

**EFL**

# **SAFEGUARDING CHILDREN POLICY**

**2024-2025**

This policy is available on-line at [www.efl.com](http://www.efl.com)

**WE WILL CONSIDER ANY REQUEST FOR THIS POLICY TO BE MADE AVAILABLE IN AN ALTERNATIVE FORMAT OR LANGUAGE. PLEASE CONTACT: SAFEGUARDING MANAGER**

**WE REVIEW OUR POLICIES REGULARLY TO UPDATE THEM AND TO ENSURE THAT THEY ARE ACCESSIBLE AND FAIR TO ALL. WE WELCOME SUGGESTIONS FOR IMPROVING THE ACCESSIBILITY OR FAIRNESS OF THIS POLICY.**

**ALL OUR POLICIES ARE SUBJECT TO EQUALITY IMPACT ASSESSMENTS\*. WE ARE ALWAYS KEEN TO HEAR FROM ANYONE WHO WISHES TO CONTRIBUTE TO THESE IMPACT ASSESSMENTS. PLEASE CONTACT: SAFEGUARDING MANAGER**

\*Equality Impact Assessments are carried out to see whether the policy has, or is likely to have, a negative impact on grounds of: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex or sexual orientation.

<b>APPROVED BY:</b>	<b>VERSION:</b>	<b>ISSUE DATE:</b>	<b>REVIEW DATE:</b>	<b>DOCUMENT OWNER:</b>
EFL BOARD	V5	01/05/2024	01/05/2025	Alex Richards, EFL Head of Safeguarding arichards@efl.com

### COMMITMENT STATEMENT

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**The EFL recognises that all children have a fundamental right to be protected from harm and exploitation and that they cannot achieve their goals effectively unless they feel and are safe. We will give equal priority to keeping all children safe regardless of their age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation.**

The EFL is committed to ensuring that best practice is adopted when working with all children, offering them support and protection, and accepts that it has a legal and moral responsibility to implement procedures, to provide a duty of care, to safeguard their wellbeing and to protect them from abuse.

This policy represents the EFL's response to the need to protect children and outlines our key objectives for all staff and volunteers working within our organisation including our Member Clubs to:

- Provide a safe environment for children to learn and develop in our settings and
- Identifying children who are suffering or likely to suffer significant harm, and taking appropriate action with the aim of making sure they are kept safe both outside and within the football environment

In pursuit of these aims the Board of the EFL will approve and annually review policies and procedures with the aim of:

- Raising awareness of issues relating to the welfare of children and young people and the promotion of a safe environment within the organisation
- Aiding the identification of children and young people at risk of significant harm, and providing procedures for reporting concerns
- Establishing procedures for reporting and dealing with allegations of abuse against any individual working in football
- Ensuring the safer recruitment of staff

### DEFINITIONS

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**Activity** means any activity or series of activities, arranged by or in the name of the EFL, for Children, Young People and/or Adults at Risk, or to be attended by Children, Young People and/or Adults at Risk.

**Child, Children, Young Person and Young People** means any person(s) who have not yet reached their eighteenth birthday.

**Club** means an association football club in membership of the EFL.

**Safeguarding Children and Young People** is the action that is taken to promote the welfare of children and protect them from harm.

This means:

- Protecting Children and Young People from abuse and maltreatment;
- Preventing harm to their health or development;
- Ensuring they grow up with the provision of safe and effective care; and
- Taking action to enable all Children and Young People to have the best outcomes.

**Staff** means any person employed or deployed by the EFL whether in a paid, voluntary, consultancy or third-party capacity.

**The Football Association ("The FA")** is English football's governing body.

## TYPES OF ABUSE

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**Physical abuse:** is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**Emotional abuse:** is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

**Sexual abuse:** is perpetrated by both men and women. Children can also abuse other children (Peer on Peer Abuse). Sexual Abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

**Child sexual exploitation:** (CSE) is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

**County lines:** is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of 'deal line'. They are likely to exploit children (disabled children are particularly vulnerable) to move and store the drugs and money, and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

**Neglect:** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate caregivers)
- ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**Grooming:** very commonly plays a key part in the sexual abuse of children. It refers to a process by which an individual manipulates those around them – typically (but not only) the child – to provide opportunities to abuse. It can involve communication with a child where this is an intention to commit a sex offence in person and/or online.

**Extremism:** Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance that aims to:

- 1 negate or destroy the fundamental rights and freedoms of others; or
- 2 undermine, overturn or replace the UK’s system of liberal parliamentary democracy and democratic rights; or
- 3 intentionally create a permissive environment for others to achieve the results in the above.

The types of behaviour below are indicative of the kind of promotion or advancement which may be relevant to the definition, and are an important guide to its application. The further context below is also an essential part of the definition.

Behaviour that could constitute extremism

**Aim 1** (negate or destroy fundamental rights and freedoms): Behaviour against a group, or members of it, that seeks to negate or destroy their rights to live equally under the law and free of fear, threat, violence, and discrimination. Including: Using, threatening, inciting, justifying, glorifying or excusing violence towards a group in order to dissuade them from using their legally defined rights and freedoms.

**Aim 2** (undermine, overturn or replace liberal democracy): Attempts to undermine, overturn, or replace the UK’s system of liberal parliamentary democracy and democratic rights. Including: Advocating that the UK’s parliamentary democracy and democratic values and rights are not compatible with their ideology, and seeking to challenge, overthrow, or change our political system outside of lawful means.

Using, threatening, inciting, justifying, glorifying or excusing violence towards citizens, in order to dissuade them from participating freely in the democratic process.

Subverting the way public or state institutions exercise their powers, in order to further ideological goals, for example through entryism, or by misusing powers or encouraging others to do so.

Using, threatening, inciting, justifying, glorifying or excusing violence towards public officials including our armed forces, police forces and members of local, devolved or national legislatures, in order to dissuade them from conducting their obligations freely and fearlessly, without external interference.

Establishing parallel governance structures which, whether or not they have formal legal underpinning, seek to supersede the lawful powers of existing institutions of state.

**Aim 3** (enabling the spread of extremism): Intentionally creating a permissive environment for behaviour in aim 1 or aim 2. Including: Providing an uncritical platform for individuals or representatives of groups or organisations that have demonstrated behaviour in either aim 1 or aim 2.

Facilitating activity of individuals or representatives of groups or organisations that have demonstrated behaviour in either aim 1 or aim 2, including through provision of endorsement, funding, or other forms of support.

The dissemination of extremist propaganda and narratives that call for behaviour in either aim 1 or aim 2.

Attempts to radicalise, indoctrinate and recruit others to an ideology based on violence, hatred or intolerance, including young people.

Consistent association with individuals or representatives of groups or organisations that have demonstrated behaviour in either aim 1 or aim 2 without providing critical challenge to their ideology or behaviour.

If any behaviour listed in aim 1 or aim 2 has occurred previously, a refusal by the individual, group or organisation that conducted the behaviour to rescind, repudiate or distance themselves from the behaviour.

**Female genital mutilation ("FGM"):** Involves procedures that intentionally alter or injure female genital organs for non-medical reasons. The procedure has no health benefits for girls and women. The Female Genital Mutilation Act makes it illegal to practise FGM in the UK or to take women and girls who are British nationals or permanent residents of the UK abroad for FGM whether or not it is lawful in another country.

**Bullying:** is the use of aggression with the intention of hurting another person this may be by an adult towards a child or peer on peer abuse. Bullying results in pain and distress to the victim. Bullying can be:

- Emotional being unfriendly, excluding (emotionally and physically) sending hurtful text messages, tormenting, (e.g. hiding football boots/shin guards, threatening gestures);
- Physical pushing, kicking, hitting, punching or any use of violence;
- Sexual unwanted physical contact or sexually abusive comments;
- Discriminatory comments, jokes about or targeted abuse aimed towards disabled children, homophobic, transphobic, sexist, gendered, racist or faith based comments;
- Verbal name-calling, sarcasm, spreading rumours, teasing.

**Cyberbullying:** is when a person uses technology i.e. mobile phones or the internet (social networking sites, chat rooms, instant messenger, tweets), to deliberately upset someone. This could take the form of posting derogatory abusive comments, videos or images on social media. Bullies often feel anonymous and 'distanced' from the incident when it takes place online and 'bystanders' can easily become bullies themselves by forwarding the information on.

**Discriminatory abuse:** 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. Actions may include unfair or less favourable treatment, culturally insensitive comments, insults and 'banter'. Discriminatory behaviour is unacceptable and will be reported to The FA. This includes incidents on and off the pitch (including social media).

**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 an 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, Young People and Adults at Risk are not afforded the necessary priority, compromising their welfare, for example, allowing abusive or concerning practices to go unreported, placing Children, Young People and Adults at Risk in potentially compromising and uncomfortable situations, failing to ensure the safety of Children, Young People and Adults at Risk, ignoring health and safety guidelines, or giving continued and unnecessary preferential treatment to individuals.

**Hazing:** Any rituals, initiation activities, actions or situations, with or without consent, which recklessly, intentionally or unintentionally endangers the physical or emotional wellbeing of Children, Young People and Adults at Risk.

**Peer-on-peer abuse and harmful sexual behaviour:** Children can abuse other children. This is most likely to include, but may not be limited to:

- Bullying (including cyberbullying);
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- Sexual violence, such as rape and sexual assault;
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;

- ‘Upskirting’, which typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- Sexting (also known as youth produced sexual imagery); and
- Initiation/hazing type violence and rituals.

**Infatuations:** Children, Young People and Adults at Risk may develop an infatuation with a member of Staff who works with them. Such situations should be handled sensitively to maintain the dignity and safety of all concerned. Staff should be aware that in such circumstances, there is a high risk that words or actions may be misinterpreted and that allegations could be made against Staff. They should therefore ensure that their own behaviour is above reproach. A member of Staff who becomes aware that a Child, Young Person or Adult at Risk may be infatuated with him/her or with a colleague, should discuss this at the earliest opportunity with the Safeguarding Team.

**Domestic violence or abuse:** is any type of controlling, bullying, threatening or violent behaviour between people in a relationship. It can seriously harm children and witnessing domestic abuse is child abuse. It's important to remember domestic abuse:

- Can happen inside and outside the home;
- Can happen over the phone, on the internet and on social networking sites;
- Can happen in any relationship and can continue even after the relationship has ended;
- Both men and women can be abused or abusers.

**Child Criminal Exploitation:** is 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 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. 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.

## **SAFEGUARDING PROCEDURES FOR STAFF, VOLUNTEERS, THIRD PARTIES AND SUBCONTRACTORS EMPLOYED BY THE EFL**

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### **Maintaining professional boundaries and appropriate behaviours**

Everyone who works or volunteers with children is responsible and accountable for the way in which they behave towards them and every child has a right to be treated with respect and dignity. It's expected that all adult-child relationships maintain clear and appropriate boundaries at all times, are supportive, positive and aimed at improving the child's skills, development and progress. Adult-child relationships should all focus on the respective activity/event.

Good safeguarding practices protects everyone. The EFL has produced a guide entitled “Safer Working Practice” a copy of which can be found on the Portal System (staff and Club intranet).

Whilst every attempt has been made to cover a wide range of activities in this guide it is recognised that it cannot cover all eventualities. Staff are expected to make judgements about their actions and behaviour to secure the best interests and safety of the Children in their care. All actions and behaviours should be guided by the principal that their safety and welfare of children is paramount

### **Responding to disclosures, safeguarding incidents and concerns**

Indications that a Child may be being abused can be difficult to recognise. Some signs and indicators may be explained by something plausible, for example, bereavement, sudden absence of a parent or carer, adolescence or accidental injury.

The presence of one or more signs and indicators should not be taken as proof that abuse has or is taking place, however Staff do not need evidence to report a concern. A person may be at increased risk of harm if you fail to report your concerns.

No single person can have a full picture of a Child's circumstances. Staff should never think that their concerns are not significant enough to act on. Staff should discuss their concerns with the EFL's Safeguarding Team.

All disclosures, incidents and allegations must be taken seriously and responded to in line with the EFL Safeguarding Policy and training. This includes allegations about non-recent abuse and allegations made against deceased individuals.

Staff should contact the EFL Safeguarding Team without delay if they witness an incident or come upon information pertaining to the safety and welfare of Children.

Anyone can contact emergency services or make a referral directly to statutory agencies, particularly if they are concerned about a Child's immediate safety, if they are having difficulty contacting a member of the EFL Safeguarding Team or if they are concerned that a disclosure or information about a safeguarding concern has not been acted upon appropriately.

The EFL will fully support anyone who in good faith reports their concerns about the safety and welfare of a child.

### **What is a disclosure?**

A disclosure is the process by which a person starts to share that they have been abused with others.

This can happen in a variety of ways including:

**Directly:** Telling someone what has happened to them.

**Indirectly:** Inadvertently or deliberately communicating through behaviours, emotions, art, writing, appearance, inquiries or discussions about fears, concerns or relationships.

We recognise that it takes extraordinary courage for someone to go through the journey of disclosing abuse and we will ensure that appropriate action is taken to support and protect them.

### **Responding to a disclosure**

#### **Listen:**

- Staff should give their full attention to the person disclosing and should keep their body language open and encouraging.
- Staff should respect pauses and not interrupt the person disclosing.
- Staff should limit any questioning to the minimum necessary to seek clarification only. When seeking clarification, Staff should use the language of the person disclosing to show that it is their experience.

#### **Reassure:**

Staff should provide reassurance that the person disclosing is being taken seriously and that they are not to blame.



### **Views and wishes:**

Staff should engage the person disclosing as far as possible about how best to respond to their safeguarding situation.

Staff are expected to act in the best interests of the child. Seek advice from the EFL Safeguarding Team without delay if in any doubt about what action to take, including sharing information.

### **Safety:**

Staff should ensure that the immediate needs of the person disclosing are met and should prioritise their safety and protection above all else. This may involve contacting emergency services and/ or statutory agencies. The EFL Safeguarding Team must be immediately notified of all such action.

### **Take action:**

Staff should explain to the person disclosing what action they will be taking and that they will support them through the process. There may be circumstances where it is not appropriate to explain the actions that will be taken, for example, a child's age and understanding or if doing so would place the person at greater risk of harm. Staff should refer details of the disclosure to the EFL Safeguarding Team.

Where it is suspected that a crime has been committed, the police should be contacted immediately, and physical, forensic and other evidence must be preserved.

### **Record:**

Good record keeping is essential safeguarding practice. It is vital that Staff make a written record as soon as possible after the person has disclosed, their immediate needs have been met and the appropriate referrals have been made.

Staff should contact the EFL Safeguarding Team if in doubt about recording requirements.

### **Staff must never:**

- Make ambitious promises or promise confidentiality.
- Seek details beyond those the person willingly discloses.
- Ask leading questions.
- Give the impression that the person disclosing is to blame.
- Approach the alleged perpetrator of abuse or person whose behaviour and/or actions there are concerns about.

### **Recording information:**

All incidents, allegations and disclosures must be recorded on an EFL Safeguarding Referral Form which can be found at Appendix 3. If Staff are unable to access our Safeguarding Referral Form, a written record should include the following information:

- Provide a factual account of what you have observed or have been told.
- The date and time of what you have witnessed or been told.
- Details of those involved: (i) person(s) whose safety and welfare there are concerns about, (ii) alleged perpetrator of abuse or person(s) whose behaviour or actions there are concerns about, (iii) witnesses and (iv) any third party who has raised concerns.
- Action taken and your rationale for taking these actions.
- Date and time of referring the information and to whom the information was referred.
- Your details as the referrer.

### **Staff are expected to:**

- Provide clear, concise and relevant information.
- Record information in an objective and professional manner.
- Record factual information rather than assumption of what you have witnessed or been told.
- Record actual words and language. Don't rephrase what you have been told or leave things like insults or intimate vocabulary out.
- Record observations, for example, a description of visible bruising or injuries. Never ask someone to remove or adjust their clothing to observe any bruises, marks or injuries.

If more information is recalled at a later date, this should be added as an addendum. The original record must not be changed.

### **Confidentiality and storing of information**

All disclosures, safeguarding incidents and allegations must be taken seriously, and every effort should be made to ensure that confidentiality is maintained for all concerned. A number of Football Clubs and Football Authorities use electronic case management systems to store safeguarding records and concerns. The storage of this information and relevant security measures will be outlined in the Data Protection and GDPR policy of the relevant organisation. In order to obtain a copy of the EFL's data retention document, which includes information as to how, why and for how long safeguarding records are retained, please contact the EFL Safeguarding Manager.

GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe. More information and advice on information sharing for safeguarding practitioners can be found here:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/721581/Information\\_sharing\\_advice\\_practitioners\\_safeguarding\\_services.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf)

Those who need to know are those who have specific responsibilities to support and protect the Child and others who may be at risk, for example, statutory agencies, the EFL Safeguarding Team, The FA, parents and carers.

### **Non Recent Abuse**

Non-recent abuse (also known as historical abuse) is an allegation of neglect, physical, sexual or emotional abuse made by or on behalf of someone who is now 18 years old or over, relating to an incident which took place when the alleged victim was under 18 years old.

Allegations of child abuse are sometimes made by adults and children many years after the abuse has occurred. There are many reasons for an allegation not being made at the time, including fear of reprisals, the degree of control exercised by the abuser, and shame or fear that the allegation may not be believed.

Reports of non-recent concerns or allegations of abuse may be complex, as the alleged victims may no longer be living in the same situation where the abuse occurred and/or the whereabouts of the alleged respondent may be unknown.

However, such cases should be responded to in the same way as any other safeguarding concern or allegation. That is because:

- There is a likelihood that a person who abused a child/children in the past will have continued and may still be doing so;
- Criminal prosecutions can still take place, despite the fact that the allegations are non-recent in nature and may have taken place many years ago.

### **Communication and media protocols**

All media enquiries and communication with Clubs and other stakeholders following a safeguarding incident or about a safeguarding provision generally must be approved by our Communication and Safeguarding Teams

### **Support for Staff**

Dealing with a disclosure or a safeguarding incident may have an impact on the wellbeing of those involved. It is important that anyone affected seeks help if they feel that they need support.

## **INFORMATION REGARDING EFL MEMBER CLUBS**

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The FA sets the safeguarding policy and regulatory framework across the game. A copy of the FA regulatory handbook can be found here:

<http://www.thefa.com/football-rules-governance/lawsandrules/fa-handbook>

The EFL produce annual safeguarding standards and regulations that govern Club's safeguarding arrangements and practices. A copy of the standards can be found here on our website:

[https://www.efl.com/siteassets/image/202021/safeguarding-standards-guide\\_final-version-2020-21.pdf](https://www.efl.com/siteassets/image/202021/safeguarding-standards-guide_final-version-2020-21.pdf)

The EFL regulations can be found here:

<https://www.efl.com/more/governance/efl-rules--regulations/>

Clubs implement their own safeguarding policies and procedures that must be consistent with the football regulation, legislation, statutory guidance and current best practice. All Clubs receive an annual safeguarding quality assurance visit which assesses their compliance against these requirements.

### **EFL Safeguarding team working alongside member Clubs**

The EFL's three year safeguarding strategy outlines how we will work alongside and support our Clubs to drive continuous improvement in relation to the safeguarding of children and adults at risk within our care. A copy of the strategy can be found on our website.

When in receipt of a referral from a Club the EFL safeguarding team will firstly provide support and guidance to the Club. Further action by the EFL may include:

- Having oversight and working with Clubs to ensure that internal procedures and football regulations are followed.
- Agreeing a Club led internal investigation with the outcome shared with the Football Authorities.
- Conducting a joint investigation with The FA.
- Commissioning an independent case review (possibly in conjunction with The FA).
- Participation in multi-agency strategy meetings.
- Working with Clubs to implement agreed multi-agency strategy meeting actions.
- Working with Police and football media relations to manage communication
- Issuing of sanctions where EFL requirements have been breached
- Working with Clubs to ensure that learning outcomes are implemented to mitigate risk of recurrence
- Sharing anonymised learning from cases to strengthen safeguarding provision across the game

The flowchart in Appendix 2 outlines the steps to be taken by Clubs when dealing with a disclosure, safeguarding incident or allegation.

The EFL Safeguarding Team produce a number of guides to help and support Clubs in the area of safeguarding copies of which can be found on the Portal (League intranet facility). A list of the documents can be found below and available upon request from the EFL Safeguarding Team:

- Managing Safeguarding Concerns
- DBS Eligibility Guidance
- Guide to Safer Working Practice for EFL Member Clubs
- Six steps for Operating Trips, Tours and Tournaments
- Six steps for Developing a Club Transport Policy
- Guidance to Member Clubs, Senior Appearance by an under 18
- Young Persons Guide to Safeguarding
- Care and Accommodation Arrangements for Academy Players
- EFL guide to Prevent
- Matchday Safeguarding Guide

### **Thresholds for referral to football authorities**

The thresholds below are set out in the FA professional game safeguarding thresholds and regulations:

- Any information received by a Professional Club or CCO regarding the abuse, harm or exploitation of a Child or Adult at Risk by an individual who is or has previously been involved in football related activity in any capacity. This includes any current, prospective or a former employee, volunteer, consultant, player (including academy players as defined in the Premier League and EFL Youth Development Rules), third party contractor and casual worker of any Professional Club or CCO whether the evidence relates to their performance, a recent or a non-recent allegation. This also includes any referrals made to external agencies;
- Any information received by a Professional Club or CCO regarding an allegation of a sexual offence of any nature, against anyone (irrespective of whether that person is a child or an adult at risk), by an individual who is or has previously been involved in football related activity in any capacity. This includes any current, prospective or a former employee, volunteer, consultant, player (including academy players as defined in the Premier League and EFL Youth Development Rules), third party contractor and casual worker of any Professional Club or CCO and whether the evidence related to a recent or a non-recent allegation. This also includes any referrals made to external agencies; and
- A third (or subsequent) incident or allegation of low-level concerns (as defined in Affiliated Football's Safeguarding Policy), whether similar in nature or otherwise, in relation to a Child or Adult at Risk involving the same Associated Person.

### **Identifying poor practice**

Incidents of poor practice occur when the needs of children and young people are not afforded the necessary priority, so that their welfare is compromised.

For example:

- When insufficient care is taken to avoid injuries (e.g. by excessive training or inappropriate training for the age, maturity, experience and ability of players)
- Giving continued and unnecessary preferential treatment to individuals and regularly or unfairly rejecting others (e.g. singling out and only focusing on the talented players and failing to involve the full squad)
- Placing children or young people in potentially compromising and uncomfortable situations with adults (e.g. changing in a 1:1 situation with a young referee)
- Allowing abusive or concerning practices to go unreported (e.g. a coach who ridicules and criticises players who make a mistake during a match)
- Ignoring health and safety guidelines (e.g. allowing young players set up goal posts unsupervised by adults)
- When a child's impairment related needs have not been taken into account

The assessment about whether an incident is one of child abuse or poor practice (or hazing) may not be able to be made at the point of referral, but only after the collation of relevant information

There is evidence which indicates that some children and young people have experienced what may be referred to as 'initiations more commonly now referred to as 'hazing' into a sports club or team; often a historical practice which may have been started with good intentions but can result in oppressive,

intimidating and abusive behaviour. Hazing; is any action or situation, with or without the consent of the children and young people, which recklessly, intentionally, or unintentionally endangers the mental, physical, or emotional wellbeing of a child or young person. Reported concerns of hazing will be taken seriously and appropriate actions taken.

- The majority of poor practice concerns can be dealt with by the club or alternatively with support and guidance from the EFL Safeguarding Team and/or FA
- All child abuse will be dealt with by The FA (in conjunction with the statutory agencies) and with the support of the EFL

### **Thresholds for referrals to statutory authorities**

Clubs may receive information regarding the welfare of a child or young person who is involved in football, yet the concern itself does not relate to someone within the game. In these circumstances (e.g. the concern relates to the child's home or a social setting other than football) the individual Clubs safeguarding policy and procedures should be implemented:

- Refer the concerns directly to local Children's Social Care or to the local Police. These agencies will advise the Club whether a formal referral to Children's Social Care is necessary and what further action the Club might need to be taken

### **FURTHER SAFEGUARDING INFORMATION FOR ANY INDIVIDUAL INVOLVED IN FOOTBALL**

Whilst we encourage concerns within our member Clubs to be raised with the employees with relevant safeguarding roles in the first instance we recognise that there are occasions when employees, stakeholders, parents and children may not feel comfortable in doing so. In these instances other relevant professional agencies can be contacted for advice, guidance and support:

## SUPPORT FOR SURVIVORS WHO HAVE EXPERIENCE CHILD ABUSE IN FOOTBALL

In order to support those who have come forward and disclosed sexual abuse in a football context, affiliated football authorities have:

- **Set up a dedicated helpline number for survivors** via the NSPCC. This provides survivors with initial advice and guidance, as well as ensuring referrals are made to the police. From 23 November 2016 to 19 October 2017 the football helpline received more than 2,500 calls. 941 calls were from people concerned about abuse in football and approximately 65% of these resulted in referrals to external agencies. The remainder of the calls were enquiries and advice contacts.
- **Partnered with Sporting Chance:** This partnership is to provide nationwide opportunities for support to survivors of sexual abuse in football. Sporting Chance has increased the number of available phone lines, tailored the initial face-to-face therapist assessment process for survivors, developed a set of criteria to select therapists with expertise in the field, and educated them about the Crown Prosecution Service pre-trial therapy guidance. This is important to ensure that survivors receive support that will not hinder the progress of any criminal or civil justice processes.
- **Offered direct support to all known survivors via the police:** Only the police know the details of the survivors who have come forward to pursue a criminal justice route. With this in mind, a letter signed by all the football authorities was sent by Operation Hydrant to all 43 police forces to distribute to everyone who had come forward. This offered survivors who chose to, free specialist therapeutic support for a sustained period of time. This offer from the football authorities was shared with and supported by survivors with whom we had an active dialogue.

Information on how survivors can access support and further guidance is available here:

<http://www.thefa.com/football-rules-governance/safeguarding/section-9-support-for-survivors>



**ALEX RICHARDS**  
**HEAD OF SAFEGUARDING EFL**  
T: 01772 325940  
E: [arichards@efl.com](mailto:arichards@efl.com)



**THE FA SAFEGUARDING TEAM**  
T: 0800 169 1863 and ask to speak to The FA Safeguarding Team  
E: [safeguarding@thefa.com](mailto:safeguarding@thefa.com)

## NSPCC

Contact the NSPCC helpline by calling 0808 800 5000 or by emailing [help@nspcc.org.uk](mailto:help@nspcc.org.uk) to get advice or share your concerns about a child. Trained professionals are available 24 hours a day, 7 days a week.

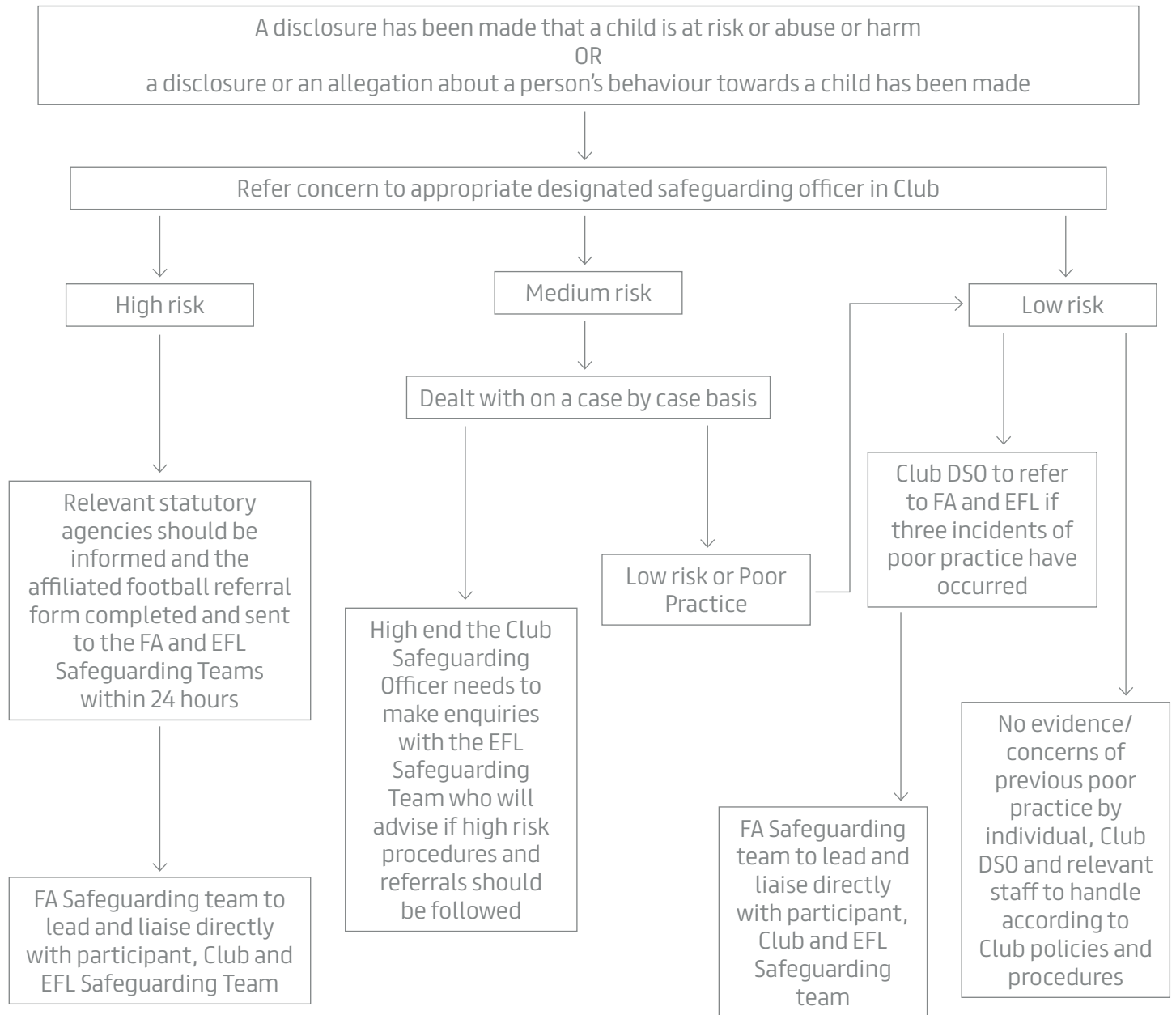
## POLICE

In an emergency or if someone is in immediate danger, call the Police on 999 (101 for non-emergencies).

The FA produce a number of safeguarding documents and guides for parents, young people and employees within the game which can be found here:

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

**APPENDIX 2- REFERRAL PROCESS FLOWCHARTS**



Support and advice on thresholds and how to make referrals is available from the safeguarding teams at the EFL and FA. Contact details can be found on page 12 of this document.

### **Duty to refer to DBS:**

Duty to refer to DBS is met when an employer has dismissed or removed a person from working with Children and Adults at Risk (or would or may have if the person had not left, resigned, retired, been made redundant or moved to another position) because the person has:

- Been cautioned or convicted for a 'relevant offence.'  
A 'relevant offence' for the purposes of referrals to the DBS is an offence that would result in the individual's automatic inclusion in the Children's or adults' barred list.
- Engaged in 'relevant conduct.'  
'Relevant conduct' is that which endangers or is likely to endanger Children and Adults at Risk.
- Satisfied the 'harm test.'  
A person satisfies the harm test if they may harm a child or adult at risk or put them at risk of harm. It is something a person may do to cause harm or pose a risk of harm to a child or adult at risk. Referrals to the DBS should be made once investigations and disciplinary processes are complete (even if the person has left employment). Referrals must be made even if a significant period has passed between the allegation and the gathering of evidence to support a decision to make a referral.



**APPENDIX 3- SAFEGUARDING REFERRAL FORM (FOR REPORTING OF CONCERNS/DISCLOSURES BY STAFF, VOLUNTEERS, 3RD PARTIES AND CONTRACTORS EMPLOYED BY THE EFL)**

**1. PERSON(S) WHOSE SAFETY AND/OR WELFARE THERE ARE CONCERNS ABOUT**

Please provide known details of the alleged victim(s)/person(s) whose safety and/or welfare there are concerns about

Forename and surname	
Date of birth/estimated age:	
Relationship to the EFL:	

In the case of a child, please provide their parent's/legal guardian's contact details below

Email address:	
Contact number	
Address:	

Please use a continuation sheet for details of additional persons

**2. DETAILS OF THE PERSON(S) WHOSE ACTIONS OR BEHAVIOUR THERE ARE CONCERNS ABOUT**

Please provide known details of the alleged perpetrator(s) of abuse/person(s) whose actions or behaviour there are concerns about

Forename and surname	
Date of birth/estimated age:	
Relationship to the EFL:	
Other known roles with children and/or adults at risk:	
FAN number:	

In the case of a child, please provide their parent's/legal guardian's contact details below

Forename and surname	
Contact number:	
Address:	

Please use a continuation sheet for details of additional persons

### 3. DETAILS OF ANY WITNESSES

Please provide known details of any witnesses to the incident

Forename and surname	
Date of birth/estimated age:	
Relationship to the EFL:	

In the case of a child, please provide their parent's/legal guardian's contact details below

Email address:	
Contact number	
Address:	

Please use a continuation sheet for details of additional witnesses

### 4. DETAILS OF THE DISCLOSURE, INCIDENT OR CONCERN

Please provide the time, date and location of the disclosure, incident or concern using a continuation sheet if necessary

Date:	
Time:	
Location:	

Please provide:

- A factual account rather than assumption of what you have witnessed or been told
- Clear, concise and relevant information






## 6. DETAILS OF THE PERSON COMPLETING THIS FORM

Forename and surname	
Relationship to the EFL:	
Email address:	
Contact number	
Address:	
Date:	

If you are making this referral on behalf of someone else who has reported information to you, please provide their details

Forename and surname	
Relationship to the EFL:	
Email address:	
Contact number	
Address:	

## EFL SAFEGUARDING TEAM

**ALEX RICHARDS**  
**HEAD OF SAFEGUARDING EFL**  
*T: 01772 325940*  
*E: arichards@efl.com*

## EXTERNAL SAFEGUARDING CONTACTS



**THE FOOTBALL ASSOCIATION SAFEGUARDING TEAM**  
*T: 0800 169 1863 ask to speak to a member of the Safeguarding Team*  
*(during office hours Mon-Fri excluding bank holidays)*  
*E: safeguarding@thefa.com*

**POLICE** 101 (or 999 in an emergency).

**NSPCC** 24-hour safeguarding children advice helpline 0808 800 5000