

**SWANSEA CITY ASSOCIATION FOOTBALL CLUB LIMITED**

**CLUB SAFEGUARDING POLICY**

**CHILDREN’S SAFEGUARDING POLICY**

**Principles**

**Swansea City AFC 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 Policy and Procedures that the Club will 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 Chairman 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 General Data Protection Regulations.

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.

**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 designated person with responsibility for safeguarding and child protection at the Club is Anthony Avo, Head of Safeguarding.

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)*

Liberty Stadium

Swansea City AFC Academy

Fairwood Training Ground

Development Centres

Host Family Accommodation

**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:**

* Ensure Club compliance with statutory obligations under relevant legislation and the Premier League’s safeguarding Rules by providing robust and evaluative evidence.
* Work closely with and report on a regular basis to the Club senior management lead for safeguarding.
* Work closely with HR and heads of departments to develop and implement safer recruitment and induction practices across the organisation.
* Continuously work to maintain, embed and improve the Club’s safeguarding provision ensuring the highest standards for safeguarding vulnerable groups.
* Manage the development, implementation, promotion and review of the Club’s safeguarding vulnerable group’s policies, practices and good practice guidelines.
* Named lead member of staff to manage safeguarding incidents, concerns and allegations.
* Named lead member of staff to work in partnership with statutory and football authorities, sharing information where appropriate to safeguard vulnerable groups.
* Maintain accurate, confidential and up to date records on all safeguarding incidents, concerns and allegations.
* Give direction and guidance to staff in respect of safeguarding incidents, concerns and allegations.
* Support staff to respond appropriately to concerns about the welfare or safety of vulnerable groups.
* Manage the implementation of the Club’s strategy and action and implementation plan for safeguarding.
* Lead and provide direction to Safeguarding Officers.
* Ensure that Safeguarding Officers are trained, supported and supervised.
* Act as the Club’s lead source of safeguarding support, advice and expertise.
* Development and implementation of safeguarding education specific to individual roles and responsibilities to ensure that staff develop and maintain the necessary skills and knowledge to safeguard vulnerable groups.
* Ensure staff understands their individual responsibilities to safeguard and promote the welfare of vulnerable groups.
* Develop relationships with statutory and football authorities.
* Pro-actively promote and raise safeguarding awareness.
* Promote a safe working environment.
* Attend regular safeguarding training and maintain an up to date knowledge base of relevant legislation, regulations and best practice.
* Provide regular reports to Senior Club Management on the effectiveness of the Club’s Safeguarding strategy.
* Represent the Club as Lead Case Manager when cooperating with/reporting directly to external statutory agencies such as Police, Local Safeguarding Children Board, Children’s Services or Safeguarding Adults at Risk Team.

**The role of the Safeguarding Officer (SO) 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:**

* To work with the Head of Safeguarding to implement and promote the Club’s safeguarding policies and procedures within their department.
* Contribute to maintaining and improving the Club’s safeguarding provision.
* Advise others working with vulnerable groups on the implementation of organisational policies and procedures to safeguard and promote the welfare of vulnerable groups.
* Ensure staff understands their individual responsibilities to safeguard and promote the welfare of vulnerable groups.
* Act as a source of safeguarding support, advice and expertise within their department.
* Support colleagues to respond appropriately to concerns about the welfare or safety of vulnerable groups.
* To give direction and guidance to staff in respect of safeguarding incidents, concerns and allegations and assist the Head of Safeguarding with managing these.
* Assist the Head of Safeguarding to maintain accurate and confidential information.
* Pro-actively promote and raise safeguarding awareness.
* Promote a safe working environment.

**RECRUITMENT & DISCLOSURE** (See DBS Policy for further information)

The Club complies with the safe recruitment procedures as set out in The FA Premier League Rules Season 2016/2017 (in particular Section S, The Safeguarding of Vulnerable Groups and Safe Recruitment) 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. 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. Appropriate references will also be obtained. The Club is registered with The GB Group, who provide an online platform for completing disclosure checks.

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 a degree of Safeguarding training. However, the level and depth of such training is dependent on the level of contact with children their job role requires.

Typically, the training courses staff will undertake will include, but are not limited to; The FA Safeguarding Children in Football Workshop and The Premier League’s Guidance For Safer Working Practice. Other more specialised courses may also be identified and included as part of the Club’s approach to raising 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 the 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 responsible for a child or young person, whether solely or jointly, is in a position of trust which requires behaviour to be in accordance with this policy. Examples of positions of trust (*but are not limited to*) include;

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 activity 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 acceptable and 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 and 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.

**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.

**POOR PRACTICE**

The following are regarded as poor practice and should be avoided by all employees, workers, consultants, agency staff and volunteers (*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 alone in a car on journeys, however short.
* 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.
* Allow or engage 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.
* Allow 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.

**If in doubt….don’t.**

**Challenging poor practice** such as racism, 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.

**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 rarely by a stranger. They may be abused by an adult or adults, or another child/children or young person.

There are five types of abuse to be aware of that can arise in a football situation, they are as follows;

* **Neglect,**
* **Physical Abuse,**
* **Sexual Abuse,**
* **Emotional Abuse,**
* **Bullying.**

*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;

* **Designated Department Safeguarding Officer**.
* **Head of Safeguarding.**
* **Legal Counsel.**

**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.

**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 being interrogated.
* Let them tell you 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 protect 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.
* It is ok to let them know if you are unable to answer all their questions.
* 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. Designated Safeguarding Officer or the Club’s Head of Safeguarding, 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 discloses they are 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 Department Safeguarding Officer or the Head of Safeguarding of the disclosure. You may make a referral yourself directly to a statutory agency 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 complete a more detailed record and incident sheet later.

**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).
* Who you are and 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 Department Safeguarding Officer or the Head of Safeguarding 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 indeed you may pick up on things that cause concern or information may be passed to a coach or manager anonymously by a person or persons who do not want to be directly involved for whatever reason. However you come upon information that causes concern and may put others at risk, the result should always be the same:-

**TAKING NO ACTION IS NOT AN OPTION**

Full contact details can be found in **Appendix 5.**

All matters will be fully investigated and appropriate action will be taken. Action may include referral to the Police, Children Services. Premier League or The FA Case Management Team as appropriate and if seen to be required by the Head of Safeguarding. Any referral to an external agency shall also be reported to the Club’s most senior administrative officer.

**REMEMBER THE CHILD’S WELFARE IS OF PARAMOUNT IMPORTANCE.**

Full details of dealing with concerns in a football setting at **Swansea City AFC Limited** can be found in **Appendix 2** at the end of this policy.

Full details of dealing with concerns outside the football setting can be found in **Appendix 3** at the end of this policy.

**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 encourage 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.

**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 of any form of safeguarding poor practice or abuse, raise it first with the designated department Safeguarding Officer, who will raise it with the Head of Safeguarding.

**Step 2**

If you feel unable to raise the matter with the departmental Safeguarding Officer 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 Head of Safeguarding at the Premier League on Tel: 020 7864 9000.

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

**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 takes its guidance on the use of images from guidelines issued by The FA and Premier League. All images are taken by Club officials who have been briefed by a Club Safeguarding Officer or by a member of the Communications and Marketing Department responsible for the activity being photographed or filmed. Before taking images of children or young people, parental consent is sought in writing at the start of the season or prior to the event.

Parents/Carers are responsible for informing the Club of any change of circumstances within the season which may affect consent.

Parents/Carers will be informed of how the image will be used. The Club will not allow an image to be used for something other than that for which it was initially agreed.

* All children or young people featured in Club 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 Club photographers will, where applicable, undertake a DBS check and attend a 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. Club Identification will be worn at all times.
* Children who are the subject of a court order will not have their images published in any Club document.
* No images of children featured in Club publications will be accompanied by personal details such as their home address.
* Recordings of children for the purposes of legitimate coaching aids are only filmed by Club officials and are stored safely and securely at the Club’s premises.
* Mobile phone cameras are not to be used in changing rooms.
* Any instances of inappropriate images in football should be reported to a Safeguarding Officer.
* The Club does not put young player profiles with images and personal information on its 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.

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 and Instagram;
* 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 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 and also 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 brought by family members;
* Children being picked up by different people (who the family do not know in cars);
* 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.

Social Networking is dealt with in full in the Club’s Social Networking Policy, available on the Club Intranet.

**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 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.

**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 at least 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 Boys Academy, Girls Academy and Development Squads. The Premier League tournaments, which are organised to expand the games programme, are fully risk assessed by Premier League staff and Club staff and players attending, adhere to the Tournament Codes of Conduct. Tournaments not organised by the Premier League, will follow similar risk assessment procedures, as set out in The Premier League Rules 2016/2017 Season (Section S – Appendix 13).

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. A Pre-Tour Risk Assessment visit is arranged for each new tournament. The Pre-Tour Risk Assessment covers both Health & Safety and Safeguarding areas and will include modes of transport, hotel or other 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.

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 then a local hotel may be used as an alternative. The player will be fully supported by the Loan Player Manager during their stay and transportation will be also be arranged.

**UNDER 18, 23 & 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 player liaison staff. Parents will be included and consent sought.

**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 Head of Safeguarding. 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 1998 and the General Data Protection Regulations (GDPR). For further information on the Club’s (and your) obligations under the Data Protection Act 1998 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.

**WHISTLEBLOWING POLICY**

**Scope**

This policy applies to all employees of the Club. The policy does not form part of an individual’s Contract of Employment and may be amended by the Club from time to time in accordance with legislative requirements.

We are committed to conducting our business with honesty and integrity, and we expect all staff to maintain high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do occur.

**Aim**

To encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.

To provide staff with guidance as to how to raise those concerns

To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

This policy takes account of the Whistleblowing Arrangements Code of Practice issued by the British Standards Institute and Public Concern at Work.

**What is whistleblowing?**

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work.

This may include:

* Criminal activity;
* Miscarriages of justice;
* Danger to health and safety;
* Damage to the environment;
* Failure to comply with any legal or professional obligation or regulatory requirements;
* Financial fraud or mismanagement;
* Negligence;
* Breach of our internal policies and procedures including our Code of Conduct;
* Conduct likely to damage our reputation;
* Unauthorised disclosure of confidential information;
* The deliberate concealment of any of the above matters.

A whistleblower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistle blowing concern) you should report it under this policy.

This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases you should use the Grievance Procedure or Anti-harassment and Bullying Policy as appropriate.

If you are uncertain whether something is within the scope of this policy you should seek advice from your Line Manager.

**Raising a whistleblowing concern**

We hope that in many cases you will be able to raise any concerns with your Line Manager.

You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. In some cases they may refer the matter to the Director.

We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

**Confidentiality**

We hope that staff will feel able to voice whistle blowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret.

If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you. We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible.

**External disclosures**

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistle blowing charity, Public Concern at Work, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.

Whistle blowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. The law allows you to raise a concern with a third party, where you reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, we encourage you to report such concerns internally first. You should contact your Line Manager for guidance.

**Investigation and outcome**

Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.

In some cases we may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

We will aim to keep you informed of the progress of the investigation and its likely timescale.

However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential. If we conclude that a whistleblower has made false allegations maliciously, in bad faith or with a view to personal gain, the whistleblower will be subject to disciplinary action.

**If you are not satisfied**

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy you can help us to achieve this.

If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts.

**Protection and support for whistleblowers**

It is understandable that whistleblowers are sometimes worried about possible repercussions.

We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

Staff must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your Line Manager immediately. If the matter is not remedied you should raise it formally using our Grievance Procedure.

Staff must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

**Safeguarding Children Policy & procedures**

**Appendices**

**Appendix 1**

Signs & Indicators of Abuse.

**Appendix 2**

Dealing with concerns in a football setting at Swansea City AFC.

**Appendix 3**

Dealing with concerns outside the football setting.

**Appendix 4**

Other applicable Club Policies & relevant Legislation/Regulations.

**Appendix 5**

Key Safeguarding Contacts

**Safeguarding Children Policy & procedures**

***Appendix 1***

**Signs and Indicators of Abuse**

One of more of the following might trigger concerns about a child:

* A sudden change in behaviour
* Something a child says
* Physical signs of abuse

The signs may vary according to the age and understanding of the child.

|  |  |  |
| --- | --- | --- |
| Category of abuse  | Physical signs | Behavioural signs |
|  |  |  |
| Physical abuse | Physical signs such as unexplained and unusual bruising, finger and strap marks, injuries, cigarette burns, bite marks, fractures, scalds, missing teeth.  | Behavioural signs such as fear of contact, aggression, temper, running away, fear of going home, reluctance to change or uncover body, depression, withdrawal, bullying or abuse of others. |
|  |  |  |
| Neglect | Physical signs such as constant hunger, ill-fitting or inappropriate clothes, weight change, untreated conditions, continual minor Infections, failure to supply hearing aids, glasses and or inhalers. | Behavioural signs such as always being tired, early or late, absent, few friends, regularly left alone, stealing, no money, parent or carer not attending or supportive. |
|  |  |  |
| Sexual abuse | Physical signs such as genital pain, itching, bleeding, bruising, discharge, stomach pains, discomfort, pregnancy, incontinence, urinary infections or STDs, thrush, anal pain on passing motions. | Behavioural signs such as apparent fear of someone, nightmares, running away, sexually explicit knowledge or behaviour, masturbation, bed-wetting, eating problems, substance abuse, unexplained money or gifts, acting out with toys, self-harm. |
|  |  |  |
| Bullying | Physical signs such as weight change, unexplained injuries and bruising, stomach and headaches, bed-wetting, disturbed sleep, hair pulled out. | Behavioural signs such as difficulty making friends, anxiety over school, truancy, withdrawn, anger, moodiness, suicide attempts, reduced performance, money and possessions reported as lost, stealing from within the family, distress and anxiety on reading texts or e-mails.  |
|  |  |  |
| Emotional abuse | Physical signs such as weight change, lack of growth or development, unexplained speech disorders, self-harm, clothing inappropriate for child’s age, gender or culture etc. | Behavioural signs such as unable to play, fear of mistakes, fear of telling parents, withdrawn, unexplained speech and language difficulties, few friends. |

**safeguarding Children Policy & procedures**

***Appendix 2***

**Dealing with concerns in a football setting at Swansea City AFC.**

**Safeguarding Children Policy & procedures**

***Appendix 2 (continued)***

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**Safeguarding Children Policy & procedures**

***Appendix 3***

**Dealing with concerns outside the football setting.**

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**Safeguarding Children Policy & procedures**

***Appendix 4***

**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
* Safeguarding Children Policy.
* Social Media Policy
* Information and Communications Policy
* Whistleblowing Policy.

\* all are subject to annual review

**Relevant Legislation/Regulations:**

* Achieving Best Evidence 2002.
* City of Swansea Inter-Agency Safeguarding Adults Policy & Procedures.
* Care Act 2014.
* Care Standards Act 2000.
* Counter Terrorism & Security Act 2015.
* Equality Act 2010.
* Human Rights Act 1998.
* Mental Capacity Act 2005.
* Protection of Freedoms Act 2012.
* Protection of Vulnerable Adults List 2004.
* Sexual Offences Act 2003.
* Safeguarding Vulnerable Groups Act 2006.
* Data Protection Act 1998
* General Data Protection Regulations

Please note that these lists are not exhaustive.

**Safeguarding Children Policy procedures**

***Appendix 5***

**Key Safeguarding Contacts**

|  |  |
| --- | --- |
| Senior Lead Safeguarding – Huw Jenkins | 01792 616625 |
| Head of Safeguarding – Anthony Avo | 01792 55652107817 369001 |
| Academy Safeguarding Officer – Tony Thomas | 01792 556527 |
| Head of Community – Helen Elton | 01792 556529 |
| Head of Girls COD – Nia Davies | 07951 902254 |
| Development Coordinator – Adam Mahoney | 01792 556526 |
| Legal Counsel / DPO / MDM – Rebeca Storer | 01792 616419 |

**Safeguarding Children Policy procedures**

***Appendix 5 continued***

**Key Safeguarding Contacts**

|  |  |
| --- | --- |
| The Premier League Head of Safeguarding | 020 7864 9173safeguarding@premierleague.com  |
| The FA Child Protection Manager | 0808 800 5000 |
|  |  |
| Emergency Services | 101 - non urgent calls999 - emergencies |
| NSPCC | 0808 800 5000 (24 hour helpline) |
| Child Line  | 0800 1111[www.childline.org.uk](http://www.childline.org.uk)  |
| Child Protection in Sport Unit  | 0116 234 7278cpsu@nspcc.org.uk [www.thecpsu.org.uk](http://www.thecpsu.org.uk)  |
| E-safety  | [www.thinkuknow.co.uk](http://www.thinkuknow.co.uk) [www.ceop.police.uk](http://www.ceop.police.uk)  |