EFL SAFEGUARDING STANDARDS

2024-25 SEASON

STANDARD 1 – LEADERSHIP, GOVERNANCE AND CULTURE

Safeguarding is embedded in organisational leadership, governance and culture

1.1 There is demonstrable top-level commitment to safeguarding which promotes practice and behaviours that value children and adults at risk, creates a culture of accountability and drives continual improvement.

Leadership and Governance

Clubs are required to:

- have a robust and transparent safeguarding governance framework to drive accountability and continual improvement;
- ensure that the rights, safety and wellbeing of children and adults at risk are embedded in organisational values, strategic priorities and delivery plans;
- ensure that adequate resources are devoted to implementing effective safeguarding measures;
- ensure that appropriate action is taken when policies and procedures have been breached;
- have a risk management policy and effective procedures to proactively identify, mitigate and monitor organisational and departmental safeguarding risks;
- have a safeguarding risk register and risk management plan;
- implement measures to monitor and evaluate the effectiveness of safeguarding arrangements and make improvements as appropriate;
- ensure there are effective lines of communication between the Board and the Senior Safeguarding Manager; and
- ensure that safeguarding is a standing or regular Board meeting agenda item.

The Senior Safeguarding Manager:

- leads on delivery of the Club's strategic safeguarding priorities; and
- ensures that the Club's Board is kept appraised of incidents/allegations, themes and trends, progress of work to meet strategic safeguarding priorities, current and emerging risks and the effectiveness of risk mitigation measures.

The Club's Board:

- takes responsibility for ensuring that safeguarding measures are consistent with football authority regulations, legislation, statutory guidance and current best practice;
- monitors the effectiveness of work to meet strategic safeguarding priorities;
- monitors safeguarding risk and the effectiveness of mitigation measures;
- assures itself that safeguarding arrangements are effective and informed by risk and learning; and
- actively champions safeguarding and contributes to raising safeguarding awareness.

Culture

- The Club's Board drives a culture of safeguarding vigilance and continual learning.
- Safeguarding is recognised and delivered as a shared responsibility at all levels.
- Everyone champions attitudes, behaviours and practises that respect rights and promotes safety and wellbeing.
- Everyone demonstrates awareness of, and confidence in, the Club's approach to safeguarding, including confidence in reporting concerns.

Clubs are required to:

- have a long-term safeguarding strategy to guide priorities and to drive continual improvement;
- ensure that strategic safeguarding priorities are aligned to organisational strategic priorities and are informed by risk, learning and meaningful stakeholder consultation (see Safeguarding Standard 7); and
- have an adequately resourced implementation plan with SMART objectives.

STANDARD 2 – ROLES AND RESPONSIBILITIES

While the Club's Board is ultimately responsible for ensuring that there are effective safeguarding measures in place, there is a clear expectation that safeguarding is everyone's responsibility

2.1 There are dedicated staff with specific strategic and operational safeguarding responsibilities.

Required roles

- Board-level representative who holds leadership responsibility for the Club's safeguarding arrangements.
- Senior Safeguarding Manager with the necessary skills and expertise.
- Designated Safeguarding Officer responsible for raising safeguarding awareness within the Club under the direction and supervision of the Senior Safeguarding Manager.
- The role and responsibilities of the Senior Safeguarding Manager are set out in regulation 117.1
- The role and responsibilities of the Designated Safeguarding Officer are set out regulation 117.3

Note: The Club Senior Safeguarding Manager may delegate safeguarding responsibilities to one or more other members of staff ('Safeguarding Officer(s)'). In such circumstance, the Senior Safeguarding Manager must:

- ensure that there are effective safeguarding management structures in place;
- ensure that regular minuted meetings take place between the Designated Safeguarding Officer and Senior Safeguarding Manager;
- ensure that safeguarding staff have adequate time and support to fulfil their responsibilities;
- provide safeguarding supervision to members of the safeguarding team. This is separate from managerial supervision and is a place where safeguarding concerns can be discussed and reflected upon;
- supervise the work of each Safeguarding Officer and ensure that they are properly trained and supported.

2.2 There is a clear expectation and understanding that safeguarding is everyone's responsibility.

Clubs are required to:

- ensure that policies, procedures and training make clear that safeguarding is everyone's responsibility;
- ensure that staff role descriptions clearly define safeguarding responsibilities; and
- empower staff through procedures and training to exercise their professional judgment in identifying safeguarding risks and acting to protect the safety and wellbeing of children and adults at risk.

STANDARD 3 – PREVENTION: POLICIES, PROCEDURES AND PRACTICE

There are robust safeguarding and related policies and procedures in place to promote and protect the rights, safety and wellbeing of children and adults at risk

Policies and procedures

3.1 There are robust safeguarding policies and procedures in place.

Clubs are required to

- have robust safeguarding policies and procedures that are consistent with relevant legislation, statutory guidance, international treaties, FA and EFL regulations and guidance;
- ensure safeguarding is embedded in associated policies and procedures, for example, recruitment and selection, procurement, IT acceptable use, care and accommodation, whistleblowing, data protection, domestic abuse, mental health and wellbeing; and
- ensure that safeguarding and related Club policies and procedures are reviewed annually or whenever there is a significant incident or change within the Club, or changes to relevant legislation, statutory or football authority guidance.

Standards of practice and behaviour

3.2 The Club promotes and maintains high standards of behaviour and practice.

Clubs are required to:

- have standards of practice and behaviour for all employed, commissioned or contracted persons (whether in a paid or voluntary capacity);
- have codes of conduct/behaviour expectations for parents, carers and spectators;
- have behaviour policies for children and adults at risk which acknowledges behaviour as a form of communication, includes appropriate sanctions and prioritises educational and supportive responses; and
- ensure that where there are concerns about behaviour, assessments are undertaken to determine whether there are any underlying factors requiring protective and/or supportive intervention.

Safer Recruitment

3.3 There are robust safer recruitment procedures in place to prevent unsuitable individuals from working with, having access to, or influence over children and adults at risk.

- Clubs are required to ensure that procedures and practises are consistent with Safer Recruitment guidance as outlined in Keeping Children Safe in Education 2024 and EFL regulation 122.
- Clubs may transfer an FA DBS check on Whole Game System if the check is at the same required level and complete a risk assessment so that the individual can start in post. However a Club DBS must still be completed as soon as possible.

Creating safe experiences

3.4 The Club ensures that physical and online environments promote safety and wellbeing while minimising the opportunity for children and adults at risk to be harmed and/or exposed to harmful or inappropriate behaviour, materials or content.

- Clubs are required to ensure that procedures and practises are consistent with statutory guidance and legislation
- Match day and event safeguarding policies and procedures are consistent with relevant legislation and guidance (including Green and Purple Guides), football authority requirements and guidance
- Match day and other stadium events have a safeguarding officer responsible for all safeguarding arrangements who works in effective partnership with those responsible for match day/stadium event command, control and co-ordination arrangements
- Safeguarding is embedded in match day/stadium event planning, pre-briefs, debriefs, test and exercise assurance measures
- Match day and stadium event stewards complete safeguarding training as approved by the League

3.5 There are robust measures for identifying, meeting and monitoring additional needs and vulnerability.

Clubs are required to:

- implement effective measures to proactively identify, meet and monitor additional needs and vulnerability;
- maintain an evidence-based and flexible approach to additional needs and vulnerability, for example, family life and experiences, adverse childhood experiences, involvement with statutory services, how protected characteristics (as outlined in the Equality Act 2010) may impact life experience, learning needs, disabilities, physical or mental health issues; and
- maintain accurate records of additional needs and vulnerability, the support provided and liaison with partners, for example, with schools and statutory partners.

Care and accommodation

3.6 There are robust governance measures, policies and procedures in place for care and accommodation arrangements.

Clubs are required to:

- have robust care and accommodation policies and procedures which:

  – reference associated Club policies and procedures, for example, recruitment and selection/ safer recruitment, safeguarding, concern and allegation management, data protection, complaints and whistleblowing;

  – align with local authority procedures and private fostering regulations;

  – ensure that the Senior Safeguarding Manager and Designated Safeguarding Officer have oversight of risks and the effectiveness of mitigation measures (to be recorded in the risk register);

  – includes clarity on roles and responsibilities and ensures effective interdisciplinary (including safeguarding team representation) to identify, meet and monitor the needs of children placed with care and accommodation providers;

  – includes safeguarding expertise in selection, approval and review panels/processes;

  – details all procedures to be followed, for example, recruitment and selection, suitability assessments, matching and placements, recording and data protection, monitoring and suitability reviews; and

  – ensures the safeguarding team leads the response to safeguarding concerns and allegations and that the safeguarding team is involved in reviewing all complaints against care and accommodation providers and/or decisions to terminate services;

- ensure that care and accommodation providers are appointed in accordance with the safer recruitment requirements set out in Safeguarding Standard 3.3 and are subject to suitability assessments undertaken by staff with appropriate knowledge and experience in assessing the suitability of individuals providing care outside of the family home. These assessments must consider the suitability of prospective care and accommodation providers and the adequacy of the facilities being offered, including children having their own bedrooms;

- ensure that recruitment and selection procedures encourage applications from diverse and representative applicants;

- when appointing care and accommodation providers, avoid potential conflict of interest and risk associated with employees caring for and accommodating children in their own homes;

- ensure there are contractual agreements with care and accommodation providers which include safeguarding obligations;

- ensure that prior to placing any child in their care, care and accommodation providers are inducted in accordance with the requirements set out in Safeguarding Standard 4.1 and ensure that accurate records are maintained;

- ensure that care and accommodation providers are included in the Club's safeguarding workforce development plan (see Safeguarding Standard 4.2);

- implement regular care and accommodation provider suitability reviews;

- ensure that matching processes and placement plans take account of specific needs and include meaningful consultation with children and their parents/carers. Additionally, there must be measures to seek their feedback on care and accommodation providers as part of suitability review procedures and have their views considered when determining if a placement is to be sustained or changed;

- have documented individual placement plans with quality recording detailing how children placed with care and accommodation providers will be cared for and demonstrate how specific needs have been considered and will be met;

- ensure that placements are monitored and reviewed, including through stakeholder consultation and documented scheduled and unannounced visits by identified staff;

- ensure there is effective communication and partnership working between the Club, care and accommodation providers, children and their parents/carers; and

- proactively monitor the effectiveness of care and accommodation

Prevent Duty

3.7 There are effective measures for protecting against extremism and radicalisation.

- Clubs are required to ensure that procedures and practises are consistent with the statutory Prevent Duty Guidance.

STANDARD 4 – EDUCATING AND EMPOWERING

Everyone is trained and empowered to fulfil their safeguarding responsibilities, to access support and report concerns

4.1 Everyone is made aware of their safeguarding responsibilities and the Club's expectations when commencing their role.

Clubs are required to:

- implement a robust induction process including training which includes familiarisation with policies and procedures, expected standards of practice and behaviour, the role and responsibilities of designated safeguarding staff and how to contact them as well as out of hours contacts;
- ensure completion of the League's approved safeguarding e-learning module (or an appropriate equivalent) before commencing their role or as part of the induction process;
- ensure completion of any League mandatory safeguarding training by the Club Designated Safeguarding Officer;
- ensure that staff are provided with the League's Guidance for Safer Working Practice; and
- ensure that all academy staff have read and understand Part 1 of Keeping Children Safe in Education.

4.2 There is a clear commitment to developing a workforce who are competent and empowered to create safe environments, recognise safeguarding concerns and risks, and to take appropriate action to protect the safety and wellbeing of children and adults at risk.

Clubs are required to:

- have a safeguarding workforce development plan which ensures that all employed, commissioned or contracted persons (whether in a paid or voluntary capacity) receive regular safeguarding training commensurate with their responsibilities;
- ensure the workforce development plan includes:
  - Club Board Directors complete training as required under regulation 118.2.2
  - designated safeguarding staff receiving annual continuing professional development;
  - staff involved in recruitment and selection procedures receiving safer recruitment training refreshed every three years;
  - adult first team/professional players and the staff who work with them receive Safeguarding and Healthy Relationships Training; and
  - training which supports the embedding of a trauma-informed understanding and approach.
- ensure that the single central record holds accurate safeguarding training attendance records;
- implement measures to assess the effectiveness of the safeguarding workforce development plan; and

- regularly review and update the safeguarding workforce development plan taking risk, themes/ trends, learning, changes to legislation and statutory guidance, football authority requirements and guidance, and stakeholder feedback into consideration.

4.3 Children and adults at risk are informed about their rights and are empowered to access support and report concerns.
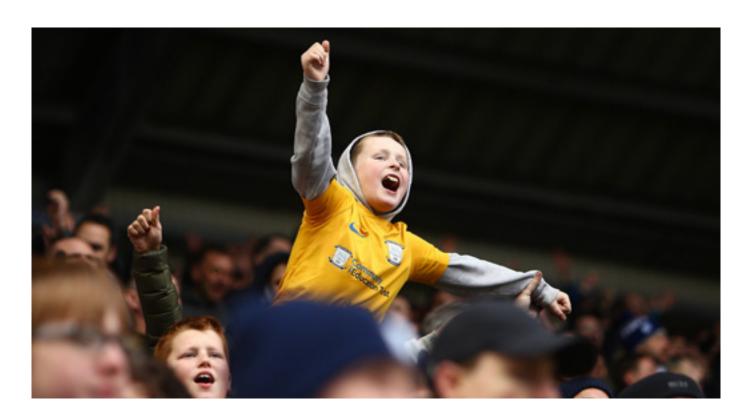
Clubs are required to:

- ensure that children, adults at risk and their parents/carers are familiar with safeguarding policies and procedures, they understand the role and responsibilities of designated safeguarding staff and how to contact them to access support and/or report concerns;

- ensure academy players are provided with information and education on their rights, personal safety, healthy relationships, making wise decisions/choices, how to access support and report concerns; and

- ensure parents/carers and care and accommodation providers are included as key stakeholders in safeguarding communication plans and awareness raising measures.

4.4 Safeguarding, complaints and whistleblowing policies and procedures are accessible and widely promoted.

Clubs are required to

- ensure that safeguarding, complaints and whistleblowing procedures are easily understood and widely promoted.

STANDARD 5 – PROTECTION

There are effective measures in place for responding to safeguarding concerns and allegations

Policies and procedures

5.1 There are robust and widely promoted policies and procedures for reporting and responding to all types of concern.

Clubs are required to:

- have effective procedures for responding to concerns about the safety and welfare of children and adults at risk, allegations and low-level concerns;
- have safeguarding recording standards; and
- have complaints and whistleblowing procedures.

Recording system

5.2 There is an effective electronic case management system for recording and tracking safeguarding concerns and allegations.

Clubs are required to:

- have an electronic safeguarding concern management system which as a minimum:
    - allows direct recording/reporting by staff;
    - alerts safeguarding staff immediately as concerns are reported;
    - is compliant with data protection requirements and enables restricted access;
    - has functionality to assign and monitor actions; and
    - has functionality to capture data to support analysis of trends.

- have a single system approach to the recording of all safeguarding, welfare or wellbeing issues have documented thresholds which provide clarity on issues to be recorded on the Club's electronic safeguarding concern management system.

Practice

5.3 The Club's response to safeguarding concerns and allegations is robust.

Clubs are required to:

• ensure that policies and procedures are consistently implemented;

• act in the best interests of, and provide effective protection for, children and adults at risk;

• ensure that persons involved in the implementation of safeguarding concern and allegation management procedures have the necessary skills and expertise;

• ensure case records demonstrate sound professional judgment, defensible decision-making and how the voices/views of children and adults at risk have been considered;

• consult with, and where necessary, make referrals to statutory agencies;

• consult with, and where necessary, make referrals to The FA and EFL in accordance with FA regulations and EFL regulation 120;

• implement measures to identify and implement learning; and

• ensure the Board receives regular anonymised information about safeguarding concerns, allegations, risks and themes/trends.

STANDARD 6 – WORKING TOGETHER

Working together underpins the Club's approach to promoting and protecting the rights, safety and wellbeing of children and adults at risk

6.1 There is a collaborative and cohesive approach to promoting and protecting the rights, safety and wellbeing of children and adults at risk.

Clubs are required to:

- implement robust interdisciplinary approaches to identifying and mitigating safeguarding risks;
- implement robust interdisciplinary approaches (including safeguarding expertise) to identifying; meeting and monitoring the needs of children and adults at risk engaged in Club activities (including with the first team), for example, additional needs and vulnerability, behaviour, mental health and wellbeing to enable the early identification of needs/concerns and to provide effective support and protection;
- ensure that safeguarding is embedded in player loan and transition processes; and
- have clear and effective safeguarding governance arrangements and a contractual agreement in place between the Club and its affiliated Club Community Organisation.

6.2 There are effective safeguarding due diligence and quality assurance measures embedded in partnerships, commissioned services and affiliated activities that involve attendance by, or participation of, children and/or adults at risk.

Clubs are required to:

- implement effective safeguarding due diligence measures to assess the adequacy of prospective partner safeguarding and safer recruitment procedures and practises;
- ensure that contractual agreements have robust safeguarding clauses, including consequences where safeguarding obligations are not met;
- ensure there is clarity on which policies and procedures must be followed;
- ensure that partners and service providers are trained in the procedures they are required to adhere to;
- implement quality assurance measures to ensure compliance; and
- ensure appropriate action is taken where safeguarding obligations are not met.

STANDARD 7 – LISTENING CULTURE

There is a culture that promotes listening to and acting on the experiences and views of stakeholders to drive continual improvement

7.1 The Club proactively seeks and acts on feedback from stakeholders on a regular basis to strengthen its safeguarding arrangements.

Clubs are required to:

- provide a range of safe and inclusive opportunities for staff and relevant stakeholders to form and express their views and share concerns;
- demonstrate that the views and concerns of staff and relevant stakeholders are acted upon, as appropriate;
- ensure that staff and relevant stakeholders receive feedback in a timely manner; and
- provide opportunities for staff and relevant stakeholders to participate in the review and evaluation of consultation measures.

7.2 There is a culture of listening to children and adults at risk and taking account of their experiences and views in individual decisions and to inform enhancements to the Club's approach to promoting and protecting their rights, safety and wellbeing.

Clubs are required to:

- implement a systematic approach to understanding whether children and adults at risk feel safe and identifying barriers which may increase vulnerability and prevent them from speaking out. This includes supporting staff to be curious about possible needs being communicated through behaviour;
- ensure staff understand children's right to participate meaningfully in decisions that affect them, and what this means in practice;
- provide a range of safe, inclusive and age-appropriate opportunities to form and express views and share concerns;
- demonstrate that the views and concerns of children and adults at risk are acted upon, as appropriate;
- ensure age-appropriate and accessible feedback is provided in a timely manner; and
- provide opportunities to participate in the review and evaluation of consultation measures.