to take down illegal content when it does appear.

The strongest protections in the Act have been designed for children. Platforms will be required to prevent children from accessing harmful and age-inappropriate content and provide parents and children with clear and accessible ways to report problems online when they do arise.

Protecting children is at the heart of the Online Safety Act. Although some content is not illegal, it could be harmful or age-inappropriate for children and platforms need to protect children from it.

Illegal content

The Act requires all companies to take robust action against illegal content and activity. Platforms are now required to implement measures to reduce the risks their services are used for illegal offending. They also need to put in place systems for removing illegal content when it does appear. Search services also have new duties to take steps to reduce the risks users encounter illegal content via their services.

The Act sets out a list of priority offences. These reflect the most serious and prevalent illegal content and activity, against which companies must take proactive measures.

Platforms must also remove any other illegal content where there is an individual victim (actual or intended), where it is flagged to them by users, or where they become aware of it through any other means.

The illegal content duties are not just about removing existing illegal content; they are also about stopping it from appearing at all. Platforms need to think about how they design their sites to reduce the likelihood of them being used for criminal activity in the first place.

The kinds of illegal content and activity that platforms need to protect users from are set out in the Act, and this includes content relating to:

- child sexual abuse
- controlling or coercive behaviour
- extreme sexual violence
- extreme pornography
- fraud
- racially or religiously aggravated public order offences

- inciting violence
- illegal immigration and people smuggling
- promoting or facilitating suicide
- intimate image abuse
- selling illegal drugs or weapons
- sexual exploitation
- Terrorism

Companies with websites in-scope of the Act that are likely to be accessed by children need to take steps to protect children from harmful content and behaviour.

The categories of harmful content that platforms need to protect children from encountering are set out in the Act. Children must be prevented from accessing Primary Priority Content and should be given age-appropriate access to Priority Content. The types of content which fall into these categories are set out below.

Primary Priority Content

- pornography
- content that encourages, promotes, or provides instructions for either:
 - o self-harm
 - o eating disorders or
 - o Suicide

Priority Content

- bullying
- abusive or hateful content
- content which depicts or encourages serious violence or injury
- content which encourages dangerous stunts and challenges; and
- content which encourages the ingestion, inhalation or exposure to harmful substances.

The Online Safety Act will tackle suicide and self-harm content

Any site that allows users to share content or interact with each other is in scope of the Online Safety Act. These laws also require sites to rapidly remove illegal suicide and self-harm content and proactively protect users from content that is illegal under the Suicide Act 1961. The Act has also introduced a new criminal offence for intentionally encouraging or assisting serious self-harm.

Services that are likely to be accessed by children must prevent children of all ages from encountering legal content that encourages, promotes or provides instruction for suicide and self-harm.

Criminal Offences under the Online Safety Act 2023

The criminal offences introduced by the Act came into effect on 31 January 2024. These offences cover:

- encouraging or assisting serious self-harm
- cyberflashing
- sending false information intended to cause non-trivial harm
- threatening communications
- intimate image abuse
- epilepsy trolling

These new offences apply directly to the individuals sending them, and convictions have already been made under the cyberflashing and threatening communications offences.

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded on the CPOMS, including decisions made in responding to them.

Please refer to the Youth Produced Sexual Imagery Policy for further guidance.