



# **SAFEGUARDING POLICY AND PROCESSES FOR CHILDREN AND ADULTS AT RISK**

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## **FOREWORD BY CEO**

I am delighted to provide the foreword for this updated policy which outlines the continuing commitment of Leicester City Football Club (the "Club") to develop and maintain a safe and positive environment for all individuals and members of the community whom we come into contact with on a daily basis.

Safeguarding is a key component of the Club's drive to support the safety and wellbeing of children and adults at risk. We understand the importance of constantly evolving our policies, procedures, and practice to ensure the safety of the most vulnerable involved in our game.

We have adopted the requirements and recommendations of the relevant football regulatory authorities and other organisations concerned with the safeguarding of children and adults at risk in preparing this updated policy. We continue to work in close partnership with the Disclosure and Barring Service (DBS) to ensure that we have robust and effective risk management procedures in place when recruiting employees and volunteers, who will have regular/occasional unsupervised contact with or influence over children and adults at risk within the Club and the Community.

We constantly strive to prevent abuse, bullying and neglect to ensure that everyone has access to the opportunities that the Club is able to provide both internally and externally within the local community. It is the responsibility of everyone who has contact with children and adults at risk to create a positive environment in which they can participate, and to protect them from harm. This policy strives to achieve a framework and guidance for best practice for everyone involved in delivering activities across the Club environment. Implementation of the processes and guidance in this document will ensure consistency across all Club activities and serve to minimise any risks.

As a Club we continue to develop our reputation for best practice in the safeguarding field and we are always proactive in adapting to the new challenges that arise in our diverse activities. This is evidenced by the Premier League Safeguarding Audit carried out by Barnardo's last season that found all the Premier League Standards for Safeguarding continue to be met.

Processes and procedures have been put in place to ensure that we continue to maintain and indeed improve this reputation for years to come.

**Susan Whelan**  
**Chief Executive Officer**  
**Leicester City Football Club**

**July 2023**

## SAFEGUARDING POLICY AND PROCESSES

### 1. INTRODUCTION AND DEFINITIONS

Leicester City Football Club ("the Club") aims to adopt the highest possible standards and takes all reasonable steps to safeguard the children and adults at risk with whom it engages.

All references to the "**Club**" include the activities and operations of the Men's and Women's Academies, the activities and operations of Leicester City in the Community and other activities/events involving children and adults at risk across the wider club including matchdays.

"**Child and children**" means any person under the age of 18 and "**Adult(s) at risk**" means any person aged 18 or over who has needs for care and support (whether or not the local authority is meeting any of those needs) and is experiencing, or at risk of, abuse or neglect and as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of, abuse or neglect. This may include people with learning disabilities, sensory impairments, mental health needs, older people and people with a physical disability or impairment. It may also include people who are affected by the circumstances that they are living in, for example, experiencing domestic violence (this list is not exhaustive). An individual's level of vulnerability to harm may vary over time depending on the circumstances they are in and their needs at that time.

We take our safeguarding responsibilities very seriously and particularly where children and adults at risk are present at any of our Club led activities, at our premises and/or under the supervision or care of one or more members of our staff. As a result of their roles and responsibilities at the Club, staff have a "duty of care" towards the children and adults at risk with whom they come into contact during their employment to keep them safe; this can be exercised through the development of respectful, caring and professional relationships between adults and children/adults at risk.

All participants and visitors to these activities have the right to feel and be safe, valued and respected. Wherever they come into contact with us, they will be treated lawfully and fairly and with both dignity and respect. All the members of our staff have a duty to keep children and adults at risk safe and to help protect them from abuse or harm. All managers must ensure that their staff understand and apply that duty at all times.

This policy applies to all employees, workers, and volunteers ('**staff**') of Leicester City Football Club, Leicester City Football Club Women, Leicester City in the Community and all partner organisations including commercial partners, licence holders, contractors, consultants and trustees. It also applies to individuals not included in this list who may be conducting related work that involves the children and adults at risk in our care. For the avoidance of doubt, **staff** includes the Premier League definition of staff which is "any person employed or deployed by a Club or Club Community Organisation whether in a paid, voluntary, consultancy or third-party capacity".

This policy has been prepared in accordance with Working Together to Safeguard Children July 2018 and other legislative requirements (including, but without limitation, the Children Act 1989, Children Act 2004, Care Act 2014 and Mental Capacity Act 2005), The FA Premier League Rules (in particular Section 5, the Safeguarding of Vulnerable Groups and Safer Recruitment), The FA Women's Super League Rules and The English Football Association (including The FA Safeguarding Children Rules) to ensure national standards for safeguarding are met and implemented throughout the Club.

The Club has also consulted with an expert in safeguarding (formerly a Director of Children's Services) and a Local Authority Designated Officer. In addition, the Club has obtained

feedback from the NSPCC and the Ann Craft Trust and responded to recommendations given by Barnardo's during previous Premier League Safeguarding Audits.

This Policy will be reviewed annually and whenever there is a change in safeguarding legislation, a safeguarding incident or significant organisational change. A copy of this Policy will be issued to the Local Authority and the relevant League.

### **1.1 Safeguarding Context**

The term "safeguarding" is a shortening of the phrase "safeguarding and promoting the welfare" of children and adults at risk.

### **1.2 Purpose of this Policy**

By implementing this policy across all Club activities and operations, all members of staff will understand that they have a responsibility to work together to safeguard children and adults at risk and that:

- The individual's safety and welfare is of paramount importance, particularly where children and adults at risk are involved.
- All people (and particularly children and adults at risk), regardless of age, gender, racial origin, political or religious belief, sexual identity and ability or disability have a right to enjoy sport and associated activities of the Club free from abuse and all forms of bullying, harassment and discrimination.
- All individuals and organisations involved with the Club have responsibilities for the welfare of children and adults at risk in our activities and are bound by this policy.
- All individuals and organisations involved with the Club must act in accordance with the law in relation to such matters.

For Club activities and operations, it also means: supporting 'Safer Recruitment' processes through promoting good practice for those working amongst our staff; supporting them where necessary; ensuring staff are qualified, competent, well-managed, and challenged when engaged in poor practice; and, finally, taking action where concerns arise.

## **2. LEICESTER CITY FOOTBALL CLUB SAFEGUARDING FRAMEWORK**

This policy is the basis for a Club safeguarding network that seeks to implement a clear and effective programme of work that is embedded across all staff.

### **2.1 Our Safeguarding Vision**

The Club will:

- Proactively seek to promote the welfare, rights, wishes and feelings of children and adults at risk.
- Recruit, train and supervise staff to adopt best practice in order to safeguard and protect children and adults at risk from abuse and themselves from false allegations.
- Ensure that safeguarding concerns or allegations of abuse are taken seriously and responded to efficiently and appropriately.

### **2.2 Our Safeguarding Aims**

1. To provide a safe and welcoming environment for children and adults at risk involved in any Club led activities, wherever they are in the world, free from abuse and fear of abuse in all its forms.

2. To establish and maintain a culture where safeguarding practice is widely understood, openly discussed and where all staff recognise the role they play in keeping children and adults at risk, themselves, and their colleagues, safe from harm.
3. To develop a clear system which promotes and supports constant vigilance, prevention, and early intervention in safeguarding matters and, where necessary, prompt and thorough action in response to any reported concerns or incidents.
4. To apply legislation, government policy and guidance and football governing body regulations, policy, and guidance where applicable.
5. To work closely together with local statutory agencies and other partners to promote and safeguard the welfare of children and adults at risk.

In order to realise these aims, we are committed to:

- **Work or liaise with relevant football governing bodies, statutory agencies and other child/adult at risk welfare bodies** (e.g. Child Protection in Sport Unit, NSPCC, Ann Craft Trust, relevant League, Women's Super League, The FA, etc.) to ensure we meet all necessary regulations and standards in respect of our safeguarding practice.
- **Listen to children and adults at risk** and take them seriously, consult with them when developing processes and react appropriately to ideas, feelings and concerns, then address them in a fair, effective and timely manner.
- **Develop and communicate a series of clear policies, protocols and guidance** designed to help deliver sound governance and good practice across the Club's activities.
- **Maintain a visible safeguarding presence** across all areas of the Club including on internet platforms.
- **Monitor activities** taking place at Club facilities and those at off-site locations.
- **Provide training, advice, and support** across all areas of the business where children and adults at risk are involved in any Club led activity.
- **Support and help deliver the Club's 'Safer Recruitment' philosophy** in accordance with local legislative and regulatory requirements and in partnership with the HR department.
- **Maintain confidentiality** of all information and documentation relating to DBS disclosures, concerns, allegations, and incidents in accordance with relevant data protection legislation.
- **Share sensitive information with the relevant authorities** when it is appropriate to do so and in the knowledge that the information will be treated confidentially.
- **Appoint Designated Safeguarding Leads** in different areas of the Club to create a visible safeguarding presence to ensure this policy and associated procedures are followed.
- **Develop an effective network of Designated Safeguarding Officers/Safeguarding Champions** across the Club who will promote the highest standards of safeguarding in their respective areas of the Club.

### 3. PRINCIPLES OF ADULT SAFEGUARDING

#### 3.1 Adult's Right to Self-Determination

One important difference between safeguarding adults and safeguarding children is an adult's right to self-determination. Adults may choose not to act at all to protect themselves, and it is only in extreme circumstances that the law intervenes. This can make the matter of safeguarding adults more complex. It is not solely focused on creating an appropriate process and system to safeguard. It also needs to take into account the importance of creating a culture that embraces the adults themselves, informing and consulting them on all decisions affecting them.



The Club recognises the crucial differences that apply to adult safeguarding and acknowledges an adult's right to self-determination. Accordingly, The Club applies the principles of the Care Act 2014 to fulfil its moral and legal responsibility to safeguard and promote the welfare of adults at risk and provide a safe and welcoming environment where adults at risk are respected and valued.

The **Care Act 2014** sets out the following principles that should underpin safeguarding of adults to achieve the best outcomes for adults at risk:

- **Empowerment** - People being supported and encouraged to make their own decisions and informed consent.
- **Prevention** - It is better to take action before harm occurs.
- **Proportionality** - The least intrusive response appropriate to the risk presented.
- **Protection** - Support and representation for those in greatest need.
- **Partnership** - Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
- **Accountability** - Accountability and transparency in delivering safeguarding.

### 3.2 Making Safeguarding Personal

'Making safeguarding personal' means that adult safeguarding should be person led and outcome focussed. It engages the person in a conversation about how best to respond to their safeguarding situation in a way that enhances involvement, choice, and control. As well as improving quality of life, well-being, and safety.

Wherever possible discuss safeguarding concerns with the adult to get their view of what they would like to happen and keep them involved in the safeguarding process, seeking their consent to share information outside of the organisation where necessary.

It should always be remembered that all adults at risk have a right to be safe and to be treated with dignity and respect, with a right to privacy.

## 4. WHO DOES THIS POLICY APPLY TO?

To illustrate the scope of this work, the list below provides an extensive (though not exhaustive) list of examples or situations across the Club where we need to consider the welfare of people in our care:

- Players involved in the Men's or Women's Academy or associated football development programmes.
- Under-18 players who are part of open age/senior squads.
- Children and adults at risk taking part in Club activities.
- Supporters with disabilities and other vulnerabilities contacting the Club, visiting the stadium on matchdays, for events or concerts, or visiting for other pre-arranged activities.
- Young players on tour or living for significant time away from their families in Leicestershire-based accommodation.
- Ball persons, matchday mascots, player escorts, flag-bearers or children involved in other matchday experiences.
- Support to those who may be vulnerable to bullying or cyberbullying through their relationship with any of the Club's activities.



- Young people under 18 attending as volunteers, on organised work experience or as apprentices.
- Children and adults with disabilities taking part in any Club activities.
- Children and adults at risk taking part in programmes delivered by Leicester City in the Community.
- Children and adults at risk involved in activities organised by other agencies benefitting from the Club's charitable programmes.
- Those with additional vulnerability e.g. looked-after children, those in care, those with mental health issues, physical and learning difficulties. The Club will carry out appropriate risk assessments to ensure there is always an appropriate staff-to-participant ratio with respect to needs and age.

See the Club Mental Health Framework for further information.

## **5. MANAGING CLUB BEHAVIOUR**

The Club takes a positive approach to behaviour management and, where necessary, develops policies that all staff must apply. Such policies will recognise the following general principles:

1. Every person is different and as such has individual needs.
2. Participants should be encouraged to help develop their own codes of conduct or have clear and well communicated guidance on expectations.
3. Behaviour is usually a reflection on how a person is feeling.
4. Staff should recognise that many other factors can affect behaviour – weather, hunger, medical conditions and/or medication and account for these in any action taken.
5. Challenging, aggressive or violent behaviour presents risks to the individual and others, and physical intervention with any individual displaying such behaviour is only ever a last resort in exceptional circumstances – any response must be reasonable and proportionate.
6. Physical punishments will never be used by our staff, though diffusion and de-escalation techniques may when necessary.
7. All significant incidents must be recorded and passed to the Head of Safeguarding.

## **6. DATA PROTECTION**

The Club takes the matter of data protection very seriously and particularly the data collected in respect of children and adults at risk. The Club will apply the principles set out in the General Data Protection Regulation (GDPR) and other current relevant data protection legislation including the Data Protection Act 2018 in respect of our data collection activities. Further information is contained in the Club's Data Protection Policy & Privacy Notice. Where data is collected (in writing or electronically) relating to children, or children are asked for personal details, we will make every effort to obtain agreement for its use from those with parental responsibility. We will also make every effort, where data is collected in respect of an adult at risk, to obtain agreement for the use of such data from the adult concerned. We will seek the consent of the adult or parental/carer consent in relation to a child when it is necessary for us to collect data for the specific purposes set out below:

- Disclosure of a child's or adult at risk's name and address to a third party, for example as part of the terms and conditions of a competition entry or partnership activation.
- Use of a child's or adult at risk's contact details for marketing purposes.

- Publication of a child's or adult at risk's image on a website that the public can view (subject at all times to the Club's terms and conditions relating to access to King Power Stadium on matchdays).
- The collection of personal data about third parties, for example where a child or adult at risk is asked to provide information about his or her family members or friends.

In the event of a child, young person or an adult, or an adult family member/carer asking for a photograph to be removed, this shall be done without delay.

### **6.1 Celebrating Activity with Photography and Video Images**

The Club welcomes photographs and images that celebrate the sport, the values and objectives of the Club and positive reflections of our Club operations. We understand however that photography and video imagery and its use can present difficulties, risk, and sensitivity in a range of circumstances. During the course of our activities a child's or adult at risk's image may be captured by appointed photographers in digital photographs and in film. These images may then be used by Club staff and contractors in both internal and external news and marketing publications and online via websites and social media.

### **6.2 Data Protection Law and Photography**

Data protection law may apply to the photography of children and adults at risk at Club activities. Where it applies and, where practical, if images are captured by a member of staff or for Club purposes, informed and specific consent from the parent/carer of the child or the adult at risk themselves should be obtained (see section 6.4 below). If in any doubt a picture should not be taken.

### **6.3 Video or Photographs as a Coaching or Management Aid**

The recording of training or match footage is a legitimate coaching aid and as such, parents and players are made aware that this is part of the coaching programme. No footage is taken for scouting purposes. Only parents can access footage of their child taken at training or at matches. Similarly photographs of matches or players for management purposes (e.g. ID passes or databases) are regularly taken. Both these types are covered by data protection law. As such, all those responsible for the recording of this footage must:

- Adhere to this policy.
- Take responsibility for the safe storage, distribution and destruction of the images.
- Give due consideration to the dignity and protection of the players involved.
- Obtain specific additional consent from parents where there are changes to the planned use of the footage which will lead to a wider distribution of the images than originally anticipated.

All video footage or photographs taken will only be captured and/or stored on Leicester City Football Club IT devices. Staff must not use their own devices for this purpose.

### **6.4 Consent for Photography and Video Images**

Where an activity may allow for the capture, and thus use, of a participant's image, the manager responsible must use the Club Image Consent Form or develop appropriate documentation (forms and guidance) and associated processes to allow for the management of parental consent for children, or participant consent in respect of an adult at risk. The documentation and processes must ensure informed and specific consent is obtained for the use of any images, however captured, and that those individuals understand what they are consenting to and why.

### **6.5 Right to Choose Not to Consent**

Other than on match/event day (see below), individuals have the right not to give consent or revoke their consent to being photographed/filmed. Here our staff will endeavour to make

suitable arrangements to apply any restrictions required whilst also minimising the disruption to normal Club activities. These arrangements will be agreed in advance with those with parental responsibility for the child and must uphold the dignity of the participant choosing not to consent. Where an adult at risk chooses not to consent the arrangements will be agreed in advance and must uphold the dignity of the adult concerned.

### **6.6 Storage**

All images, whilst held by the Club, will be securely stored on the Club's IT systems or secured cloud-based servers, and remain the Club's property at all times. Where footage is passed to players and parents for training and development purposes, this must not be passed on further or published without the written permission of the Club's management staff. Families must be made fully aware of this restriction at the point of distribution.

### **6.7 Match Day, Events, Incidental Image Capture, and Implied Consent**

Large crowds create further issues with consent and image use. At events such as matches, concerts and special events, consent is assumed to be 'implied' in that any person attending should expect that their image may be captured or broadcast. In any situations where children or adults at risk may be subject to 'incidental image capture' (i.e. they are in the background behind a main subject), where practical they should be informed that they may be on camera and have the opportunity to choose not to be photographed/filmed.

Where consent has not been given but images have been accidentally captured, those images should follow the guidelines shown below but also should be of a general nature capturing the activity and not the individual and should not use the adult's or children's names in resulting public use.

Where a person finds that their image or that of their child has been used in these circumstances and they do not wish it to be used, then we will endeavour to remove it from circulation where it is practical to do so and where there are reasonable grounds to do so.

### **6.8 Parents, Other Children and Other Photographers**

The Club recognises that in some circumstances parents, other family members and friends may wish to take photographs of their own children or relatives. The Club will develop clear rules on what is acceptable. Where a member of staff, child or parent or adult at risk has a concern about the capture and use of images, they should report it immediately to the activity or site manager.

With the advent of smart phones with digital cameras and instant connectivity to the worldwide web, the scope for the capture and sharing of images has increased dramatically and as such, activity managers should take care to apply the policy firmly and fairly.

Members of staff and other appointed photographers capturing images must avoid:

- Using their own/personal equipment to capture images of participants.
- Images taken in changing rooms or where children or adults at risk are not fully clothed.
- Images of children who wish not to be in the photograph or whose parent does not wish them to be or an adult at risk that does not wish to be in the photograph.
- Images where children or adults at risk are more vulnerable – upset, injury, illness, unnatural positions.
- Images that are sexually suggestive or provocative.
- The inclusion of children's or adult's at risk full name in any captions, kit or reports.

## **7. RESIDENTIAL ACCOMMODATION**

The Club may, in the course of its activities, be required to provide both short- and long-term accommodation for young participants under 18 and adults at risk. This may occur in a range of settings and may be arranged by or involve Club staff, such as:

- Trips and tours involving overnight stays for children or players under 18.
- Trips and tours involving overnight stays for adults at risk.
- Academy players living in Club facilities or in domestic settings with approved host families or other accommodation providers.
- Young players on trial with Academy teams.
- Children and/or adults at risk participating in Community programmes or projects.
- Commercial activities delivered in partnership with third party operators responsible for the provision of accommodation.

It is vital that wherever such situations arise, the highest level of diligence is provided to the arrangements. Managers must ensure that all applicable legislation, regulation, and good practice (including that from any other host country) is applied to any of the above settings and that any relevant authorities are consulted with throughout the planning and operation of these provisions.

The same level of diligence is required where a third party is responsible for making accommodation arrangements for children and adults at risk in our care. It is the responsibility of our staff to ensure that third party operators maintain our high standards of care. This should be documented clearly in any contract or service level agreement with any third-party providers.

### **7.1 Selection of Carers**

The appointment of any staff or carers (including host families and/or host parents) with responsibility for the supervision of children overnight in residential settings and/or Club accommodation must be carried out in accordance with this policy and must apply Safer Recruitment principles to ensure suitable appointments are made. As a minimum these staff must comply with the Club's safer recruitment processes and the additional measures of suitability for host families and/or host parents under the respective Academy Accommodation Policy.

## **8. SAFEGUARDING AND THE CLUB'S STAFF**

Safeguarding is also about ensuring that all employees, workers, and volunteers ("staff") and partners understand the role they play in protecting children and adults at risk. Across the Club there will be a wide range of employment and deployment arrangements involving full-time or part-time staff or consultants.

The staff are what makes this policy 'live'. This means all members of staff who are involved in training, managing, supervising or caring for children and adults at risk.

They must work conscientiously to help keep those in their care safe from harm. They must also be aware of how to keep themselves and their colleagues safe from having allegations made against them by maintaining professional boundaries and avoiding behaviour that may be misinterpreted by others. In turn this has a direct impact on maintaining the reputation of the Club.

### **8.1 Positions (and Relationships) of Trust**

As a result of the roles and authority that many members of our staff hold, they are considered to be in a "position of trust" in relation to those in their care, which carries authority, status,

power and responsibility. Examples of positions (and relationships) of trust include but are not limited to: a member of the Community working with children or adults at risk, a coach in the Academy or Community, a team manager, a scout, a physiotherapist, a driver, a learning mentor/tutor, an apprenticeship supervisor as well as staff engaged in matchday activity involving children, young people and adults at risk including supervising mascots, stewards, hosts/hostesses, catering personnel and photographers.

If the adults involved are positive role models displaying high moral and ethical standards, the benefit to children, young people's and adults at risk development can be significant. This means that where any staff are in a position of power and influence over children and adults at risk they must not abuse their position for personal advantage or gratification or that of others. Any such abuse will be regarded as gross misconduct. Staff must also report any concern they have about another member of staff to the Head of Safeguarding. All members of staff working with children and adults at risk are required to sign up to and thereby agree to the principles as set out in the "Premier League Guidance for Safer Working Practice".

### **8.2 Age of Consent, Children and Positions of Trust**

This policy considers a child to be someone who is not yet 18 and as such, emotionally dependent. An intimate or sexual relationship between a member of staff and a child or adult at risk in their care is prohibited and will be subject to disciplinary action. A breach of this rule is considered an act of gross misconduct and will result in a referral to the relevant statutory agency. For the absence of doubt, this applies to members of staff and participants who may have travelled overseas from their country of origin or those travelling abroad as representatives of the Club.

The law has now extended position of trust offences which means that any sexual relationships/activity between adults in sport who are in a "position of trust" and persons aged 16 and 17 will also constitute a criminal offence.

### **8.3 Safer Working Practice and Lone Working**

A lone worker, for the purpose of the "Premier League Guidance for Safer Working Practice", is defined as a member of staff who is engaged in activities which place them in a situation without direct contact with other staff or without direct supervision. Lone working and one-to-one situations with children and adults at risk have the potential to make children and adults at risk more at risk of harm by those who seek to exploit their relationship or position of trust.

Therefore, all staff working with children and adults at risk are expected to work in an open environment and within sight or hearing of others. Staff should ensure that they do not allow a lone working situation to occur and all risk assessments should have control measures to minimise the risk that lone working situations can occur and swift action including the cancellation or closing of sessions if a lone working situation should occur.

However, it is recognised that one-to-one situations may occasionally be necessary in a learning environment especially if they are to avoid damaging the self-esteem of a student/participant or young player. Wherever possible it is advisable to draw the student/participant or player to one side so that, although private, the discussion may take place in full view of others. Where one-to-one situations are necessary they require additional safeguards to be put in place which should be documented in a risk assessment. This is for everyone's protection. If it is considered that such a discussion will benefit from being away from others, a meeting should be organised with the knowledge of a senior member of staff. If possible, another member of staff should also be present or doors left open. Whenever possible or appropriate parents should be present at such meetings.

Under no circumstances should staff visit children and adults at risk in their homes outside agreed work arrangements. Nor should staff invite children and adults at risk to their own home or to that of a family member, colleague, or friend. Contact by whatever means and meetings

with children and adults at risk outside agreed working arrangements should not take place without the knowledge and agreement of the HR Director and one of the Head of Safeguarding, Training Ground and Academy Safeguarding Lead, Women's Safeguarding Lead or Community Safeguarding Lead and in the case of a child, they should not take place without a parent/guardian being present. In the case of an adult there should be an appropriate adult present.

#### **8.4 Support for Adults with Additional Needs**

Where adults that come into contact with the Club have additional needs (for example they may have a learning difficulty or may use a different language) it is important that staff ensure that they have an appropriate adult, advocate, or other person to support them in addition to ensuring that there is an interpreter for any languages that are used when they speak to or interview any adult with additional needs.

#### **8.5 Standards of Behaviour - Adults**

In order that they maintain the confidence and respect of children, adults at risk, parents, customers, supporters and colleague our staff will adopt the highest standards of behaviour at all times. Within the scope of their duties, their actions should always be reasonable, appropriate, warranted, proportionate, safe, and applied equitably.

Staff should be aware that:

- Behaviour outside of work time may impact upon their suitability to work with children and adults at risk.
- Breaches of the law and of this policy may result in criminal and/or disciplinary action being taken against staff.

### **9. INFORMATION AND COMMUNICATION TECHNOLOGY (ICT)**

ICT is used across the Club in many and varied ways. Its use will continue to grow and change with new developments in technology and fashion. It is used to communicate with supporters, customers, players, and the media. The Club will:

- Develop and maintain clear policies on suitable and appropriate use of the internet, email, SMS, and social media for staff and children/adults at risk.
- Ensure that consent of parents is obtained if staff use SMS, email, or other electronic means of communication with a child for programme-related reasons.
- Raise awareness amongst young participants (especially players in the respective Academies) and participants involved via the Community regarding safer internet/social media use in respect of their position.
- Raise awareness through training and internal communications with staff regarding appropriate use of such media and the importance of both professional and personal online activity.
- Have a zero-tolerance approach to 'cyberbullying', sexting, grooming and exploitation.
- Respond quickly and appropriately if there is any inappropriate use of the internet and social media by players, participants, or members of staff. Follow the procedures for raising concerns and allegations against staff in sections 14 and 15.

Since the unprecedented use of online delivery following the Covid-19 pandemic it is likely that online and virtual environments will become more widely used in the future. Staff should ensure that online and virtual environments promote safety and wellbeing whilst minimising the opportunity for children and adults at risk to be harmed in the same way they would in physical



environments. Please see Schedule 5 for more information on promoting a safe environment away from the Club and online safety.

## 10. CONSENT

The Club recognises the importance of approaching the individual needs of children and adults at risk in the appropriate way and according to the law and statutory guidance. Where a child is at risk of harm, consent to act on safeguarding concerns is not normally required in law although consent from and consultation with those with Parental Responsibility is considered good practice unless this would put the child at greater risk of harm.

### 10.1 Consent and Best Interests

**Children:** We will always respect the right of a child to have their say when a decision that affects them is being taken. We will take their views into account and always act in their best interests when a decision is made, especially when a child is at risk of harm or may have come to harm. A child's parent or legal guardian will also be consulted and consent obtained as a matter of course before any action is taken unless this may put the child at increased risk of harm. Care should be taken to seek and establish the consent of all those with parental responsibility for that child. Where a parent or legal guardian cannot give consent at a point where it may be required, staff will always act in the best interests of the child.

**Adults:** If an adult who may be at risk of abuse has the capacity to consent then they must have the opportunity to consent before a decision is made that affects them – e.g., passing on a concern to statutory agencies. Club staff will assume that an adult has the capacity to consent unless it is established that they lack this capacity. **A seemingly unwise decision should not be mistaken as lacking capacity.** We will always act swiftly (and possibly without consent) where the individual is put at immediate and significant risk of harm and will always act in their best interests and/or where others may be at risk. The Club will act in accordance with the Mental Capacity Act 2005 when making any decision about an adult's capacity to consent.

**Best Interests:** Any decisions taken on behalf of someone who is deemed, at the point where a decision must be made, to lack capacity or unable to give consent, will be taken in his or her best interests. Where possible, Club staff will take into account (known) past or future wishes and religious or moral beliefs. Where necessary a capacity assessment and a best interests meeting will be held.

## 11. STAFF RECRUITMENT

The Club recognises that anyone may have the potential to harm or abuse children and adults at risk in some way and is committed to taking all reasonable steps to ensure that unsuitable people are prevented from working with children and adults at risk. In furtherance of this, the Club has a detailed Safer Recruitment and DBS Policy (which can be found in Schedule 4) which sets out the Club's safer recruitment processes in full.

The LCFC Safer Recruitment Process appended to the Safer Recruitment and DBS Policy demonstrates the Club's commitment to safeguarding in recruitment and selection and the embedding of safeguarding in the Club's recruitment and selection processes and procedures.

When recruiting for all posts with regular/occasional contact with or influence over children and adults at risk, the Safer Recruitment Policy ensures that all stages of the recruitment process and beyond, contain measures to deter, identify, prevent, and reject unsuitable people from gaining access to children and adults at risk who come into contact with the Club.

The Safer Recruitment and DBS Policy in Schedule 4 (and associated policies and procedures) should be referred to for full details of the Club's safer recruitment processes but include in particular:



- An **interview process which assesses the applicant's suitability** for the particular role, their attitude towards children and adults at risk and their ability to perform the role.
- In line with relevant League rules, **obtaining at least two written references** for all posts with regular/occasional contact or influence over children and adults at risk before a post is offered, with one reference from the last employer or from an organisation which has knowledge of the applicant's work or volunteering with children and adults at risk.
- Requiring the **completion of a Self-Declaration Form** as appropriate to the role which requires staff to disclose any convictions, cautions, reprimands, or warnings as part of the recruitment process and imposes an ongoing obligation to disclose any that arise during the course of employment, in order that appropriate safeguards are put in place.
- Ensuring **all relevant pre-employment checks are completed** for prospective new starters including right to work checks, the validation of any essential qualifications, a **DBS check** for eligible roles and/or identity check, which should identify name, current address, and date of birth.
- Ensuring that where staff have lived or worked outside of the UK for a period of 3 months or more within the last 5 years, and they were aged 16 or over at the time, they undergo an **overseas criminal record check** in accordance with Home Office Guidance.
- Ensuring that, when a positive disclosure is received or issues are raised in the references and pre-employment checks, the appointment decision is made by the respective Department Manager in conjunction with the Head of Safeguarding after carrying out a risk assessment process.
- Routinely renewing DBS checks in accordance with best practice for all roles that are eligible for a check. This will include completing a new Self Declaration Form when a DBS is renewed.
- Where a Club member of staff has been safely recruited for a new role in the Club: if they have a DBS, ensure that it is relevant for that role and if not then a new DBS will be required. A Self Declaration Form will also need to be completed.

Further to this, all staff must complete a **Safeguarding Induction** which is specific to their role to ensure that they understand their responsibilities for safeguarding and how to report any concerns. The Premier League Guidance for Safer Working Practice is given to all staff during the Safeguarding Induction. All staff who have regular/occasional contact with or influence over children and adults at risk will also be required to attend ongoing regular safeguarding training relevant to their particular role.

## 12. STAFF TRAINING

For all roles working with children in the respective Men's and Women's Academies and in the Community the FA Safeguarding Children Workshop is a mandatory minimum requirement. For some roles in the Community an alternative Safeguarding Children or Adult Certificate may be recommended. In addition, a programme of annual CPD is provided for roles in the respective Men's and Women's Academies and in the Community. Additionally, for roles based in schools or connected to school provision (e.g., day release and other alternative education provision) staff will be familiar with the latest version of Keeping Children Safe in Education.

For other roles in the Club bespoke role specific safeguarding training and appropriate refresher training is provided commensurate with their roles.

All staff will be offered relevant additional safeguarding training on various safeguarding themes for their role through the Premier League and other safeguarding training providers.

Designated Safeguarding Officers/Safeguarding Champions will receive Club specific and bespoke training for their role. Safeguarding personnel (Safeguarding Leads and Designated Safeguarding Officers/ Safeguarding Champions) will receive training across a broad range of the safeguarding landscape commensurate with their role through the Premier League and other safeguarding training providers.

In line with the relevant League Safeguarding Standards the CEO and Directors will receive a safeguarding awareness briefing annually.

We will also work with players and parents to raise awareness of safeguarding issues that may affect them (such as social media issues). This will include a recommendation for parents of players in the Men's and Women's Academies to complete the FA Safeguarding Awareness for Parents and Carers.

### **13. PARTNERSHIPS AND COMMISSIONED SERVICES**

The Club will actively promote safeguarding within all partnership working and commissioned services involving children and adults at risk and will seek to establish minimum safeguarding standards by assessing the partner or external provider's suitability, ensuring that they have appropriate safeguarding policies and procedures in place and determining how to manage any safeguarding concerns that may subsequently arise. Such considerations must be made explicit in any contract or service level agreement with any partners or external providers. The Head of Safeguarding must draft/recommend the safeguarding clauses of any contract or service level agreement prior to such clauses being approved by the Club's Legal Counsel and HR Director.

Where the delivery by a partner or external provider involves working with those that are particularly vulnerable, additional considerations will need to be addressed to ensure that the contract or service level agreement ensures a thorough safeguarding risk assessment is undertaken and sufficient protection for all staff and children and adults at risk is in place. Conversely where delivery by Club staff on behalf of/in conjunction with a partner or external provider involves working with those that are particularly vulnerable, the same considerations will need to be addressed to ensure that proper arrangements are made by our partners in the contract or service level agreement for the safety and welfare of our staff.

### **14. RAISING CONCERNS**

Safeguarding concerns fall into one of the following types:

1. The behaviour of an adult towards a child or adult at risk.
2. The behaviour of a young person towards other children (including bullying by peers) or the behaviour of an adult at risk towards another adult at risk or child.
3. Risks identified through recruitment processes (e.g. criminal records information).
4. Information about an individual provided by statutory agencies or other similar route.
5. Allegations of abuse.
6. Concerns about harm to a child or adult at risk that has taken place outside of a Club activity (e.g. at home or school) but identified within a Club activity.

For members of staff these concerns can apply to both their professional and personal lives and poor conduct in either may affect their position in the workplace.

All staff are encouraged to raise any concerns about adults no matter how small including where the threshold for an allegation is not met (see section 15). In the Safeguarding Induction there is a focus on appropriate and professional behaviours rather than an over reliance on DBS checks and all staff are encouraged to raise concerns if they have a "seed of doubt". This

enables the early identification, prompt, and appropriate management, including education and support, of any concerns about adults.

It is expected across the Club that departmental heads and managers will create a positive culture where poor practice is challenged and concerns can be spoken about openly with trust and transparency to develop a strong safeguarding system where concerns are shared responsibly with the HR Director and Head of Safeguarding, recorded, and dealt with appropriately.

#### **14.1 Raising Concerns and Mandatory Reporting**

If any member of the Club's staff has a concern about a child or an adult at risk, they have a duty to refer this to the Head of Safeguarding or Designated Safeguarding Lead. The Designated Safeguarding Lead will in turn report any concerns to the Head of Safeguarding and/or the HR Director. The paramount priority is to ensure the safety of any child or adult at risk. If there is immediate risk of harm, a serious injury or a criminal offence may have been committed, then the police or other emergency services must be involved at the earliest opportunity.

Where a very serious concern is raised that involves a child or adult at risk involved in Club led activity or a member of staff is involved in an allegation against a child or adult at risk, the Senior Safeguarding Lead (the CEO) or the HR Director must be informed. The Head of Safeguarding will inform all the safeguarding contacts within the relevant football authorities (including The FA Premier League and the FA) immediately and the Local Authority Designated Officer where appropriate.

#### **14.2 Whistleblowing**

The Club views the reporting of concerns by members of staff as a vital element of maintaining its core values. Individuals are strongly encouraged to report incidents of malpractice where the law, Club policy or protocol has been breached by another member of staff. Such reports may be made to the HR department, the Head of Safeguarding, a Designated Safeguarding Lead or a Line Manager and, where appropriate, the information will be shared. Failure to do so may result in disciplinary or criminal action. See the Club's whistleblowing policy for further information.

Alternatively, staff can consult the FA/NSPCC Whistleblowing Helpline on 0800 028 0285 or the police/local authority (See Schedule 3 Useful Telephone Numbers).

#### **14.3 Referral Management**

Where a concern is raised relating to the behaviour of a member of staff towards a child or an adult at risk, there is a need to manage that referral in a swift and confidential manner with the direction and assistance of the Head of Safeguarding.

Where concerns about children and adults at risk could be of a serious nature, a referral to the police or Children's Services/Adult Services should be made at the earliest opportunity with the direction and assistance of the Head of Safeguarding.

#### **14.4 Allegations against staff and Volunteers**

The responsibility for responding to concerns, allegations, or disclosures in respect of staff and volunteer's rests with the Head of Safeguarding who will pass this information onto the HR Director and the Senior Safeguarding Lead (the CEO of the Club).

An individual staff member's knowledge of a concern, allegation or disclosure places a responsibility on the individual member of staff, whatever their role, to ensure that action is taken. It is their responsibility to:

- Report the information about members of staff or volunteers to the Head of Safeguarding or Designated Safeguarding Lead immediately.
- Make a signed, dated, and timed record of what has been noticed, said, and done and give this to the Head of Safeguarding.
- Ensure that they maintain complete confidentiality.

The procedure for reporting allegations or concerns in respect of staff and volunteers is set out below in Managing Allegations against Staff and Volunteers on page 22.

#### **14.5 Monitoring and Record Keeping**

It is important that all staff record, without delay, anything which they observe or have been told where a concern has been identified. If possible, they should find a quiet place and endeavour to write an accurate record, whilst being scrupulous in leaving out their own feelings and remaining objective throughout.

Reports should be made using My Concern (within the same working day). Wherever possible staff should contact the respective Designated Safeguarding Lead or the Head of Safeguarding to discuss their concerns before recording on My Concern. All written evidence recorded at the time will need to be uploaded to My Concern. This is important in the event a case goes to court and will form the basis of legal evidence. All reports and records should be written, signed, dated – including the year, and timed.

If a child or an adult at risk has told you something, it is important that it is written down in their own words. If a child or adult at risk has difficulty telling their story to the extent that they stop because they have started crying, this must be noted.

All reports must be kept factual and not subjective. Reports must include the following:

- Name of the child or adult at risk.
- Nature of concern.
- Date and time of particular incident.
- Details of who the concern is about.
- A note or sketch of injury, i.e. its size and appearance (where possible use the Leicester City Football Club "Body Form" which is available through the Head of Safeguarding or a Designated Safeguarding Lead).

The above information must be entered onto My Concern in conjunction with the Head of Safeguarding or a Designated Safeguarding Lead who will provide advice, guidance, and support.

When is a record required to be made?

- Marks on a child's or adult at risk's body.
- Information from others.
- Unusual, different behaviour.
- Puzzling statements or stories from the child or adult at risk.
- Mood changes that appear drastic.

What should be recorded?

- Patterns of attendance.
- Changes in mood.

- Changes in functioning/training.
- Changes in behaviour, becoming aggressive, passive.
- Changes at home/within family.

The Club will keep a record of all incidents and concerns reported to its Safeguarding team using My Concern, which is the preferred electronic case management system by the Premier League and meets all the requirements of data protection legislation. Any such reports will be taken seriously, carefully recorded, acted upon where appropriate and confidentially retained. Records will be regularly reviewed in order to identify patterns of behaviour that may give rise to concern.

#### **14.6 Guidance to Staff on Responding to Concerns and Disclosures**

It is not the responsibility of staff to decide whether or not abuse has taken place but there is a responsibility to act on any concerns. The following guidelines will offer staff help and support in responding to a disclosure from a child or adult at risk after ensuring the immediate safety of the child or adult at risk.

##### **DO:**

- Call 999 if someone is injured or at immediate risk, let one of the Club's Safeguarding and Welfare Officers know if you take that course of action.
- Remain calm and make sure the person at risk, as well as yourself, are safe.
- Treat any allegations extremely seriously.
- Tell the child, young person or adult they are right to tell you.
- Reassure them that they are not to blame. Allow them to disclose at their own pace.
- Do not make promises not to tell.
- Inform one of the Club's Safeguarding and Welfare Officers.
- Write everything down as it was said, sign, date (including the year) and time it, record it on the appropriate paperwork as soon as possible.
- Record the facts only and not opinions.
- Seek medical attention if necessary.
- Explain the next steps you will be taking.

##### **DON'T:**

- Interrogate the child, young person or adult it is not your responsibility to investigate.
- Say anything that makes the child, young person or adult feel they are responsible for the abuse.
- Make promises you cannot keep.
- Do not criticise the abuser often children, young people or vulnerable adults still have strong feelings for this person.
- Do not contact the alleged perpetrator.
- Do not ask the child, young person or adult to repeat their disclosure to another person.

#### **14.7 Appropriate Questioning**

This area is a specialist one. It should only be undertaken by social workers or police officers. Remember that a child or adult at risk may be asked to talk to someone else at a later stage. The interviewer should try to listen without interrupting them or asking questions, allowing them

to talk at their own pace and in their own words. The child or adult at risk should always be empowered by being told that they have done the right thing and that it will be taken seriously.

#### **14.8 Preservation of Evidence**

Your first concern is the safety and welfare of the abused person. However, your efforts to preserve evidence may be vital.

In all cases, but especially when police involvement is required, preservation of evidence is crucial if the police investigation is to be effective. What you do or do not do in the time whilst you are waiting for the police to arrive may make all the difference.

The following checklist aims to help you to ensure that vital evidence is not destroyed:

##### In situations of physical and/or sexual assault

- In the case of a person who has been physically abused who wishes to show you an injury, only observe what they consent to show you and what is appropriate.
- Do not touch what you do not have to. Wherever possible leave things as they are. Do not clean up, do not wash anything or in any way remove fibres, blood etc. If you do have to handle anything at the scene keep this to a minimum.
- Do not touch any weapons unless they are handed directly to you. If this happens, keep handling to a minimum. Place the items/weapons in a clean dry place until the police collect them.
- Preserve anything that was used to comfort the abused person, for example a blanket.
- Secure the room. Do not allow anyone to enter unless strictly necessary to support you or the abused person and/or the alleged perpetrator, until the police arrive.
- The police may need to organise an urgent medical examination.

##### Prior to the arrival of the police and medical examination:

- Ensure that no one has physical contact with both the abused person and the alleged perpetrator as cross-contamination can destroy evidence. It is acknowledged that if you are working alone in the situation you may have to comfort both the abused person and the alleged perpetrator e.g. where the alleged perpetrator is also a Club service-user. You need to be aware that cross-contamination can easily occur.
- Preserve any bloodied items.
- Encourage victim not to shower.
- Encourage victim not to change clothing.
- Even when the victim says they do not want police involvement, preserve items anyway as they may change their mind later.
- Encourage the person not to eat or drink if there is a possibility that evidence may be obtained from the mouth.

#### **14.9 Confidentiality**

All information collected and stored, whether verbal or written, will be treated with the utmost sensitivity, and handled in accordance with relevant data protection legislation. The Head of Safeguarding may be required to report or refer these matters to another agency such as a sport governing body or local authority. Wherever possible where a referral or report is made in relation to an adult at risk the wishes and consent of the adult concerned will be sought.

The purpose of confidentiality is to protect children or adults at risk by ensuring appropriate



privacy to them and their parents/carers. The Club will ensure that abusers are not assisted in their intentions by gaining access to confidential information.

Written or verbal information should be shared only on a need-to-know basis. All safeguarding/child protection records/monitoring should be kept away from other types of Club documentation. This information should be kept in a secure place, which can only be accessed by the relevant personnel including the Head of Safeguarding.

All staff must be aware that they cannot promise a child or adult that they will keep secrets.

#### **14.10 Prevent and Safeguarding**

Safeguarding from radicalisation is no different to protecting from other forms of harm. Staff are not expected to be an expert in identifying signs of radicalisation and extremism but need to be vigilant and ensure that they respond swiftly and appropriately to any concerns. The procedures for raising a safeguarding concern should be followed for any concerns about potential radicalisation.

#### **14.11 Reporting Non-Recent Abuse and Who Can Help**

Non-recent child abuse, sometimes called historical abuse, is when an adult was abused as a child or young person under the age of 18. Sometimes adults who were abused in childhood blame themselves or are made to feel it's their fault. But this is never the case: there's no excuse for abuse. All reports of non-recent abuse will be treated in the same way as any other contemporary reports contained in this policy and its procedures.

A person might have known they were abused for a very long time or only recently learnt or understood what happened to them. Whether the abuse happened once or many times, a year or 70 years ago, whatever the circumstances there is support to help. It is never too late to report abuse but a person does not have to report it to anyone if they don't want to. And no one should pressure or force anyone to do anything they don't want to.

Some people report non-recent abuse to stop the offender abusing other children. Some find that reporting gives them a sense of closure and helps them to start moving on.

Non-recent child abuse can be reported to the Police no matter how long ago the abuse happened. All police forces have specially trained officers who work with adult survivors reporting non-recent child abuse. A person can report to police by calling 101, going to a police station or reporting to their local force. The contact details of all police forces can be found by visiting [Police UK](http://Police.UK).

Alternatively, if a person does not feel comfortable contacting the police directly, they can contact the FA/NSPCC Child Protection Helpline **0808 800 5000** where an advisor can discuss a person's options for reporting. There are additionally other sources of support available:

- Talk to NAPAC (National Association for People Abused in Childhood) Helpline number 0808 801 0331 (calls are confidential, free from UK landlines and mobiles and can be made anonymous) or visit <http://napac.org.uk/> for a wealth of information and support.
- Talk to your GP who can refer a person to the appropriate support such as counselling.
- Survivors UK <https://www.survivorsuk.org/> offers a range of support services to men who experienced childhood or adult sexual abuse and have an online helpline <https://www.survivorsuk.org/ways-we-can-help/online-helpline/>
- Call Samaritans helpline on 116 123 free at any time from any phone.
- Contact 'First Step' Local support for male survivors of sexual abuse on 0116 254 8535 <https://firststepleicester.org.uk> Text relay 18001 0116 254 8535.



- Leicester Rape Crisis helpline 0116 255 8852.

More information is available from the NSPCC <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/non-recent-abuse/>

#### **14.12 Support for Staff**

Dealing with safeguarding concerns can result in an impact on the emotions and well-being of staff involved. It is important that anyone affected seeks help if they feel that they need support.

If staff are in need of support, they should be encouraged to discuss this with their Line Manager, HR department or the Club's Safeguarding team.

Advice, guidance and support is also available from our safeguarding team to those individuals whom allegations have been made against.

#### **14.13 Media Protocols**

All media enquiries and communication with the Club from a safeguarding point of view should be directed to the Director of Communications and the Head of Safeguarding.

#### **14.14 Complaints**

Please refer to the complaint's procedure for the relevant Club department where a concern about poor practice does not meet the threshold for safeguarding action.

### **15. MANAGING ALLEGATIONS AGAINST STAFF AND VOLUNTEERS**

All allegations of possible abuse of children or adults at risk will be taken seriously. The following procedure will be followed when there is an allegation or concerns that any member of staff, who works or volunteers with children or adults at risk, in connection with their employment or voluntary activity has:

- Behaved in a way that has harmed, or may have harmed, an adult or child.
- Possibly committed a criminal offence against, or related to, an adult or child.
- Behaved towards an adult or child in a way that indicates they may pose a risk of harm to adults with care and support needs or children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with adults at risk or children.

Staff includes the League's definition of staff which is "any person employed or deployed by a Club or Club Community Organisation whether in a paid, voluntary, consultancy or third-party capacity."

When an allegation is made there are up to three strands to be considered:

- A Police investigation of a possible criminal offence.
- Children's Social Care enquiries and/or assessment about whether a child is in need of protection or services; or Adult's Social Care enquiries and an assessment about whether an adult is in need of support.
- Consideration by an employer of the need for disciplinary action, including undertaking an immediate initial risk assessment.

All allegations or concerns about a member of staff or volunteer should be reported to the Head of Safeguarding immediately. They will take such steps as considered necessary to ensure the safety of the child, young person or adult in question and any other person who may be at risk. If the allegation or concerns are about the Head of Safeguarding this should be reported to the HR Director immediately.

If the thresholds above are met the Head of Safeguarding (or HR Director where the allegation is about the Head of Safeguarding) will make a referral to the Local Authority Designated Officer (LADO)/ Local Authority Person in Position of Trust (PiPoT) Designated Officer and/or the Police the same working day wherever possible. The Senior Safeguarding Lead will be notified and a referral will be made to the relevant League and the FA as soon as possible. If the allegation involves a member of staff from Leicester City in the Community, then a referral may need to be made to the Charity Commissioner.

Where a concern has been identified in relation to an adult at risk, the person with concerns should speak to the adult to ascertain their views and wishes, and to explain that a safeguarding referral will be made. The parent/carer of the child or young person will be contacted as soon as possible, following advice from statutory agencies.

Where the above thresholds are not met the allegation or concerns shall be treated as a poor practice matter which may require possible disciplinary action under the Club's Disciplinary Policy. The Head of Safeguarding will refer cases of poor practice to the relevant League and the FA if it meets the criteria set out in the relevant League and FA Rules.

Where a person is removed from working in a role with children or adults at risk (defined as in regulated activity) a referral will be made to the DBS in accordance with the Clubs legal duty to refer. This includes situations where a person would have been removed but was re-deployed, resigned, retired or left.

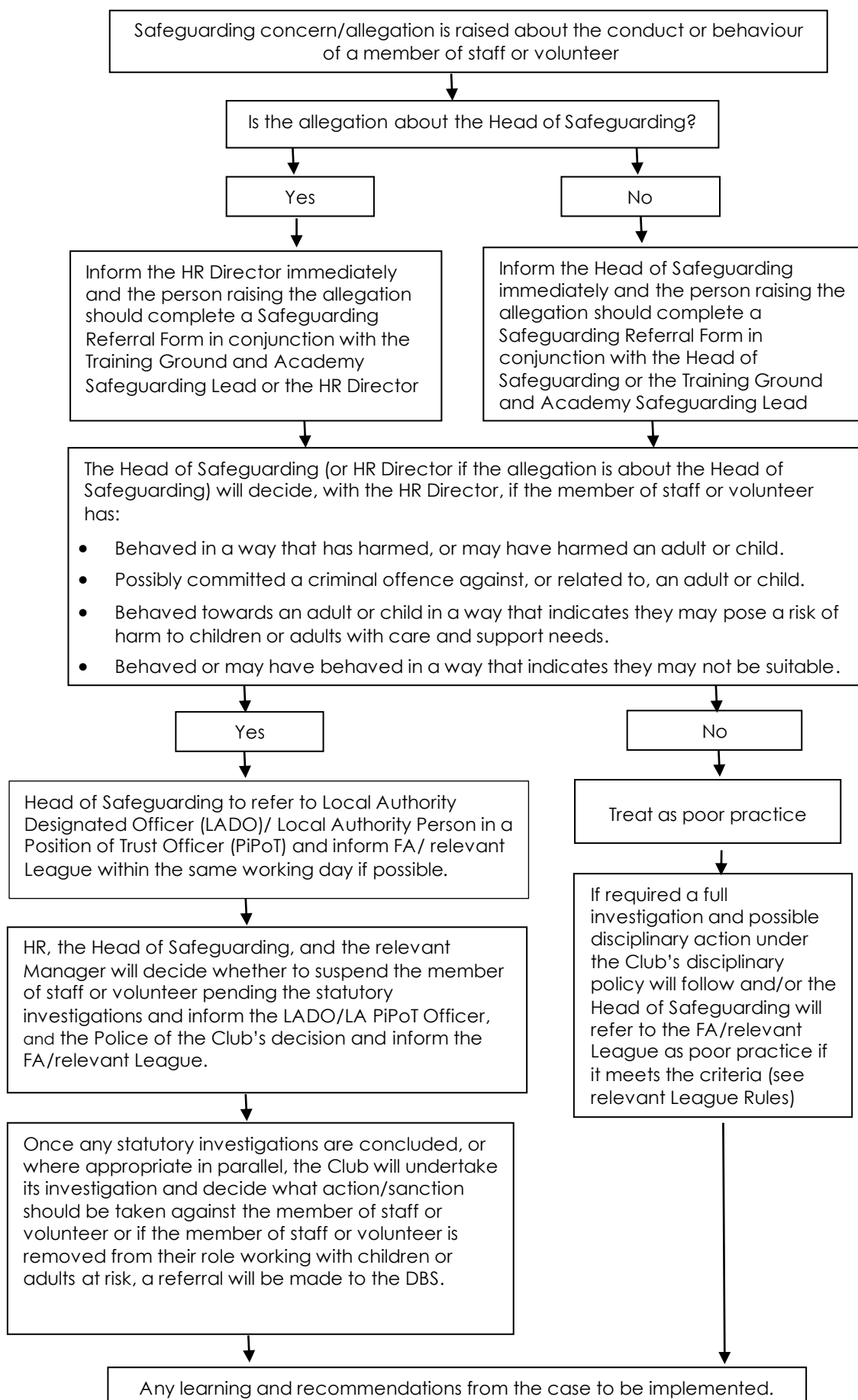
Where an allegation of abuse is made against children or adults at risk this should be dealt with through this policy and should be reported to the Head of Safeguarding immediately. The Head of Safeguarding will seek advice from the local authority on the matter.

All children and adults at risk involved, whether perpetrator or victim will be considered as being at risk. A risk assessment of the situation will be conducted by the Head of Safeguarding with a view to ensuring the safety and best interests of all children and adults at risk involved. Please see Schedule 2 for more information on Peer on Peer and Child on Child abuse.

The procedure for managing allegations is set out in brief in the flow chart on the following page.

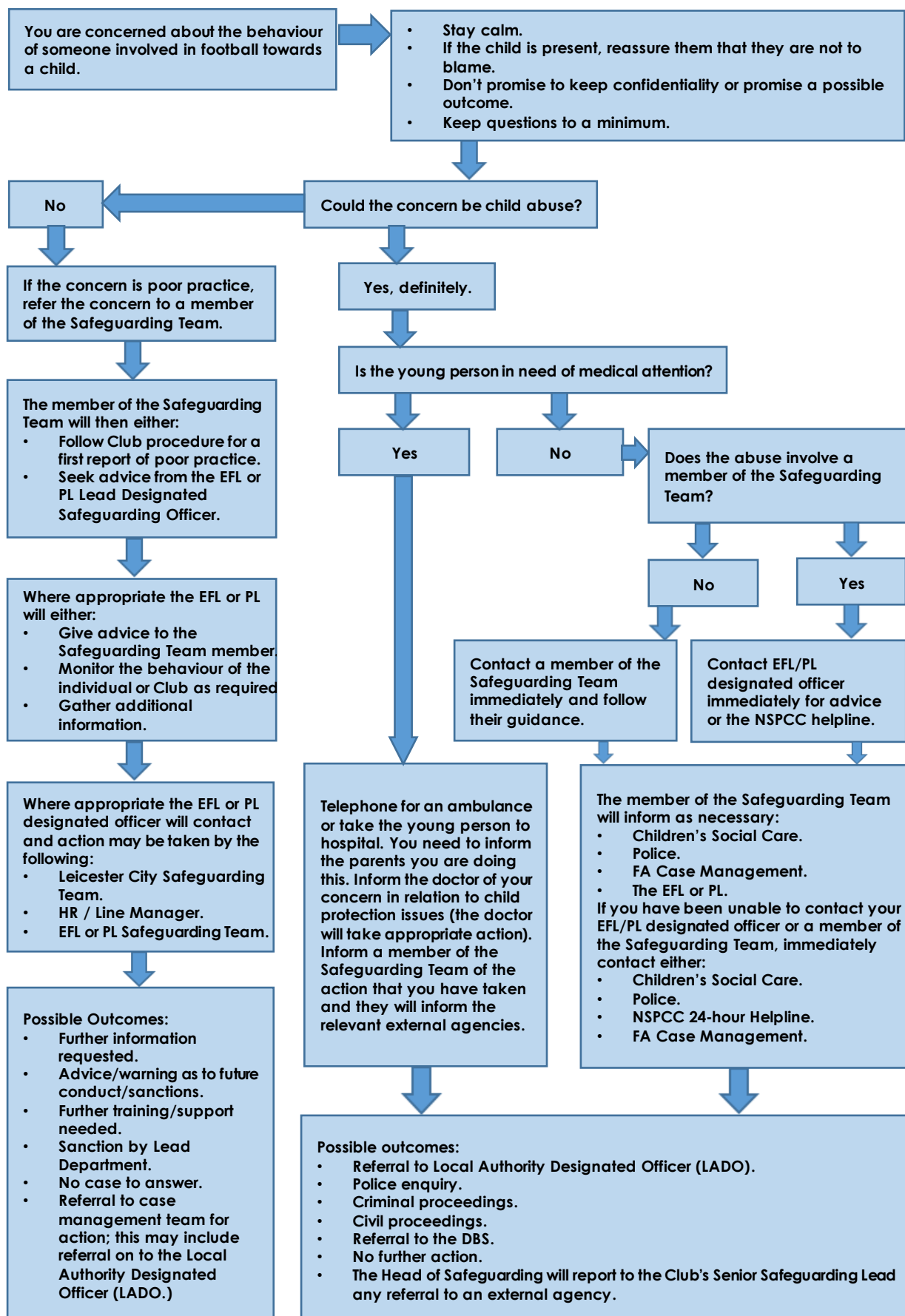
Please also see Schedule 1a and 1b for further information on dealing with concerns in a football setting at Leicester City Football Club.

### Managing Allegations Flowchart



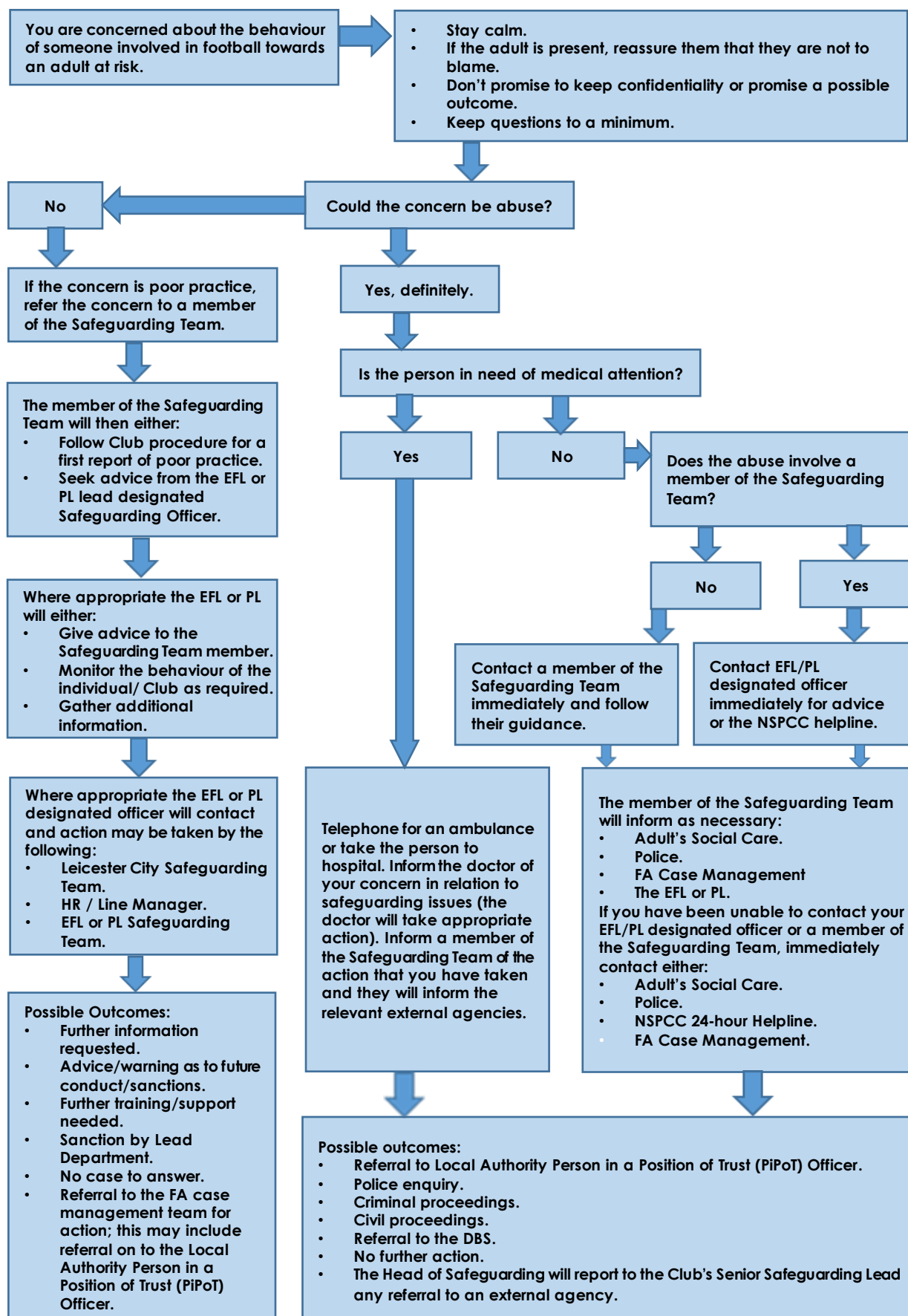
## Schedule 1a

## DEALING WITH CONCERNS IN A FOOTBALL SETTING AT LEICESTER CITY FOOTBALL CLUB (CHILDREN)



## Schedule 1b

## DEALING WITH CONCERNS IN A FOOTBALL SETTING AT LEICESTER CITY FOOTBALL CLUB (ADULTS)



## Schedule 2

### WHAT IS ABUSE AND WHAT THINGS MIGHT RAISE CONCERNS?

#### CHILDREN AND ABUSE

In respect of children, the Football Association of England defines abuse in five categories. These help to explain what abuse and harm are. The categories are based on the Working Together 2018 mandatory guidance published by the UK Government. They also form the foundation of the "International Safeguards" framework and are: neglect, physical abuse, emotional abuse, sexual abuse, and bullying. The Club recognises 'hazing' as a form of abuse; this is a term that originates in the United States but is becoming more widely used.

The Club has adopted this framework together with other recognised areas of abuse in line with current accepted and the relevant League safeguarding practice. The Club also considers that these categories apply to adults at risk in the context of settings/situations akin to adults. Examples relating to both children and adults at risk are included below. In addition, a more detailed explanation of areas of abuse more specific to adults at risk is presented separately below under Adults and Abuse. The Club considers financial abuse and fraud as further risks that may apply to both young professional players and adults at risk.

#### Neglect

Neglect is the persistent failure to meet children's or adults at risk's basic physical and psychological needs, e.g. for food, warmth and clothing, or emotional needs such as attention and affection. It occurs if children or adults at risk are left alone or inadequately supervised or where they are exposed to danger, injury, or extreme weather conditions.

In activities, neglect could occur if children or adults at risk do not have proper supervision, clothing or are allowed or encouraged to play whilst injured. It could occur if a child's or adults' needs are disregarded before, during or after a game or training.

#### Physical Abuse

Physical abuse occurs if people physically hit, burn, poison, shake or in some way hurt or injure children and/or adults at risk, or fail to prevent these injuries from happening.

In sport, physical abuse could happen where training methods are inappropriate for the developmental needs of the child or adult at risk, where they are allowed to play with an injury or where inappropriate drugs or alcohol are offered or accepted, where a child or adult at risk is hit or physically restrained or manhandled by those supervising the game or training session.

It should be noted that only clinical medical officers/consultant paediatricians should diagnose when an injury is non-accidental. It is not the responsibility of staff to determine the cause of injury (except where these are football-related injuries).

#### Emotional Abuse

This is the persistent emotional maltreatment of a child or adult at risk that causes severe and persistent adverse effect on their emotional development.

Examples of emotional abuse include frequent threatening, taunting or sarcastic behaviour, the with-holding of affection by a parent or legal guardian or extreme over-protectiveness. It includes racist or sexist behaviour and demeaning initiation ceremonies. It can be inflicted by other children and peers respectively as well as by adults. Children and adults at risk who are being abused or bullied in any way will also experience emotional abuse.

In sport, coaches or parents emotionally abuse children and adults at risk if they constantly criticise, abuse their power or impose unrealistic pressure to perform to a high standard. It may

also occur if a Club allows members to deride people with disabilities or from minority cultures and use derogatory language about them or to them.

### **Sexual Abuse**

Sexual abuse occurs if children or adults at risk are used to meet another person's sexual needs. This includes any form of sexual behaviour with a child or adult at risk (by an adult [male or female] or another child/peer respectively), the use of sexually explicit language and jokes, inappropriate touching, exposure to pornographic material, being made to watch sexual activities or encouraging children or adults at risk to behave in sexually inappropriate ways.

Sexual abuse can occur in sporting settings, for example, where there is inappropriate touching, where sexually explicit jokes occur between adults and children or adults at risk or if indecent images are taken or adapted, shared and/or placed on child pornography sites.

### **Child Sexual Exploitation (CSE)**

CSE is a form of sexual abuse. It involves exploitative situations, contexts, and relationships where children receive something, e.g., drugs, alcohol, gifts, money. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. Sexual exploitation can take many forms ranging from seemingly consensual relationships where sex is exchanged for affections or gifts, or seriously organised crime from groups or gangs.

Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. (Staff working in the Community are most likely to identify and work with or support children at risk of CSE.)

### **Grooming**

Grooming is defined as developing the trust of an individual for the purpose of sexual abuse, sexual exploitation or trafficking, county lines and child criminal exploitation and radicalisation. Grooming can happen both online and in person.

### **Bullying**

Persistent or repeated hostile and intimidating behaviour e.g. name calling, exclusion or isolation, spreading rumours, threatening to cause harm, physically hurting someone, damaging their possessions and online/cyberbullying.

### **Cyberbullying**

The use of technology to harass, threaten, embarrass, humiliate, spread rumours or target another person. By definition, it occurs among children. When an adult is the victim, it may meet the definition of cyber harassment or cyber stalking.

### **Discriminatory Abuse and Bullying**

Abusive or bullying behaviour because of discrimination occurs when motivated by a prejudice against certain people or groups of people. This may be because of an individual's ethnic origin, colour, nationality, race, religion or belief, gender, gender reassignment, sexual orientation or disability. Bullying behaviour may include unfair or less favourable treatment, culturally insensitive comments, insults and 'banter'.

### **Child on Child and Peer on Peer Abuse**

Children can be taken advantage of or harmed by adults and by other children. Child on child abuse is any form of physical, sexual, emotional and financial abuse and coercive control, exercised between children and within children's relationships (both intimate and non-intimate). Peer on peer abuse may also occur between and within adults at risk relationships.



Peer on peer abuse can take various forms, including: serious bullying (including cyberbullying), relationship abuse, domestic violence, child sexual exploitation, youth and serious youth violence, harmful sexual behaviour, and/or gender-based violence.

### **County Lines and Child Criminal Exploitation**

County lines is the organised criminal distribution of drugs by gangs from the big cities into smaller towns and rural areas using children and adults at risk. Gangs recruit children and adults at risk through deception, intimidation, violence, debt bondage and/or grooming. Gangs also use local property as a base for their activities; this often involves taking over the home of an adult at risk who is unable to challenge them. County line gangs pose a significant threat to children and adults at risk upon whom they rely to conduct and/or facilitate such criminality. Child criminal exploitation is common in county lines and occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology; and it is broader than just county lines, including children being forced to work on cannabis farms or to commit theft.

### **Female Genital Mutilation (FGM)**

FGM comprises all procedures involving the partial or total removal of the external female genitalia or any other injury to the female genital organs for non-medical reasons. FGM is a criminal offence in the UK; it is also a criminal offence for UK nationals or permanent UK residents to take their child abroad to have FGM. FGM is considered to be child abuse in the UK and causes significant harm and constitutes physical and emotional abuse.

### **Forced Marriage/Honour Based Violence**

This is a term used to describe a marriage in which one or both of the parties are married without their consent or against their will. A forced marriage differs from an arranged marriage, in which both parties consent to the assistance of a third party in identifying a spouse. The Anti-Social Behaviour, Crime and Policing Act 2014 make it a criminal offence to force someone to marry. Honour based violence includes assault, imprisonment, and murder where the person is being punished by their family or Community for actually or allegedly undermining what the family or Community believes is the correct code of behaviour and as a result "shaming" or "dishonouring" the family.

### **Radicalisation and Extremism**

Radicalisation: refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism. Identifying someone who is being radicalised or exploited can often be difficult as there is no single pathway to an individual being radicalised. Safeguarding from radicalisation is no different to protecting from other forms of harm. Staff are not expected to be an expert in identifying signs of radicalisation and extremism, but they need to be vigilant and ensure that they respond swiftly and appropriately to any concerns. The following signs could be used as a guide.

- **Vulnerability:**
  - Identity crisis – distance from cultural/religious heritage and feeling uncomfortable with their place in society around them.
  - Personal crisis – family tensions or trauma, sense of isolation, low self-esteem, disassociating from existing friendships.
- **Change in Behaviours:**
  - Using extremist narratives and global ideology to explain personal disadvantage.
  - Vocal support for terrorist attacks (either verbally or written).

- Sharing of views or trying to influence others with extremist ideology to extremism/extremist influences.
- Access to extremism/extremist influences.
- Possesses or is actively seeking to possess and/or distribute extremist literature/other media material likely to incite racial/religious hatred or acts of violence.
- Support for groups with links to extremist activity e.g. propaganda distribution, fundraising and attendance at meetings.

The Club is committed to the Prevent Duty; identifying those who may be at risk of being radicalised is part of this. Children and adults at risk who may be radicalised are not easily identifiable. As with managing other safeguarding risks, staff should be alert to changes in behaviour of a child or adult at risk that could indicate that they may be in need of help or protection. Any concerns of a child or adult being at risk demonstrated by behaviour on or off the pitch, views posted online or concerns from family or friends should be referred to the Head of Safeguarding. Concern does not require any person to carry out any form of investigation but will ultimately be referred to the relevant professional body.

## **ADULTS AND ABUSE**

Club activities may include adults. In particular adults will be present at matchday events, other large scale events and some Community activities. The Club's staff have a duty to refer any concerns they may have about an individual, group or an adult who works with adults who may be vulnerable or at risk of harm.

In the UK, the Care Act 2014 defines the types of abuse related specifically to safeguarding adults at risk, which includes the following:

### **Physical abuse**

This includes assaults, hitting, slapping, pushing, misuse of medication, restraint, or inappropriate physical sanctions.

Indicators may include unexplained injuries or injuries inconsistent with the account given or the person's lifestyle, frequent injuries, subdued or changed behaviour in the presence of a particular person, signs of malnutrition or failure to seek medical treatment.

### **Domestic abuse**

This includes any form of physical, sexual, or emotional abuse (including psychological and/or financial abuse which takes place within the context of a close relationship, in most cases between partners (married, cohabiting or otherwise) or ex-partners. This also includes (i) so called 'honour'-based violence (including assault, imprisonment and murder where the person is being punished by their family or Community for actually or allegedly undermining what the family or Community believes is the correct code of behaviour and as a result "shaming" or "dishonouring" the family); and (ii) forced marriage – where one or both spouses do not (or, in the case of some adults at risk, cannot) consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual and/or emotional pressure.

Indicators may include low self-esteem, physical injuries, fear of outside help, not seeing friends and family or limited access to money.

Research shows that domestic abuse also has an effect on children. For example:

- They may witness physical beatings and violence.

- They may attempt to protect the parent who is affected by the violence and may end up being abused themselves.
- They may be used as accessories in the abuse of the parent.
- A parent's ability to care for a child can be affected when the parent is the victim of domestic violence.

See the Club Policy on Domestic Abuse for further information.

### **Sexual abuse**

This includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

Indicators may include full or partial disclosure that sexual abuse is occurring or has occurred in the past, bruising to thighs or upper arms, bites on various parts of the body, significant change in sexual behaviour or outlook, a woman who lacks the capacity to consent to sexual intercourse becoming pregnant.

### **Psychological abuse**

This covers emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyberbullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.

Indicators may include untypical ambivalence, deference, passivity, resignation, person appears to lack the opportunity to make choices or have adequate privacy, untypical changes in behaviour or routines of daily living, person appears isolated and deprived of social contact.

### **Financial or material abuse**

This includes theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Indicators include general lack of money especially when benefits are claimed, person lacks belongings or services they can clearly afford, inadequately explained fall in living standards, inadequately explained withdrawals from bank accounts, inadequately explained inability to pay bills, person does not appear to possess items which are known to have been purchased, recent acquaintances expressing interest in the person or money, inadequately maintained financial systems when a person's money is being managed by others including a failure to produce receipts for major items, unexplained change in appointeeship or agent.

### **Neglect and acts of omission**

This includes ignoring medical, emotional, or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

Indicators may include person living in accommodation which falls below minimum practical standards, person has inadequate heating and/or lighting, failure to obtain health services when the person is ill, person does not appear to be taking the prescribed medication, callers/visitors refused access to the person.

**Self-neglect**

This covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

**Modern slavery**

This encompasses slavery, human trafficking, forced labour and domestic servitude. See the Anti-Slavery and Human Trafficking Policy for more information.

**Discriminatory abuse**

This includes forms of harassment, slurs or similar treatment because of race, gender and gender identity, age, disability, sexual orientation, or religion.

**Discriminatory behaviour**

This is unfair or less favourable treatment due to a person's ethnic origin, colour, race, nationality, religion or belief, gender, gender reassignment, sexual orientation, or disability. This may include abuse, "banter", jokes, culturally insensitive comments, and insults.

**Organisational abuse**

This covers neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home.

**Mate Crime**

A "mate crime" is when "vulnerable people are befriended by members of the community who go on to exploit and take advantage of them". It may not be an illegal act, but it still has a negative effect on the individual. A mate crime is carried out by someone the adult knows, and it often happens in private. In recent years there have been a number of Serious Care Reviews relating to people with a learning disability who were seriously harmed, or even murdered, by people who purported to be their friend.

Further information is available from the Head of Safeguarding if required and [www.scie.org.uk/adults/safeguarding/](http://www.scie.org.uk/adults/safeguarding/)

**SIGNS AND INDICATORS OF ABUSE**

Children and adults at risk may be reluctant to tell someone when they are being abused, so it is essential that every member of staff is aware of the possible signs and indicators that a child's or adult at risk's welfare or safety is being threatened. However, there is rarely a clear sign and you may often have to piece together various snippets of information and rely on your instincts that something does not seem quite right. Never allow a child's or adult at risk's disability or cultural difference to explain away concerns.

You may have one piece of information that when added to that of others, forms a clear picture of abuse. This is often compared to fitting pieces of a jigsaw together. Only when you have a few pieces can you start to see the true picture. Remember, it is not your job to decide whether or not a child or adult at risk is being abused - however it is your responsibility to share your concerns.

**POOR PRACTICE**

This is behaviour that falls short of abuse but is nevertheless unacceptable. It is essential that poor practice is challenged and reported even where there is a belief that the motives of the individual are well-meaning. Failure to challenge poor practice can lead to an environment where abuse is more likely to remain unnoticed. Incidents of poor practice occur when the needs of children and adults at risk are not afforded the necessary priority, compromising their

welfare, e.g., allowing abusive or concerning practices to go unreported, placing children and adults at risk in potentially compromising and uncomfortable situations, failing to ensure the safety of children and adults at risk, ignoring health and safety guidelines, giving continued and unnecessary preferential treatment to individuals.

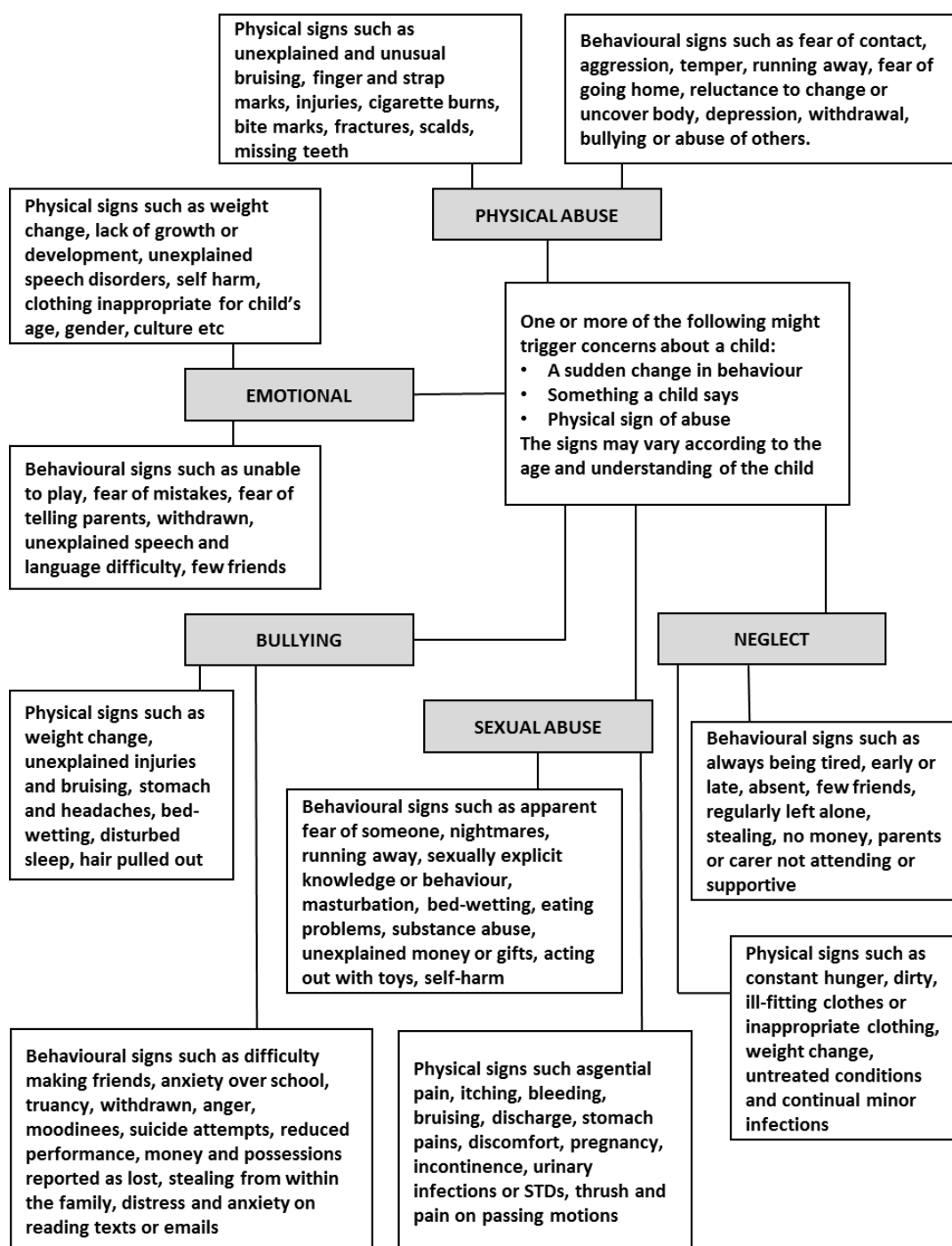
Examples of poor practice include:

- Unnecessarily spending excessive amounts of time alone with children or adults at risk away from others.
- Being alone in changing rooms, toilet facilities or showers used by children and adults at risk.
- Taking children or adults at risk alone on a car journey, however short.
- Sharing a room with a child or adult at risk.
- Engaging in rough or physical play, including horseplay.
- Reducing a child to tears as a form of control.

### **POSSIBLE SIGNS OF ABUSE (CHILDREN)**

The following diagram (from The FA Child Protection and Best Practice) shows some possible signs of abuse. Some signs are explicit and specific to the type of abuse; others are much more general. However, you need to be careful as there may be another very plausible explanation, e.g. death in the family, a new baby, loss of pet, problems at school.

**You should raise your concerns if there is a combination of unexplained changes over a period of time.**



## POSSIBLE SIGNS OF ABUSE (ADULTS)

The possible signs of abuse for children in the diagram above may also be of general application to adults at risk in the context of settings/situations akin to adults.

There are many signs and indicators that may suggest an adult is being abused or neglected. These include but are not limited to:

- Unexplained bruises or injuries – or lack of medical attention when an injury is present.
- Person has belongings or money going missing.
- Person is not attending / no longer enjoying their sessions. you may notice that a participant in a team has been missing from practice sessions and is not responding to reminders from team members or coaches.
- Someone losing or gaining weight / an unkempt appearance. this could be a participant or player whose appearance becomes unkempt, does not wear suitable sports kit and deterioration in hygiene.
- A change in the behaviour or confidence of a person. For example, a participant may be looking quiet and withdrawn when their family member/friend comes to collect them from sessions, in contrast to their personal assistant whom they greet with a smile.
- They may self-harm.
- They may have a fear of a particular group or individual.
- They may tell you / another person they are being abused – i.e., a disclosure.
- Harassing of a club member because they are or are perceived to have protected characteristics.
- Not meeting the needs of the participant. E.g., this could be training without a necessary break.
- A coach intentionally striking an athlete.
- This could be a fellow participant who sends unwanted sexually explicit text messages to a learning disabled adult they are training alongside.
- This could be a participant threatening another participant with physical harm and persistently blaming them for poor performance.

Further details about the signs and indicators that are specific to different forms of abuse that may be experienced by adults are included above under Adults and Abuse and the section on Children and Abuse.



### Schedule 3

#### SOME USEFUL TELEPHONE NUMBERS

**Contact details for the Head of Safeguarding and Designated Leads can be found on the Club's website.**

Leicester City Children's Services and Early Help  
**0116 454 1004**

Leicestershire First Response Children's Duty Team  
**0116 305 0005**

Leicester City Local Authority Designated Officer (LADO)  
**0116 454 2440**

Leicestershire Local Authority Designated Officer (LADO) Allegations Line  
**0116 305 4141**

Leicester Safeguarding Children Partnership (LSCP)  
**0116 454 6520**

Leicestershire & Rutland Safeguarding Children Partnership  
**0116 305 7130**

Leicester City Adult Services Emergency Duty Team  
**0116 454 1004** (During office hours)

Leicestershire Adult Services  
**0116 305 0004** (During office hours)

Leicester/Leicestershire & Rutland (Adults)  
**0116 255 1606** (Outside office hours)

Safeguarding Adults Boards  
Leicester City **0116 454 6270**  
Leicestershire & Rutland **0116 305 7130**

Leicestershire Police  
**0116 222 2222**

For online safety:

[www.ceop.gov.uk](http://www.ceop.gov.uk)

[www.thinkuknow.co.uk](http://www.thinkuknow.co.uk)

Club HR Director  
Liam Dolan-Barr  
**07936 364230**

EFL Championship League **01772 325490**  
**safeguarding@efl.com**

The Football Association (The FA)/NSPCC  
Child Protection Helpline  
**0808 800 5000**

Child protection in Sport Unit  
**0116 366 5626**

Ann Craft Trust (Safeguarding Disabled Children and Adults at Risk)  
**0115 951 5400**

Respond – Service for adults with Learning Disabilities  
**0207 383 0700**  
**0808 808 0700** (Institutional abuse helpline)

Forced Marriage Unit  
**0207 008 0151**

'First Step' Support for male survivors of sexual abuse  
**0116 254 8535**

NAPAC (National Association for People Abused in Childhood)  
**0808 801 0331**

Leicester Rape Crisis helpline  
**0116 255 8852**

Samaritans (free, anytime)  
**116 123**

Childline  
**0800 1111**

## Schedule 4

### LEICESTER CITY FOOTBALL CLUB SAFER RECRUITMENT AND DBS POLICY

#### Introduction and Rationale

This policy has been developed to embed safer recruitment practices and procedures throughout “the Club” and to support the creation of a safer culture by reinforcing the safeguarding and wellbeing of children and adults at risk that come into contact with the Club. This policy complements and builds on the Club's Safeguarding Policy and Processes and ensures that the Club's recruitment and selection practices and procedures comply with recognised good practice in safer recruitment.

This policy is an essential element in developing and maintaining a safe and positive environment for all individuals and members of the community who come into contact with the Club and aims to ensure both safe and fair recruitment and selection of all staff by:

- Attracting the best possible people to vacancies.
- Deterring prospective people who are unsuitable from applying for vacancies. From the beginning of the recruitment process, it is important to send the right message that the Club has a rigorous recruitment process and does not tolerate any form of abuse. Wording in adverts and recruitment information must aim to deter potential abusers.
- Identifying and rejecting those people who are unsuitable to work with children and adults at risk. It will not always be possible to deter potential abusers. Therefore, careful planning for the interview and selection stage, in terms of asking the right questions, setting appropriate tasks and obtaining the right information can assist in finding out who is suitable for the role and who is not.
- Preventing and rejecting those people who are unsuitable to work with children and adults at risk. There are no guarantees that even the most robust safer recruitment process will prevent an inappropriate appointment. However, this does not mean it is too late to act. Ensuring that comprehensive induction processes are in place, together with appropriate policies and procedures, raising awareness through staff training and generally developing and maintaining a safe culture within the Club will all help to prevent abuse or identify potential abusers.

The intention of this policy is to ensure that all stages of the recruitment process, and beyond, contain measures to deter, identify, prevent and reject unsuitable people from gaining access to children and adults at risk who come into contact with the Club.

This policy covers all staff (whether employed or deployed directly by the Club or Club Community Organisation or through partnership working, commissioned services, consultancy or a third-party capacity, paid or unpaid) and in particular:

- Individuals who are in ‘Regulated Activity’ undertaking supervisory roles with children and adults at risk who require an Enhanced DBS with or without Barred List Check.
- Individuals who may come into regular contact with children and adults at risk in their role whether or not they will be in a supervisory role who require either an Enhanced with or without Barred List Check or a Standard DBS check.
- Individuals with access/opportunity for regular or occasional contact with children and adults at risk because of their role who require a Basic DBS Check.

The Club is responsible for continuing vigilance in relation to all staff. Any change of role will require a reassessment of DBS/vetting requirements and outcomes by the Head of Safeguarding.

### **Recruitment Policies and Procedures**

The LCFC Safer Recruitment Process is outlined in Appendix A of this policy. It demonstrates the Club's commitment to safeguarding in recruitment and selection and the embedding of safeguarding in the Club's recruitment and selection processes and procedures.

To fulfil the Club's commitment to safeguarding in recruitment and selection, the Club will, under the terms of this policy, the Club's recruitment and selection policies and procedures and in line with the LCFC Safer Recruitment Process:

- Ensure all adverts for vacancies have a clear statement of the Club's commitment to safeguarding.
- Ensure all roles have a job description which clearly defines the role and the extent of the duties to assist in identifying the appropriate level of DBS check, if any.
- Ensure all roles have a person specification which sets out the qualifications, knowledge, skills, abilities and any requirement for a DBS check for the particular role.
- Require the completion of a standardised Club application form for all vacancies.
- Conduct an interview process which assesses the applicant's suitability for the particular role, their attitude towards children and adults at risk and their ability to perform the role. Recruitment and selection training is mandatory for all staff involved in the recruitment and selection process.
- In line with the relevant League Rules, obtain at least two written references for all posts with regular/occasional contact or influence over children and adults at risk. References will be followed up before a post is offered and one reference should be from the last employer or from an organisation which has knowledge of the applicant's work or volunteering with children and adults at risk.
- Require the completion of a Self-Declaration Form as appropriate to the role which requires staff to disclose any convictions, cautions, reprimands or warnings as part of the recruitment process and imposes an ongoing obligation to disclose any that arise during the course of employment, in order that appropriate safeguards are put in place.
- Ensure all relevant pre-employment checks are completed for prospective new starters including right to work checks, the validation of any essential qualifications, a DBS check (and relevant barred list check where appropriate) for all eligible roles, overseas checks/certificate of good conduct (where applicants have worked or resided outside the UK for 3 months or more in the last five years and were aged 16 or over at the time) and identity checks.
- Maintain a risk profile of posts that involve working with children and adults at risk and will therefore be subject to appropriate DBS checks for their role.
- Ensure that, when a positive disclosure is received or issues are raised in the references and pre-employment checks, the appointment decision is made by the respective Department Manager in conjunction with the Head of Safeguarding after carrying out a risk assessment process (See DBS policy below).

- Ensure that prospective employees do not commence working at the Club until full clearances of all relevant pre-employment checks have been received and verified. Any decision for employment with children and adults at risk to commence prior to receipt of full pre-employment checks can only be taken by the Head of Safeguarding in conjunction with the respective Department Manager.
- Routinely renew DBS checks regularly for all roles that are eligible for a check. This will include completing a new Self Declaration Form when a DBS is renewed.
- Where a Club member of staff has been safely recruited for a new role in the Club: if they have a DBS, ensure that it is relevant for that role and if not then a new DBS will be required. A Self Declaration Form will also need to be completed.
- For relevant posts, ensure the completion of a declaration that a person is not disqualified under childcare disqualification requirements set out in the Childcare Act 2006 and the Childcare Disqualification Regulations 2009 as amended.

### **Safeguarding Induction**

Induction is an integral part of the recruitment process. Good recruitment and selection procedures help to ensure that the best person is appointed to the role, but it is equally important to induct staff properly on commencement of their role.

The Club will ensure all staff working with children and adults at risk (whether employed or deployed directly by the Club or Club Community Organisation or through partnership working, commissioned services, consultancy or a third party capacity, paid or unpaid) complete a safeguarding induction delivered by the Club Head of Safeguarding or the respective Safeguarding Lead which is specific to their role to ensure that they understand their responsibilities for safeguarding and how to report any concerns.

### **Volunteers**

Children and adults at risk will see volunteers within the Club in the same way as its other staff. They will not know that they are unpaid and will assume they are safe and trustworthy adults, just like anyone else within the Club environment. Therefore, volunteers should also be subject to the same checking processes as any other member of staff to ensure that they are indeed safe to be in contact with children and adults at risk. It is important to ensure that volunteering does not allow an easier route into the Club for potentially unsuitable people.

Where a volunteer is likely to have an ongoing role that includes regular/occasional contact with children and adults at risk, then a similar recruitment and selection process will be applied as would be used to recruit an employee or worker. The process may be presented in a less formal manner but the principles of safer recruitment are the same and this policy shall apply accordingly.

Where volunteers are recruited from another institution or organisation, written assurances must be obtained from the establishment concerned that the individual has been subject to a proper recruitment process that includes the necessary safeguards as is required for any other worker employed or deployed through partnership working or commissioned services (see below).

### **Partnership Working and Commissioned Services**

The Club takes its responsibilities for safer recruitment seriously. In order to ensure the safety and welfare of children and adults at risk, it is essential that partners and commissioned services also adopt robust recruitment and vetting procedures that minimise the risk of employing unsuitable people.

The Club will actively promote safeguarding within all partnership working and commissioned services involving children and adults at risk and will seek to establish minimum safeguarding standards by assessing the partner or external provider's suitability, ensuring that they have appropriate safeguarding policies and procedures in place and determining how any safeguarding concerns that may subsequently arise will be managed. In addition, partners and commissioned services will be required to provide written assurances about their recruitment and selection practices and, in particular, that workers deployed by them, where such individuals will be in Regulated Activity and/or have regular/occasional contact with children and adults at risk, have been subject to similar checks and safeguards as are in place for new employees and workers taken on directly by the Club as set out in this policy. Such considerations must be made explicit in any contract or service level agreement with any partners or external providers. The Head of Safeguarding must draft/approve the safeguarding clauses of any contract or service level agreement prior to such clauses being approved by the Club's Legal Counsel and HR Director.

Where the delivery by a partner or external provider involves working with those that are particularly vulnerable, additional considerations will need to be addressed to ensure that the contract or service level agreement ensures a thorough safeguarding risk assessment is undertaken and sufficient protection for all staff and children and adults at risk is in place. Conversely where delivery by Club staff on behalf of/in conjunction with a partner or external provider involves working with those that are particularly vulnerable, the same considerations will need to be addressed to ensure that proper arrangements are made by our partners in the contract or service level agreement for the safety and welfare of our staff.

## **DBS POLICY**

### **General Principles**

As an organisation using the Disclosure and Barring Service (DBS) checking service through The FA to help assess the suitability of applicants for positions which meet the eligibility criteria for a DBS check, the Club complies fully with the code of practice regarding the correct handling, use, storage, retention and disposal of certificates and certificate information. It also complies fully with its obligations under the Data Protection Act 2018, General Data Protection Regulation and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of certificate information and has a written policy on these matters, which is available to those who wish to see it on request.

#### **1. Storage and Access**

Certificate information will be kept securely, in lockable, non-portable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties.

#### **2. Handling**

In accordance with section 124 of the Police Act 1997, certificate information is only passed to those who are authorised to receive it in the course of their duties. We maintain a record of all those to whom certificates or certificate information has been revealed and it is a criminal offence to pass this information to anyone who is not entitled to receive it. Once the inspection has taken place, the certificate will be returned to the applicant and any certificate information will be destroyed in accordance with the code of practice.

#### **3. Usage**

Certificate information is only used for the specific purpose for which it was requested and with the full knowledge and agreement of the applicant.

#### 4. Retention

Once a recruitment (or other relevant) decision has been made, we do not keep certificate information for any longer than is necessary. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints. If, in very exceptional circumstances, it is considered necessary to keep certificate information for longer than six months, we will consult the DBS about this and will give full consideration to the data protection and human rights of the individual before doing so. Throughout this time, the usual conditions regarding the safe storage and strictly controlled access will prevail.

#### 5. Disposal

Once the retention period has elapsed, we will ensure that any DBS certificate information is immediately destroyed by secure means, for example by shredding, pulping or burning. While awaiting destruction, certificate information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack). We will not keep any photocopy or other image of the certificate or any copy or representation of the contents of a certificate. However, notwithstanding the above, we may keep a record of the date of issue of a certificate, the name of the subject, the type of certificate requested, the position for which the certificate was requested, the unique reference number of the certificates and the details of the recruitment decision taken.

### FA DBS Checks

The Club conducts DBS checks for all eligible roles through the FA. FA DBS checks are preferred by the Club as there is an assessment of suitability in football by The FA in addition to the decision by the Club as employer for the particular role. In accordance with the Club's policies and processes, all staff or anyone delivering any sessions on behalf of the Club who is eligible for a DBS check, is required to obtain an FA DBS through the Club which is accepted by The FA and approved by the Club Head of Safeguarding on behalf of the Club. The decision as to eligibility for a DBS will be made by the Head of Safeguarding. The only exceptions are set out below.

A previous FA DBS check dated within the last three years can be accepted by the Club unless there is a change of address after the date of the check or there is a positive disclosure. When accepting a previous FA DBS Certificate, the candidate's identity will be validated (name, address and date of birth) and a Club Self-Declaration Form will be required. If there is a change of address or there is a positive disclosure, a new DBS check through the Club will be required. The Head of Safeguarding will determine whether a previous FA DBS check can be accepted.

**NOTE:** If any delivery is one-off and there is no eligibility for a DBS check, adequate supervision will be required, in line with official guidance, which should be agreed by the Head of Safeguarding or a Designated Safeguarding Lead in advance of any delivery. This should not be used for a series of one-off's or to delay/avoid the DBS checking process.

### DBS Checks by other National Governing Bodies (NGB)

Where there is no contract or service level agreement and an independent coach is engaged to deliver any sessions on behalf of the Club, a DBS disclosure certificate dated within the last 12 months undertaken by another NGB may be accepted ONLY IF the delivery is for a sport other than football and the sport is covered by the NGB who carried out the previous DBS check.

When accepting a previous NGB DBS Certificate, the candidate's identity will be validated (name, address and date of birth) and a Club Self-Declaration Form will be required. If there is a change of address or there is a positive disclosure, a new DBS check through the Club will



be required. The Head of Safeguarding will determine whether a previous NGB DBS check can be accepted.

### **DBS Checks by Other Organisations**

In the absence of a contract or service level agreement, all staff provided by other institutions or organisations will be subject to the Club's recruitment and selection processes including all DBS/vetting requirements in accordance with this policy. In these circumstances a DBS check carried out by other organisations will not be accepted by the Club.

Where there is an agreed contract or service level agreement between the Club and a partner organisation, setting out the DBS/vetting requirements and safeguarding obligations in accordance with this policy which have been drafted/approved by the Head of Safeguarding, a previous DBS certificate obtained through the partner organisation can be accepted in line with the arrangements under the contract or service level agreement. The Head of Safeguarding will determine whether a previous DBS check can be accepted.

Under the contract or service level agreement, the partner organisation will be required to provide the details of all approved DBS checks to the Head of Safeguarding or the respective Safeguarding Lead including the level of check, the name of the issuing/registered body, the certificate date and certificate number and the identity will be validated (name, address and date of birth) prior to any individual coming into contact with children or adults at risk.

### **Positive Disclosures and Risk Assessments**

The term "positive disclosure" refers to a disclosure containing information relating to convictions, cautions, reprimands and so on, plus "soft information" relating to non-convictions but which the police deem as relevant. Where there is a positive disclosure or issues are raised in the references and pre-employment checks concerning either job applicants or those employed directly by the Club or Club Community Organisation or deployed through partnership working or commissioned services, paid or unpaid, the risk assessment process in the Club's Safer Recruitment Procedure will be followed.

In accordance with the Safer Recruitment Procedure, the Head of Safeguarding shall gather information and complete a risk assessment in conjunction with the respective Department Manager and an employment decision will be made with appropriate safeguards in place or the offer of employment withdrawn.

To aid the decision-making process, it may be appropriate for the Head of Safeguarding to interview the applicant to verify the information received, prior to any judgements being made.

The assessment of the positive disclosure will be in accordance with the following checklist:

- The likely impact that the positive disclosure could have on the individual's ability to carry out the job role.
- The seriousness and nature of the offence(s)/information.
- The nature of the appointment.
- The length of time since the offence(s) occurred.
- The number and pattern of offence(s).
- The applicant's age at the time.



- Any explanation of the circumstances of the offence(s)/information that may already have been given.
- Concealment of the offence(s)/information at the application stage/non-disclosure of offence(s) that occurred during employment.
- Whether appropriate safeguards can be put in place.

Where appointment or continued employment of an individual with positive disclosures proceeds, the record of decision will be retained permanently on the individual's personnel file and the DBS disclosure information will be retained securely for up to six months from the decision being made, in accordance with the DBS Code of Practice.

The following details of all DBS and vetting checks will be maintained for all staff (whether employed or deployed directly by the Club or Club Community Organisation or through partnership working, commissioned services, consultancy or a third-party capacity, paid or unpaid) on the Club's Single Central Record:

- Date of issue of a Disclosure.
- Certificate number of the Disclosure.
- Type of Disclosure requested and whether it included a Barred List Check.
- Position for which the Disclosure was requested.
- Outcome of any risk assessment and when/who carried out the risk assessment.

### **Ongoing Vigilance and Commitment to Safeguarding**

It is never sufficient to assume that a safer recruitment and selection process and robust induction arrangements are enough to ensure that children and adults at risk are safe and that there is no risk to them within the Club environment. Creation of a safe culture, with ongoing vigilance is essential.

The Club will continue to strive to create and maintain a safer culture by:

- Having in place and putting into practice clear policies and procedures and ensuring that all employees, workers and volunteers are aware of and understand them.
- Setting acceptable standards of behaviour.
- Having in place clear procedures for reporting concerns, ensuring that all staff know what the procedures are and their responsibility for following them.
- Taking concerns seriously and providing support to individuals raising them.
- Taking appropriate action in relation to concerns raised.
- Having in place robust and appropriate induction arrangements.
- Ensuring that all staff undertake safeguarding and other relevant training on a regular basis.
- Keeping the commitment to safeguarding children and adults at risk on the agenda through regular discussion and cross departmental meetings with key staff with responsibilities for safeguarding, training sessions and so on.
- Learning from experience.
- Never thinking that enough has been done to ensure a safe culture.

## Appendix A

## RECRUITMENT PROCESS

## Human Resources (HR)

- Decision made to recruit after consideration of:
  - Internal progression opportunities.
  - Creative role solution / distribution of workload.
  - Job design.
  - Receipt of budget approval (*essential*).
- Job Description and advert formulated by Recruiting Manager (RM) and submitted for approval via staff request process.

- *Once role fully approved, HR to inform SG if DBS check is identified as a potential requirement by RM or HR.*
- *HR to add DBS statement into JD & advert.*

- Advert placed live internally for 1 week, following this period advert placed externally on LCFC careers page and other appropriate outlets as agreed with RM.
- HR to notify internal staff of new vacancies.

Advert

- All applications reviewed by RM & one other manager.
- RM to confirm a list of shortlisted candidates and provide an interview schedule to HR.
- HR to send out formal invite to candidates.

Interview takes place with a minimum of two panel members (*lead panel member must be signed off with interview skills training*).

- All interview notes and confirmation of appointed candidate details to be sent to HR following interview process.

- HR to send formal offer letter, details of all pre-employment checks required and supporting documents to appointed candidate.
- *If DBS required, HR to send appropriate self-declaration form to candidate & advise SG of candidate's information and intended start date.*

- HR carry out pre-employment checks required for the role (*right to work, references, qualifications etc.*).

Pre-employment checks completed.

- HR to inform RM and agree start date with candidate.
- HR to arrange employee Club Induction once RM confirms start date.

Club induction delivered to all new employees within first month of their employment. SG team to deliver SG induction as part of the Club Induction, or on first day if role critical.

## Safeguarding (SG)

SG team to review JD and to confirm to HR via email what level of DBS and self-declaration form is required for the role, before advert goes live.

SG team to contact candidate to arrange completion of DBS check.

SG to confirm DBS result with HR and to ensure self-declaration form has been received from candidate.  
SG to alert HR if any reason to not employ candidate prior to start date.

## Schedule 5

### SAFE ENVIRONMENT AWAY FROM THE CLUB AND ONLINE SAFETY

The Club will provide a safe environment for children and adults at risk when they are away from the Club, including online. Therefore, staff should carefully risk assess any activities that are expected to be completed in the home and must follow the guidance set out below for any online contact with children and adults at risk.

The Club will ensure that appropriate filtering and monitoring systems are in place to protect children and adults at risk when they are online on the Club's IT systems or recommended resources.

Staff should be aware that the risks that are present in a physical setting are equally present in an online setting. However, there are added risks that are associated with a virtual setting which include online grooming, online radicalisation, harmful content, cyberbullying and child on child/peer-on-peer abuse.

It is important that all staff who interact with children and adults at risk, including online, look out for signs a child or adult may be at risk. Staff should be aware that communicating online may allow a view into a child's or adult's world that would not have been seen before. Any concerns must be reported to a Designated Safeguarding Lead or the Head of Safeguarding immediately.

Staff must consider the following points when planning any online contact with children and adults at risk especially where webcams are involved to help protect and safeguard both children, adults at risk and staff:

- It is recommended that any online contact is with groups of children or adults rather than one-to-one.
- Staff should keep a written log of the length, time, date and attendance of any online contact/communication. Recording and/or screen capture is not advisable as there are issues of consent and GDPR/data security.
- Staff must wear suitable clothing during any online contact.
- Any computers used should be in appropriate areas, for example, not in bedrooms; and where possible be against a neutral background.
- Staff must use language that is professional and appropriate.
- All online contact should follow the same expected standards of behaviour from staff and children/adults at risk as any other contact in a physical setting.
- Live classes and online activities should be kept to a reasonable length of time to ensure that it does not unduly interfere with the rest of the family or other routines/activities.
- The frequency of any online contact should balance the needs of the child or adult at risk and the rest of the family or other routines/activities.
- Consider activities carefully when planning as online access within the Club will have internet content filtering systems in place that are unlikely to be replicated in the home environment.
- Where possible staff should use equipment and platforms provided by the Club to communicate with children and adults at risk (for example HUDL).
- Staff must ensure that any teaching/learning software and/or platforms are suitable for the age group (for example users must be 16 or over to set up an account on Zoom).

- Staff must ensure any use of online learning tools and systems is compliant with privacy and data protection/GDPR requirements (Staff should seek guidance from the Head of IT if in any doubt).
- If it is considered essential to have one-to-one contact with children additional safeguards should be in place which must include ensuring that a parent is present. Any one-to-one contact with adults at risk must include ensuring that an appropriate adult is present.
- All contact should be optional for the child/family or adult at risk.

Parents and children can be signposted to age-appropriate online information and support. These include:

- [Childline](#) - for support.
- [CEOP](#) - for advice on making a report about online abuse.
- [Internet matters](#) - for support for parents and carers to keep their children safe online.
- [London Grid for Learning](#) - for support for parents and carers to keep their children safe online.
- [Net-aware](#) - for support for parents and careers from the NSPCC.
- [Parent info](#) - for support for parents and carers to keep their children safe online.
- [Thinkuknow](#) - for advice for parents and children of all ages from the National Crime Agency to stay safe online.
- [UK Safer Internet Centre](#) - advice for parents and carers and to report and remove harmful online content.

## Reviews and Approval of the Safeguarding Policy

Policy Agreed	Date:	26 June 2017 Version 1.0
Review of Policy by	Name:	Dale Bradshaw, Head of Safeguarding Sally Wan, Safeguarding and Welfare Officer
Policy Updated	Date:	July 2018 Version 1.1 September 2018 Version 1.2
New Policy Approved	Date:	26/9/2019 Version Number 2.0
Review of Policy by	Name:	Sally Wan, Head of Safeguarding
New Policy Approved	Date:	September 2020 Version Number 2.1
Review of Policy by	Date:	Sally Wan, Head of Safeguarding
Revised Policy Approved	Date:	August 2022, Version Number 2.2
Review of Policy by	Date:	Beverly Huff, Head of Safeguarding June 2023
Revised Policy Approved	Date	(add month) 2023, Version Number 2.3

## History of Revisions to the Safeguarding Policy

Version/Date	Page/section reference	Summary of changes
1.1/July 2018	Data Protection pages 6-7	Ensuring terminology and policy is in line with GDPR and Data Protection Act 2018
1.1/July 2018	Staff Recruitment page 11	Review of Staff recruitment section to be in line with other policies on recruitment
1.1/July 2018	Schedule 4 pages 21-27	The addition of a Safer Recruitment and DBS Policy to fully align safer recruitment and HR
1.1/July 2018	Schedule 2 pages 15-19	The definitions of abuse have been updated in line with current safeguarding practice and include peer on peer abuse and FGM
1.1/July 2018	Schedule 3 page 20	The useful telephone numbers have been checked and updated
1.2/Sep 2018	Throughout Policy	Adoption of new Premier league terminology adult at risk replaces vulnerable adult throughout the Policy. Additionally, the Policy was reviewed to include more specific references to adults at risk particularly in schedule 2 under Adults and Abuse
1.2/Sep 2018	Schedule 2 pages 17-23	The definitions of abuse in Schedule 2 have been updated in line with new Premier League Guidance for Safer Working Practice
1.2/Sep 2018	Introduction page 3	The new Premier League definition of staff has been updated in line with new Premier League Guidance for Safer Working Practice
2.0/Aug 2019	Contents pages 2-3	Addition of a Contents page to allow easy navigation through the Policy based on feedback from NSPCC and Barnardo's
2.0/Aug 2019	Foreword page 4	Revised Foreword by CEO
2.0/Aug 2019	Introduction page 5	Reference to various external agencies consulted, how often the Policy will be reviewed and Policy issued to Local Authority and Premier League

2.0/Aug 2019	Section 3 page 7, schedule 1b page 25, schedule 2 pages 26-33 and various other pages	Addition of dedicated section on Adult Safeguarding and more specific references to adults throughout the policy and in Schedule 1b and Schedule 2 to fully embed safeguarding for adults at risk in the Policy based on feedback from Ann Craft Trust
2.0/Aug 2019	Section 8.3 page 13	Additional section to be explicit in relation to policy on lone working situations in response to the Premier League Charitable Fund Code of Practice
2.0/Aug 2019	Section 12 page 16	More detail on the scope of staff training to support the feedback/recommendations from Barnardo's
2.0/Aug 2019	Section 14 pages 16-21	Raising Concerns section revised based on feedback from NSPCC and Ann Craft Trust and recommendations from Barnardo's including 14.2 FA/NSPCC Whistleblowing Helpline added, 14.4 reference to section on the process for allegations in respect of staff, 14.5 reference to the electronic case management system, 14.6 Guidance for staff on responding to concerns and disclosures added, 14.8 Preservation of evidence section added, 14.10 application of Safeguarding reporting procedures to any prevent concerns more explicit, 14.11 gives information on dealing with non-recent abuse, 14.14 explains separate process for complaints
2.0/Aug 2019	Section 15 page 21	The addition of a more detailed stand-alone section on managing allegations against staff including a new flowchart based on recommendations from Barnardo's and feedback from NSPCC
2.0/Aug 2019	Schedule 2 pages 26-33	The definitions of abuse have been updated in line with current safeguarding practice and feedback from NSPCC and Ann Craft Trust
2.0/Aug 2019	Schedule 3 page 34	The useful telephone numbers have been checked and updated and reflect changes to the Local Safeguarding Children's Board
2.1/Aug 2020	Throughout Policy	Updated the terminology for safeguarding team members to reflect the changes to the safeguarding provision and respective roles
2.1/Aug 2020	Section 6.2 and 6.4 page 10	Tightening of data protection and consent for images
2.1/Aug 2020	Introduction page 5 Section 8 page 12 Schedule 4 page 36	Definition of staff defined
2.1/Aug 2020	Section 8.4 page 14	Guidance for staff for supporting adults with additional needs
2.1/Aug 2020	Section 9 page 14 and Schedule 5	Additional paragraph to reflect increasing use of online and virtual environments together with a new schedule with guidance for online safety
2.1/Aug 2020	Section 14 page 16	Additional paragraphs to reinforce the approach to raising concerns no matter how small
2.1/Aug 2020	Section 13 page 16 and Schedule 4 page 38	Additional requirement for Legal Counsel/ HR Director to approve clauses in contracts/service level agreements
2.1/Aug 2020	Section 14 & 14.1 page 17 and Section 14.4 page 18	Additional requirement to inform HR Director of concerns
2.1/Aug 2020	Flow chart page 24	Flow chart amended requiring HR Director to be informed and make decisions with Head of Safeguarding
2.1/Aug 2020	Schedule 3 page 35	The useful telephone numbers have been checked and updated and new useful numbers added
2.2/July 2022	Introduction and Throughout Policy	Updated definition of "the Club" to include Women and the Community with the use of the "the Club" throughout the policy for easier reading and consistency

2.2/July 2022	Throughout Policy	Updated to include more specific references to the Women's Academy
2.2/July 2022	Throughout Policy	Revised language to refer to Head of Safeguarding, Designated Safeguarding Leads and Designated Safeguarding Officers to reflect the current safeguarding team roles
2.2/July 2022	8.2 page 13	Reference to the new law on positions of trust in sport
2.2/July 2022	Section 12 page 16	More detail relating to safeguarding training and updates to include additional requirements for safeguarding training for the Board and The FA course for parents
2.2/July 2022	Section 14.5 page 19	Updates to recording concerns using My Concern (electronic records)
2.2/July 2022	Section 15 page 23	More express reference to duty to refer to DBS
2.2/July 2022	Schedule 2 page 28	Use of child-on-child abuse in line with new terminology in KCSIE 2022
2.2/July 2022	Schedule 2 page 28	Review and refresh of schedule 2 for easier reading and use
2.2/July 2022	Schedule 3 page 36	Updates to the Useful Telephone Numbers
2.2/July 2022	Section 11 page 15 and Schedule 4 page 38	More detailed reference to requirements for overseas check in line with current best practice and revised to reflect new terminology in Safeguarding Policy
2.3 June 2023	Page 4 - Foreword by CEO	Reference to Covid-19 has been taken out
2.3/June 2023	Throughout policy	No change in main structure. Changes to bullet points being indented and consistency in layout. Premier League references have been amended to 'relevant League'
2.3/June 2023	Section 5 page 9 number 7	Last sentence has been reworded from: 'All significant incidents should be recorded and passed to the Head of Safeguarding.' To: 'All significant incidents must be recorded and passed to the Head of Safeguarding.'
2.3/June 2023	Section 6 page 10	Last sentence has been reworded from: 'In the event of a family member of a child or young person or an adult asks for a photograph to be removed, this shall be done without delay.' To: 'In the event of a child, young person or an adult, or an adult family member/carer asking for a photograph to be removed, this shall be done without delay.'
2.3/June 2023	Section 6.3 page 10	Second bullet point the word 'destruction' has been added
2.3/June 2023	Section 6.8 page 11	Third paragraph, the words 'In general' have been taken out
2.3/June 2023	Section 11 page 16	Bullet point 6. Consultation with PL: Overseas checks have been changed to 3 months in 5 years (no longer 3 months in 10) and the age added as it relates to a time when they were 16 or over. This is repeated on page 39 bullet point 8
2.3/June 2023	Section 11 page 16	Bullet point 7 reference to Self Declaration forms has been added and a new bullet point added re Club staff changing roles and reviewing DBS / Self Declaration forms. This is repeated in page 40
2.3/June 2023	Section 14.6 page 20	Additional information has been added to the 'Do' and 'Don't' section
2.3/June 2023	Section 15 page 24	Sentence added to end of the first paragraph: If the allegation involves a member of staff from Leicester City in the Community, then a referral may need to be made to the Charity Commissioner
2.3/June 2023	Page 36	EFL contact information has been added