



# Safeguarding Children and Young People Policy and Procedures

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## 1. Introduction and scope

Brentford Football Club (BFC) acknowledges its responsibility to safeguard the welfare of every child and young person who engages with the Club. It is committed to working to provide a safe environment for all.

The key principles of Brentford Football Club's Safeguarding Policy are that:

- The child'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 age, gender, disability, race, sexual orientation, faith or belief.
- All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately.
- A partnership approach working with other organisations, children and young people and their parents/carers is essential to effective safeguarding.

We acknowledge that every child or young person who engages with the Club should be able to take part in an enjoyable and safe environment and be protected from poor practice and abuse. Brentford Football Club recognises that this is the responsibility of all employees, workers, consultants, agency staff and volunteers who encounter children and young people in Club-related activities.

Brentford Football Club has a role to play in safeguarding the welfare of all children and young people by protecting them from physical, sexual or emotional harm and from neglect or bullying. Our staff will be made aware of the policy through staff inductions and our members must make themselves aware of the 'Brentford Football Club Safeguarding Policy and Procedures'. Where appropriate the following guidelines will be supplemented by in-service training and additional guidance.

This Policy and Procedures document is compliant with legislation including but not limited to the Children Acts 1989 and 2004; statutory guidance such as Working Together to Safeguard Children 2018; and governing body rules and regulations including the EFL Rules and FA Regulations. This Policy and Procedures document should be read in conjunction with related Club policies and procedures.

The following locations/departments are under the remit of this policy including:

- Griffin Park
- Brentford FC Club Shop (Braemar Road)
- Brentford FC Training Ground – Jersey Road (1<sup>st</sup> Team and B team)
- Brentford Community Stadium Reservation Centre and Heritage Walk Office
- Stewarding and all other matchday activities
- Travel, events and supporter liaison
- Any other Club activities where members will come in contact with children and young people



## **Brentford FC Community Trust**

Brentford FC Community Sports Trust are not included within this policy, as they are a separate charity and have their own policies and procedures in place. More information about their policies can be found on their website at: <https://www.brentfordfcst.com/> We do, however, reference some of their key safeguarding contacts within this policy, as some of their staff are involved in several Brentford FC activities, so for reference the contact details are listed.

## **2. Key definitions**

Definition of child' or 'children' is used to refer to all children under the age of 18 years (where the context specifically relates to older children, the term 'young person' is used);

*Children Act 1989*

Everyone who comes into contact with children and families has a role to play.

Safeguarding and promoting the welfare of children is defined as:

- Protecting children from maltreatment
- Preventing impairment of children's health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

*(Working Together to Safeguard Children 2018)*

## **3. Safeguarding children - Club roles and responsibilities**

Brentford Football Club has a comprehensive safeguarding structure in place across the Club and its different departments. Below is the list of the various roles and how they fit into the structure. Contact details for each individual are included in this policy in **Appendix 1**.

- Board Member – Safeguarding Champion
- Senior Safeguarding Manager (SSM) – Club
- Designated Safeguarding Officer – Club
- Designated Safeguarding Officer (DSO) – Matchdays x2
- Designated Safeguarding Officer – Training Ground

Each member listed above has been trained in safeguarding and the DSOs are the first point of contact for all Club staff regarding concerns about the welfare of any child or young person. The SSM and DSOs will liaise directly with the County FA (CFA) Welfare Officer and Football League and will be familiar with the procedures for referring any concerns. They will also play a proactive role in increasing awareness of safeguarding best practices.



## Role descriptions

**Safeguarding Champion** – is responsible for making sure safeguarding is a key priority at the Club and at Board level.

**Senior Safeguarding Manager** - is responsible for providing Club-wide strategic leadership that assists the Club to deliver the safeguarding strategy, vision, values, priorities and policies; promoting the welfare of vulnerable groups; and communicating at Director and Heads of Department level.

**Designated Safeguarding Officer (Club)** - is responsible for the strategic and operational direction and embedding safeguarding across the Club they are also lead point of contact should safeguarding concerns arise and the Lead Disclosure Officer.

**Designated Safeguarding Officer (Matchdays and Training Ground)** – are responsible for embedding safeguarding in their own departments and point of contact if concerns arise.

## 4. Safeguarding key processes/areas covered

### Recruitment and disclosure

As part of the Club's recruitment and selection process, offers of work for positions which come into contact with children and young people are subject to a satisfactory self-declaration and a Disclosure and Barring Service (DBS) check as relevant, CV checks, appropriate references, right to work in the UK checks and a qualification check, if applicable. All offers of work are subject to a satisfactory outcome to the rigorous screening process and until such time that all background checks are deemed as acceptable by the Club, the person concerned is not permitted to commence work.

All employees, workers, consultants, agency staff and volunteers in a position of trust are required to undergo regular DBS disclosure clearances, normally every three years or earlier if required.

Should any person's DBS reveal any cautions, convictions, community resolutions, warnings or final reprimands, 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 is carried out to evaluate the information contained within the disclosure certificate. The person may also be required to attend a risk assessment meeting with the Club SSM and department line manager prior to a recruitment decision being made.

All new employees, workers, consultants, agency staff and volunteers working with children and young people at the Club are required to complete a self-declaration on commencement of duties.

When the Club uses suppliers or agencies to undertake its work, they are be subject to rigorous vetting and safeguarding checks and required to adhere to the Club's policy and procedures as set out in their contracts or service level agreements where relevant.

When the Club engages with schools and organisations in connection with children or young people related activities, where appropriate the Club writes to the school or organisation to state the Club's



policy and procedures in relation to DBS checks and safe recruitment. The Club only discloses the name, date of birth, disclosure and issue numbers of the employees, workers, consultants, agency staff or volunteers criminal record checks. Disclosure information in relation to checks will not be divulged. Schools and organisations are required to comply with the Club's safeguarding arrangements as set out in contracts and/or service level agreements.

### **Induction and training**

During the induction process, employees who work with or come into contact with children and young people are required to attend the Club's safeguarding training. Employees also receive a copy of this Policy and Procedures document as well as other Club policies and are required to sign an acknowledgement that they have read and agree to abide by them.

Workers, consultants, agency staff and volunteers who have roles that work with or come into contact with children and young people undertake the Club's safeguarding training. They also receive copies of the Club's Safeguarding Policies and Procedures and are expected to read and abide by them as set out in their employment agreements.

### **Abuse and neglect**

Abuse is defined as a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children or young people may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or another child, children, young person or young people.

There are 4 recognised categories of abuse as defined in Working Together to Safeguard Children 2018:

- Physical abuse
- Sexual abuse
- Emotional abuse (includes bullying)
- Neglect

Full descriptions of each category of abuse and neglect can be found in Appendix 2.

Children and young people may be at additional risk of abuse and neglect through some of the additional vulnerabilities they may face.

### **Additional vulnerabilities**

If children and young people have additional vulnerabilities when engaging with the Club, further safeguards may need to be put in place to reduce the potential risk of abuse and neglect.



## **Radicalisation and extremism**

Radicalisation and extremism of children and young people are forms of emotional abuse. HM Government states that the aim of radicalisation is to attract children and young people to a particular extremist ideology. In many cases it is with a view to inspiring or influencing children and young people eventually to become involved with harmful or terrorist activities. Radicalisation can take place through direct personal contact, or indirectly through social media. Extremism is defined as vocal or active opposition to fundamental British values including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

## **Looked after children and young people**

Looked after children (such as those living in foster care) and young people may be especially vulnerable to abuse and neglect for a number of reasons:

- Experienced abuse and neglect previously
- Living with people who are not their immediate family or friends
- Less support networks
- Stigma around being in care

## **Online world**

Although the online world provides many benefits to children and young people, there are also several potential associated risks:

- Inappropriate language or images
- Online grooming
- Cyberbullying
- Sexting

Further information about the online risks is contained in the Club's Safeguarding Social Media Policy and Procedures which can be found on the Club's Breathe HR system.

## **Deaf and disabled children and young people**

The Equality Act (2010) defines a person as disabled if they have a physical or mental impairment which has a substantial and long term (has lasted or is expected to last at least 12 months) adverse effect on one's ability to carry out normal day-to-day activities. This definition includes conditions such as cancer, HIV, mental illness and learning disabilities.



Deaf and disabled children and young people may be vulnerable to abuse for several reasons:

- Increased likelihood of social isolation
- Dependency on others for practical assistance in daily living (including intimate care)
- Impaired capacity to resist, avoid or understand abuse
- Speech and language communication needs may make it difficult to tell others what is happening
- Limited access to someone to disclose to
- Particular vulnerability to bullying

Children and young people with disabilities may also feel 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 single route to ensure that children and young people are protected, especially those with additional vulnerabilities. However, the safest environments are those that help children and young people to protect themselves by helping them to speak out and that do their best to stop any abuse and neglect from happening and take responsibility for observing, challenging and reporting any poor practice and suspected abuse and neglect.

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

### **Ratio of adults to children**

Brentford Football Club adopts best practice regulations laid down by the Football Association (FA) in relation to the supervision of Adults to Children. Procedures are in place to fully risk assess the types of activity and participant ability to ensure appropriate ratio of staff/coaches to participants.

Generally, there should always be a minimum of two adults and an adult to child/young person ratio of:

- 0 – 7 years of age, one adult to every ten children
- 8 – 17 years of age, one adult to every sixteen children/young people

Particular activities may require more or less adult to child/young person ratios due to:

- Age, needs and ability of children and young people
- Nature of the activity and environment
- Risk assessments or intelligence information identifying potential behavioural or other issues
- Expertise and experience of the staff involved
- Mixed gender children and young people activities will require adults of both genders to supervise where possible



Should the ratio not be suitable, the Club's Safeguarding and Health and Safety Managers will decide whether the activity or event takes place.

### **Use of photography and film**

All images are taken by Club photographers/staff who have been briefed by a Club Departmental Safeguarding Officer (DSO) or by a member of the Communications Department responsible for the activity being photographed or filmed in an appropriate way and manner. Where appropriate and possible, parent/carer consent is sought in writing at the start of the season or prior to an event. The Club adheres to the following principles that are included in the Photography/Image consent Policy which can be found on the Club's Breathe HR system.

- All children or young people featured in Club publications are appropriately dressed
- Where possible, the image will focus on the activity taking place and not a specific child or young person
- 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 the Club's Safeguarding. Club identification is worn at all times
- Children or young people who are the subject of a court order will not have their images published in any Club document
- No images of children or young people featured in Club publications are accompanied by personal details such as their home address
- Recordings of children and young people for the purposes of legitimate coaching aids are only filmed by Club officials and are stored safely and securely at the Club's premises;
- Any instances of inappropriate images in football should be reported to a DSO or the Club's Safeguarding Team
- The Club does not put young players under the age of 16 profiles, images and personal information on its website



## Sexting

There is no accepted definition of 'sexting' but most professionals agree that it refers to the sending or posting of sexually suggestive images, including nude or semi-nude photographs of a person under 18 years of age, via mobiles or over the internet. The UK Council for Child Internet Safety defines sexting as the production and/or sharing of sexual photos and videos of and by young people who are under the age of 18. It includes nude or nearly nude images and/or sexual acts. It is also referred to as 'youth produced sexual imagery'.

'Sexting' does not include the sharing of sexual photos and videos of under-18 year olds with or by adults. This is a form of child sexual abuse and must be referred to the police.

Guidance for staff and volunteers dealing with sexting incident/disclosure:

- The incident should be referred to the DSO immediately and the DSO will clarify the concerns with any staff involved in reporting and ensure concerns are accurately recorded
- Never view, download or share the imagery yourself, or ask a child to share or download – this is illegal
- If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSO
- Do not delete the imagery or ask the young person to delete it
- Do not ask the young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSO
- Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers
- Do not say or do anything to blame or shame any young people involved
- Do explain to them that you need to report it and reassure them that they will receive support and help from the DSO
- If there is a concern a young person has been caused distress, harmed or is at risk of harm a referral will be made to the police immediately. The police do not seek to criminalise young people but take sexting very seriously and will take appropriate action which may include seizure of devices and speaking to the young people involved. On-line abuse through sexting can have very serious consequences and undertaking an investigation at Club level can lead to images and evidence being deleted which prevents appropriate action being taken to support and/or educate those involved or impacted by these issues. Parents will be informed at an early stage and involved in the process unless the police advise against this or there is good reason to believe that involving parents would put the young person at risk of harm.



### **Searching children and young people**

To ensure the safety and security for all Club activities all children and young people may be subject to the Club's search process. Children and young people are asked to self-search as the preferred method; however, should the Club suspect that the child or young person may be concealing a prohibited item, consent will be sought from their parent/carer before a Steward or Security member of the same sex who is being observed by a Supervisor searches the child.

### **Lost or missing children and young people**

During Club activities every effort is made to ensure children and young people remain with their parents/carers or the activity leaders. Should a child or young person become lost or go missing during a Club activity every effort will be made to locate the child or young person as quickly as possible. Should a child or young person not be located within a reasonable timeframe, contact will be made with their parents/carers and the police to file a missing child/young person's report.

### **Children and young people who are not picked up on time**

All parents and carers should collect their child or young person on time in line with the instructions given by the Club. Should the child or young person not be collected on time a minimum of two appropriate adults will wait at the venue until the parent or carer arrives. Should the child or young person not be picked up at all, a Club employee or worker will contact the DSO or the Club's Safeguarding Team. Should sufficient time pass, the Club may contact the police and/or children's services to take care of the child or young person until their parent or carer is contacted.

### **Risk assessments**

For all Club activities including, trips, tours, events and activities, thorough risk assessments are completed to identify and minimise potential risks. The Club's Health and Safety Policy outlines the process to undertake when completing risk assessments as well as how to capture information regarding accidents and incidents and how the Club learns from such matters.

Where a child or young person is involved in a trip, activity or event, a risk assessment must take account of their particular vulnerabilities whilst in the Club's care. The risk assessment will set out what arrangements are in place for their care and supervision and how risks will be minimised.

Activity leaders will be required to continually monitor and amend the controls within the risk assessments whilst leading such activities.



## **Working with external partners**

The Club always ensures that external partners and organisations we engage, will promote the safety and welfare of children and young people and this is outlined in contracts and/or service level agreements. External partners and organisations are required to demonstrate competencies in safeguarding and the Club assesses this through its own safeguarding audits. Where organisations do not have their own satisfactory safeguarding arrangements, they will be expected to comply with the Club's standards.

## **Referrals**

If the Club has safeguarding concerns in relation to a child, young person or their parents/carers the Club may refer these concerns to external agencies. External agencies include, but are not limited to children's social care, adult social care, the police, health agencies, the FA and the English Football League.

## **Confidentiality**

Every effort should be made to ensure that confidentiality of safeguarding cases is maintained for all concerned. Information should be handled and disseminated on a need to know basis only which would not normally include anyone other than the following:

- The Safeguarding Team and Senior Safeguarding Manager
- The child or young person or the person raising the concern
- The employee, worker, consultant, agency staff or volunteer who received the concern or disclosure
- The parents/carers of the child or young person who is alleged to have been abused, where appropriate
- Local Authority and Police
- Dependent on role, the National Governing Body

Employees, workers, consultants, agency staff and volunteers may have access to confidential information about children and young people in order to undertake their responsibilities. In some circumstances, employees, workers, consultants, agency staff or volunteers may be given highly sensitive or private information. Confidential or personal information about a child or young person or their family should not be used 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 handled 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, employees, workers, consultants, agency staff and volunteers have a duty to pass



information on without delay, but only to those with designated safeguarding responsibilities (DSO and Safeguarding Team).

If an employee, worker, consultant, agency staff or volunteer is in any doubt about whether to share information or keep it confidential, guidance should be sought from the Club's Safeguarding or Legal Teams. The storing and processing of personal information about children and young people is governed by the Data Protection Act 1998.

## **5. Summary of good practice when working with children and young people**

To ensure all children and young people have the most positive and safe experience when engaging with the Club, all employees, workers, consultants, agency staff and volunteers should adhere to the following principles and action (to ensure they role model positive behaviours and so reduce the risk of allegations, abuse and neglect occurring):

- Listen carefully to children and young people about their needs, wishes, ideas and concerns and take them seriously
- Treat all children and young people equally, not showing favouritism
- Always work in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication with no secrets)
- Make the experience of the activity fun and enjoyable
- Promote fairness, confront and deal with bullying
- 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
- If children and young people have to be supervised in changing rooms always ensure coaches etc. work in pairs
- Request written consent if the Club are required to transport children and young people using the Club's work experience/placement registration form.
- Employees and workers should maintain their qualifications and professional development
- A qualified first aider is in attendance or readily available
- Maintain appropriate professional relationships with children and young people, including only engaging with them online with prior approval and through the Club's social media channels
- On trips, ensure that adults should not enter a child or young person's room unless there is a safety concern, in which case two adults should enter and should not invite children or young people into their rooms
- Be a good role model; this includes not swearing, smoking or drinking alcohol in the company of children and young people
- Always give enthusiastic and constructive feedback rather than negative criticism;
- Promote the Club's vision and values and be an ambassador for those values
- Ensure children and young people adhere to their relevant Code of Conduct



- Secure written consent for the Club to administer emergency first aid or other medical treatment if the need arises
- Reward effort as well as performance
- Challenge unacceptable or inappropriate behaviour
- Encourage children and young people to take responsibility for their own behaviour and performance
- Keep a written record of any incident or injury that occurs, along with details of any treatment given or action taken using the Club's Accident and Incident Report Form
- Record safeguarding concerns on the Safeguarding Incident Form (Appendix 4)

## **6. Procedures for dealing with a safeguarding concern**

### **Consent**

The priority in safeguarding should always be to ensure the safety and welfare of the child or young person. If concerns arise, it is best practice to always gain the consent of the child or young person before an external referral is made. There are a number of circumstances whereby an external referral can be made without consent and these include:

- The child or young person is at risk of harm
- Other people are, or may be, at risk, including other children or young people
- Emergency or life-threatening situations may warrant the sharing of relevant information with the emergency services without consent
- Sharing the information could prevent a serious crime
- The child or young person lacks the mental capacity to make that decision
- A serious crime has been committed
- There is a risk of significant harm and meets the threshold for a multi-agency strategy meeting
- Employees, workers, consultants, agency staff or volunteers are implicated

### **What to do if you suspect abuse or poor practice has occurred?**

If you are concerned about the safety or 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 or young person. Safeguarding children and young people is everyone's responsibility.

It is important that you report your concerns to one of the following:

- Designated Safeguarding Officer;
- Safeguarding Team; or
- Senior Safeguarding Manager

**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 or neglect 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 Procedure, even if the validity 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 without investigating. Try not to interrupt them or ask lots of questions. Being asked a lot of questions can feel like being interrogated
- Allow the child or young person to 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
- 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 and they have done the right thing by disclosing
- Let the child/young person know it is recognised how hard it is for them to tell you
- It is ok to let them know if you are unable to answer all their questions
- Avoid asking leading questions, for example "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 and do not take photographs of the injuries, you should make a note of the injuries in the Safeguarding Incident report form
- Tell the child/young person who you will be contacting e.g. Club's Safeguarding Team or DSO and that you will support them through that process

If you establish that they have been harmed or is 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; and



- 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 children/young people.

**You must not:**

- Panic or show that you are shocked. It is important to remain calm and in control of your feelings
- Document 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 happened to them
- Investigate
- 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 they do next?"
- Ask leading questions
- Pass judgment on what is said
- Make false promises and/or promise confidentiality – it should be explained that the child/young person has done the right thing, outline who will need to be told and why;
- Approach the alleged abuser yourself.

*Do remember, when a child/young person discloses 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 or young person is secured, you must inform your DSO, or the Safeguarding Team 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 complete the Club's Safeguarding Incident Form (SIF) as soon as possible after the disclosure has been made and send the SIF (Appendix 4) to the Safeguarding Team within 24 hours of the disclosure.



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

### **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 Club's Safeguarding Team what has happened following the report being made. If you do not receive this information, you should be proactive in seeking it out.

If you have concerns that the disclosure has not been acted upon appropriately, you should inform the Club's Senior Safeguarding Manager and ultimately contact the relevant statutory agency.

A disclosure is not the only way that you may be made aware of an issue. Sometimes another adult or even a child or young person 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.

### **Raising 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 appropriate Designated Safeguarding Officer, who will raise it with the Club's Safeguarding Team.

#### **Step 2**

If you feel unable to raise the matter with the DSO for whatever reason, raise the matter with the Club's other members of the Safeguarding Team.

#### **Step 3**

If you feel the Safeguarding Team has not handled the concern appropriately you should contact the Club's Senior Safeguarding Manager. 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, you should contact the Head of Safeguarding at the English Football League. Contact Alexandra Richards on 07792 284740.

### **Managing allegations against employees, workers, consultants, agency staff and volunteers**

Should a concern arise about an employee, worker, consultant, agency staff or volunteer's conduct in relation to a child or young person, this should be reported to the Club's Safeguarding Team who will take such steps as considered necessary to ensure the safety of the child or young person in question and any other person who may be at risk. The person raising the concern should complete the Club's Safeguarding Incident Form (Appendix 4). When managing an allegation against an employee, worker, consultant, agency staff or volunteer the Safeguarding Team will follow this process:



- The allegation will be referred to the Local Authority Designated Officer (LADO)/Designated Person at the Local Authority and/or the Police;
- The parent/carer of the child or young person will be contacted as soon as possible, following advice from statutory agencies;
- Senior Management will be notified and if applicable the EFL and the FA;
- If a member of the Safeguarding Team is the subject of an allegation, the report must be made to the Senior Safeguarding Manager who will refer the allegation to the appropriate statutory agencies;
- If required, a full investigation and possible sanction in accordance with the Club's Disciplinary Policy for employees will follow. Workers, consultants or agency workers may have their Agreements terminated;
- Referrals as appropriate will be made to the Disclosure and Barring Service (DBS).

### **Managing concerns for a child or young person**

Any concern relating to the abuse of a child or young person by another child or young person must be dealt with through this Policy and Procedure. Any such concern should be reported immediately to the DSO who will inform the Safeguarding Team.

### **Making a referral**

All employees, workers, consultants, agency staff and volunteers should complete the Club's Safeguarding Incident Form (Appendix 4) after referring any case to the DSO and/or Safeguarding Team. The Safeguarding Team will contact the relevant Local Authority Children's Services Team completing their Referral Form and update the Safeguarding Incident Form for the Club's records.

### **What to do if a child or young person is in danger of immediate harm**

The first priority is to ensure the child or young person is in a safe place away from the alleged perpetrator. Emergency services should be summoned whenever a situation is felt to be beyond the control of employees, casual workers, agency staff, consultants or volunteers. In addition, employees, workers, consultants, agency staff and volunteers should have, readily available, all the contact numbers of the Club's Safeguarding Team, DSOs, colleagues, or other services which can assist in an emergency or urgent situation. Report the matter to the Safeguarding Team and/or Senior Safeguarding Manager at the earliest opportunity.

In the absence of the Safeguarding Team and/or Senior Safeguarding Manager, contact the London Borough of Hounslow Children's Services Team on 020 8583 6600 option 2 and/or the police on 101 for help and to ensure the correct procedure is followed.



## **Whistleblowing**

Brentford Football Club supports The FA's Whistle blowing Policy. Any adult or young person with concerns about a colleague can 'whistle blow' by contacting The FA Safeguarding Team on 0844 980 8200 4787, by writing to The FA Case Manager at The Football Association, Wembley Stadium, PO Box 1966, London SW10 9EQ or alternatively by going direct to the Police, Children's Social Care or the NSPCC.

Brentford Football Club encourages everyone to know about it and utilise it if necessary.

## **7. Support and guidance on safeguarding matters**

Dealing with a disclosure from a player, and safeguarding issues can be stressful. The member of staff/volunteer should, therefore, consider seeking support for themselves and discuss this with their line Manager or HR Manager as appropriate.

### **Criminal Investigations and Social Care Services**

Where serious concerns are raised and/or a criminal offence may have been committed then it is not the responsibility of Club staff to determine if abuse has taken place. This is the responsibility of the police and/or local authority who may involve Club staff in any investigation procedures. Where the police decide that they will not take any further action then the local authority may still proceed with an investigation in conjunction with the Club.

Where both the police and social care services have decided to take no further action then the Club management may undertake an internal investigation in accordance with Club disciplinary procedures.

### **Local Authority Designated Officer (LADO)**

The Safeguarding team will maintain a working relationship with the relevant LADOs (Local Authority personnel who preside over issues relating to adults who work with children) and where necessary, work in partnership in response to concerns, incidents or allegations.

If a member of staff is removed (or resigns) from their role as a result of an allegation or investigation conducted under this policy and the necessary criteria are met, a referral to the Independent Safeguarding Authority will be made in conjunction with the appropriate statutory agencies.

### **Additional Policies, Procedures and Guidelines**

This Policy underpins all the work undertaken across the Club that involves direct (and in some cases indirect) engagement with children and vulnerable adults. Where there are significant areas or levels of engagement, this policy is supplemented by further policies, protocols, guidance and training.



## **8. Key safeguarding contacts and further advice**

### **Hounslow Local Authority Designated Officer (LADO)**

Telephone: 020 8583 5730

Email: [LADO@hounslow.gov.uk](mailto:LADO@hounslow.gov.uk)

### **Children's Social Care – Hounslow**

Telephone: 020 8583 6600 option 2

Out of hours telephone: 020 8583 2222

Email: [earlyhelp@hounslow.gov.uk](mailto:earlyhelp@hounslow.gov.uk) or [childrensocialcare@hounslow.gov.uk](mailto:childrensocialcare@hounslow.gov.uk)

### **Further advice on Safeguarding Children matters can be obtained from:**

Alexandra Richards

English Football League (EFL) Safeguarding Manager

Tel: 07792 284740

Email: [arichards@efl.com](mailto:arichards@efl.com)

Nikeeta Patel

London FA Designated Safeguarding Officer

Telephone: 020 7751 2420

Email: [Safeguarding@LondonFA.com](mailto:Safeguarding@LondonFA.com)

Sharon Porter

Middlesex FA Designated Safeguarding Officer

Telephone: 0208 515 6903 or 07739 980164

Email: [Sharon.porter@middlesexfa.com](mailto:Sharon.porter@middlesexfa.com)

<http://www.thefa.com/football-rules-governance/safeguarding>

Emailing – [footballsafesafe@TheFA.com](mailto:footballsafesafe@TheFA.com)

The FA Safeguarding Children general enquiry line 0845 210 8080



## 9. Revisions to the Safeguarding Children Policy and Procedures

### Implementation, Monitoring and Review of the Safeguarding Children Policy and Procedures

The policy will be reviewed annually by the Safeguarding Team. It will be implemented through the Club's induction and training programme, and as part of day to day practice.

The Safeguarding Team carries out internal monitoring checks on a regular basis to ensure safeguarding and child protection procedures are in line with the policy.

Date	Name	Description
July 2016	Allan Steele	Adaption of policy wording
October 2019	Jon Burr	Fully updated



## Appendix 1 – Club safeguarding key contacts

The Club	Role	Email	Telephone
<b>Sally Stephens</b>	Fan and Community Relations Director/Senior Safeguarding Manager	<a href="mailto:sstephens@brentfordfc.com">sstephens@brentfordfc.com</a>	07850 644259
<b>Allan Steele</b>	B Team Technical Lead /Training Ground DSO	<a href="mailto:astele@brentfordfc.com">astele@brentfordfc.com</a>	07763 861395
<b>Dave Gregg</b>	Match Day Operations Assistant, Match Day DSO	<a href="mailto:dgregg@brentfordfc.com">dgregg@brentfordfc.com</a>	07719 918695
<b>Barney McGhee</b>	Safety and Security Manager, Match Day DSO	<a href="mailto:bmcghee@brentfordfc.com">bmcghee@brentfordfc.com</a>	07471 036390
<b>Jon Burr</b>	Diversity and Inclusion Manager, Club DSO	<a href="mailto:jburr@brentfordfc.com">jburr@brentfordfc.com</a>	07975 856451
The Trust	Role	Email	Telephone
<b>Amy Crook</b>	Office Manager & Match Day Coordinator, Trust DSO	<a href="mailto:acrook@brentfordfcst.com">acrook@brentfordfcst.com</a>	
<b>Martin Bradshaw</b>	Coach Deployment Officer, Deputy DSO	<a href="mailto:mbradshaw@brentfordfcst.com">mbradshaw@brentfordfcst.com</a>	07545 485770
<b>Luke Skelhorn</b>	General Manager, Senior Safeguarding Manager	<a href="mailto:lskelhorn@brentfordfcst.com">lskelhorn@brentfordfcst.com</a>	07977 508855

Other			
	<b>The PFA</b>	<a href="mailto:wellbeing@thepfa.co.uk">wellbeing@thepfa.co.uk</a>	07500 000 777
	<b>The FA</b>	<a href="mailto:safeguarding@thefa.com">safeguarding@thefa.com</a>	0808 800 5000 or text 88858
	<b>NSPCC</b>	<a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>	

The FA has commissioned a dedicated NSPCC helpline for adults who were victims of sexual abuse in childhood within the football industry. NSPCC Victims helpline will be available 24 hours a day on 0800 023 2642

**What:** Safeguarding is everyone’s responsibility. If you are worried about a child or Adult at risk, it is important that you report your concerns – no action is not an option

**Where:** All policies and procedures, including reporting forms are available on BreatheHR and available from any relevant DSO

**When:** Immediately

## Appendix 2 – Categories of abuse

Physical abuse	A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child or young person. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child or young person.
Sexual abuse	Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child or young person is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children or young people in looking at, or in the production of, sexual images, watching sexual activities, encouraging children or young people to behave in sexually inappropriate ways, or grooming a child or young person in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children or young people.
Emotional abuse (including bullying)	The persistent emotional maltreatment of a child or young person such as to cause severe and persistent adverse effects on the child or young person’s emotional development. It may involve conveying to a child or young person that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child or young person opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children or young people. These may include interactions that are beyond a child or young person’s developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child or young person participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children or young people frequently to feel frightened or in danger, or the exploitation or corruption of children or young people. Some level of emotional abuse is involved in all types of maltreatment of a child or young person, though it may occur alone
Neglect	<p>The persistent failure to meet a child or young person’s basic physical and/or psychological need, likely to result in the serious impairment of the child or young person’s health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:</p> <ul style="list-style-type: none"> <li>• Provide adequate food, clothing and shelter (including exclusion from home or abandonment);</li> <li>• Protect a child or young person from physical and emotional harm or danger;</li> <li>• Ensure adequate supervision (including the use of inadequate care-givers); or</li> <li>• Ensure access to appropriate medical care or treatment.</li> </ul> <p>It may also include neglect of, or unresponsiveness to a child or young person’s basic emotional needs</p>

## Physical and behavioural signs of abuse

Category of abuse and neglect	Physical Signs	Behavioural Signs
Physical abuse	Unexplained and unusual bruising, finger and strap marks, injuries, cigarette burns, bite marks, fractures, scalds, missing teeth	Fear of contact, aggression, temper, running away, fear of going home, reluctance to change or uncover body, depression, withdrawal, bullying or abuse of others
Sexual Abuse	Genital pain, itching, bleeding, bruising, discharge, stomach pains, discomfort, pregnancy, incontinence, urinary infections or STIs, thrush, anal pain on passing motions	Apparent fear of a person, nightmares, running away, sexually explicit knowledge or behaviour beyond their years, masturbation, bed-wetting, eating problems, substance abuse, unexplained money or gifts, acting out with toys, self-harm
Emotional Abuse	Weight change, lack of growth or development, unexplained speech disorders, self-harm, clothing inappropriate for child's age, gender or culture etc.	Unable to play, fear of mistakes, fear of telling parents, withdrawn, unexplained speech and language difficulties, few friends
Bullying	Weight change, unexplained injuries and bruising, stomach pains and headaches, bed-wetting, disturbed sleep, hair pulled out	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
Neglect	Constant hunger, ill-fitting or inappropriate clothes, weight change, untreated conditions, continual minor infections, failure to supply hearing aids, glasses and or inhalers (where appropriate)	Always being tired, early or late, absent, few friends, regularly left alone, stealing, no money, parent or carer not attending or supportive



### Appendix 3 – Other policies and relevant legislation

Other applicable Club Policies and procedures:

Anti-Bullying Policy	Safeguarding Adults at Risk Policy
Data Handling and Protection Policy	Safeguarding Children and Young People Policy
Disciplinary Policy	Safeguarding Social Media Policy
Equal Opportunities Policy	Transport Policy
Grievance Policy	Trips, Tours and Tournaments Policy
Health and Safety Policy	Whistleblowing Policy
Club photography/image consent policy	Recruitment Policy (and Safer Recruitment Guidance)

Relevant legislation, guidance and regulations:

Adoption and Children Act 2002	HM Government Working Together to Safeguard Children 2018
Children Act 1989	Human Rights Act 1998
Children Act 2004	Keeping Children Safe in Education (KCSIE) 2018
Children and Families Act 2014	Modern Slavery Act 2015
Counterterrorism and Security Act 2015	Police Act 1997
General Data Protection Regulation	Protection of Children Act 1999
Equality Act 2010	Protection of Freedoms Act 2012
FA Respect Codes of Conduct	Rehabilitation of Offenders Act 1974
FA Safeguarding Children Guidance	Safeguarding Vulnerable Groups Act 2006
Female Genital Mutilation Act 2003	Sexual Offences Act 2003
Forced Marriage Act 2008	HM Government Information Sharing Guidance for Practitioners 2015



## Appendix 4 – Safeguarding Incident Form

### Safeguarding incident reporting form

Your name:	Name of organisation: Brentford Football Club
Your role:	
Contact information (you):	
<i>Address:</i>	<i>Postcode:</i>
<i>Telephone numbers:</i>	<i>Email address:</i>
Child/Vulnerable Adult name:	Child/Vulnerable Adult date of birth:
Child/Vulnerable Adult ethnic origin: <i>Please state</i>	Does Child/Vulnerable Adult have a disability: <i>Please state</i>
Child/Vulnerable Adult gender:	
<input type="checkbox"/> Male <input type="checkbox"/> Female	
Parent's / carer's name(s):	
Contact information (parents/carers):	
<i>Address:</i>	<i>Postcode:</i>
<i>Telephone numbers:</i>	<i>Email address:</i>
Have parent's / carer's been notify of this incident?	
<input type="checkbox"/> Yes <input type="checkbox"/> No If YES please provide details of what was said/action agreed:	
Are you reporting your own concerns or responding to concerns raised by someone else:	
<input type="checkbox"/> Responding to my own concerns <input type="checkbox"/> Responding to concerns raised by someone else	
If responding to concerns raised by someone else: <i>Please provide further information below</i>	



<p><i>Name:</i></p> <p><i>Position in relationship to the Child/Vulnerable Adult:</i></p> <p><i>Telephone numbers:</i> _____ <i>Email address:</i> _____</p>	
<p>Date and times of incident:</p>	
<p>Details of the incident or concerns:</p> <p><i>Include other relevant information, such as description of any injuries and whether you are recording this incident as fact, opinion or hearsay.</i></p>	
<p>Child/Vulnerable Adult account of the incident:</p>	
<p>Please provide any witness accounts of the incident:</p>	



Please provide details of any witnesses to the incident:	
<i>Name:</i>	
<i>Position within the Club or relationship to the Child/Vulnerable Adult</i>	
<i>Date of birth (if child):</i>	
<i>Address:</i>	<i>Postcode:</i>
<i>Telephone number:</i>	<i>Email address:</i>
Please provide details of any person involved in this incident or alleged to have caused the incident/injury:	
<i>Name:</i>	
<i>Position within the Club or relationship to the Child/Vulnerable Adult</i>	
<i>Date of birth (if child):</i>	
<i>Address:</i>	<i>Postcode:</i>
<i>Telephone number:</i>	<i>Email address:</i>
Please provide details of action taken to date:	
Has the incident been reported to any external agencies?	
<input type="checkbox"/> Yes	
<input type="checkbox"/> No	
If YES please provide further details:	



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<p><i>Name of organisation / agency:</i></p> <p><i>Contact person:</i></p> <p><i>Telephone numbers:</i></p> <p><i>Email address:</i></p> <p><i>Agreed action or advice given:</i></p>
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<b>Your Signature:</b>		<b>Print name:</b>	
<b>Date:</b>			

Contact your organisation's Designated Safeguarding Officer in line with Brentford Football Club reporting procedures.