



Safeguarding Children and Young Person Policy

Statement of intent from the Board

Sheffield Wednesday Football Club (SWFC) and Sheffield Wednesday FC Community Programme (SWFCCP) are committed to safeguarding the welfare of children, young people, and adults. SWFC and SWFCCP will ensure the safety of all those who engage with and whom we come into contact with. We expect all staff, players, volunteers, participants, contractors and guests to share this commitment.

SWFC and SWFCCP acknowledges and accepts it has a statutory obligation and responsibility for the wellbeing and safety of all children and young people who are under the club and/or Community Programme's care or are utilising our facilities. Everyone working at SWFC and SWFCCP has a 'duty of care to safeguard the welfare of children and young people by creating an environment that protects them from harm.

The wellbeing of children is paramount, and all staff must make themselves conversant with this policy. The following guidelines will be supplemented by in-service training and additional guidance accordingly.

Definitions

A 'Child' (collectively referred to as 'Children') is defined as anyone under the age of 18.

An 'Activity' means any activity or series of activities arranged for a Child or Children by or in the name of the club and/or community programme. These are deemed to be regulated and therefore activate the required levels of Criminal Record Checks that are associated.

Rules and Regulations

All staff, players, volunteers, participants, contractors and guests have a responsibility to report any concerns about the welfare of any child, young person or vulnerable adult.

SWFC and SWFCCP are committed to ensuring that:

- The safety and welfare of children, young people and vulnerable adults under our care is paramount
- All children, young people and vulnerable adults that engage with the club and/or community programme, regardless of age, culture, social background, disability, gender, language, racial origin, religious belief and/or sexual identity have the right to safety and protection from abuse or harm
- All suspicions, reports and/or allegations of abuse will be taken seriously and investigated thoroughly which may involve the appropriate Local Authority teams where necessary

Aims

Through this policy SWFC and SWFCCP aims to:

- Safeguard all children, young people and vulnerable people that come into contact with the club and/or community programme
- To demonstrate best practice in the area of safeguarding children, young people and vulnerable adults



- Increase awareness and understanding of safeguarding issues
- Provide guidance for parents and carers on understanding the reporting procedures
- Provide guidance for staff, players, volunteers, contractors and guests on understanding the reporting procedures
- Ensure that coaches, parents, participants, staff, players and other adults who come into contact with children, young people and vulnerable adults provide good role models for behaviour
- Promote high ethical standards throughout SWFC and/or SWFCCP

Rules Regulations and Guidance

SWFC and SWFCCP are governed by the legislation and rules and regulations set out by key governing agencies including the Government, The Football Association, EFL and the NSPCC Child Protection in Sport Unit.

Club Designated Safeguarding Officer

The Club Safeguarding Officer has responsibility to oversee and direct the safe provision of all activities and associated training relating to children and young people. This is a strategic role providing leadership and guidance on all safeguarding matters and relevant legislation, along with implementing safeguarding awareness and best practice club across the club, academy and community programme.

The Safeguarding Officer will:

- Manage the implementation of the club and community programme strategy and action and implementation plan for safeguarding
- Ensure SWFC compliance with statutory obligations under relevant legislation and the Affiliated Football Safeguarding Policy.
- Work closely with HR and heads of departments to develop and implement safer recruitment and induction practices across the organisations
- Continuously work to maintain, embed and improve SWFC's safeguarding provision ensuring the highest standards for safeguarding vulnerable groups
- Manage the development, implementation, promotion and review of the safeguarding vulnerable groups' policies, practices and good practice guidelines
- Be the lead member of staff to manage safeguarding incidents, concerns and allegations
- Be the lead member of staff to work in partnership with statutory and football authorities, sharing information where appropriate to safeguard vulnerable groups
- Maintain accurate, confidential, and up to date records on all safeguarding incidents, concerns and allegations.
- Give direction and guidance to staff in respect of safeguarding incidents, concerns and allegations
- Support staff to respond appropriately to concerns about the welfare or safety of vulnerable groups
- Lead and provide direction to Safeguarding Officer
- Ensure that Safeguarding Officers are trained, supported and supervised
- Act as the lead source of safeguarding support, advice and expertise
- Ensure staff understand their individual responsibilities to safeguard and promote the welfare of vulnerable groups
- Develop relationships with statutory and football authorities



- Attend regular safeguarding training and maintain an up-to-date knowledge base of relevant legislation, regulations, and best practice

Recording and Investigating of Allegations or Suspicion

The Designated Safeguarding Officer (DSO) will immediately report an allegation to the Designated Safeguarding Manager, who will ask for a written factual statement from the person making the report.

A Safeguarding Disclosure Form must be completed and submitted within 24 hours to the Designated Safeguarding Officer and Designated Safeguarding Manager. Any statement made by the child should be reported in their own words.

These reports should be confined to facts. Any opinion, interpretation or judgement should be clearly stated as this, questions should be kept to a minimum, and where used, they should be of an open format (TED questions; 'tell me', 'explain', 'describe'). No suggestion of who the perpetrator was or how any concern or incident happened should be suggested. A child should never be pressured to give information or show physical marks unless they do so willingly. If they choose to show markings, two members of staff should be present and any marks raising concern should be recorded on the disclosure form.

There are actions which staff have to, and are obliged to take, once they are aware of a problem. Undertakings of confidentiality should not be given either to the person making the allegations or to the person being interviewed. A matter is confidential on a need-to-know basis, and nobody should have any reservations about referring any issue to the Designated Safeguarding Manager or any Designated Safeguarding Officer.

The key issue is that the welfare of the child is protected. There is always tension and caution around issues of confidentiality. The advice for all staff is that no guarantee of confidentiality can be given to a child (although this does not necessarily mean that the parents/carers have to be told). SWFC and SWFCCP will ensure that any child concerned is immediately removed from any possible risk of harm.

Investigations into possible abuse will require careful management. In these cases, the Designated Safeguarding Officer or Designated Safeguarding Manager will first seek the advice of the Safeguarding Children Team, Children's Services, a Local Authority Designated Officer (LADO), the Police, or the Football Association Safeguarding Children Team, before setting up an internal inquiry and take their advice on informing the child's parents. In any case of suspected abuse, as soon as the Local Authority or the police have been informed, SWFC and/or must provide a report to the FA Head of Safeguarding Children. Any external local authority provision will naturally take the lead on any case.

In the event that the allegation or suspicion is investigated internally by the Designated Safeguarding Officer or Designated Safeguarding Manager, SWFC and SWFCCP will follow the 'Sport Resolutions Practical Guide to Undertaking Safeguarding Investigations in Sport' best practice guidance when recording allegations/suspicions and any subsequent investigations. Any investigation we undertake will follow the key principles as follows:



- Integrity – we will be honest with all parties involved in regard to the process and what we can, and cannot do
- Fairness and Impartiality – we will speak to the complainant/s, witnesses, and the individual/s to which the concern relates to, to seek a balanced and unbiased account of events
- Confidentiality – we will ensure that we follow confidentiality protocols and only share information with parties necessary for safeguarding reasons e.g. statutory authorities, (such as police or children’s services), or local authorities (such as LADO)
- Proportionality – decision-making will be made on a case-by-case basis, taking into consideration a number of factors relevant to each case
- Timeliness – whilst we recognise that investigations can be disruptive to the organisation, we will ensure that investigations are prioritised, but also thorough and methodical with a person-centric approach and never rushed

Providing it is appropriate to do so the Designated Safeguarding Manager will maintain constant dialogue with all parties involved with the allegation until such time as the matter has reached a reasonable outcome, taking the lead from the external agency.

Escalation to inform Board level will take place at the Designated Safeguarding Manager’s earliest opportunity. Specific information regarding allegations against members of staff if the report involves an allegation about any member of staff (whether full time, part time, paid, unpaid, contracted, engaged, voluntary etc) and it is believed the report could demonstrate that the member of staff in question has:

- behaved in a way that has harmed a child or may have harmed a child
- possibly committed a criminal offence against or related to a child or:
- behaved towards a child or children in a way that indicates he or she is unsuitable to work with children, then the Designated Safeguarding Manager or Designated Safeguarding Officer shall immediately inform the Local Authority Designated Officer (LADO) where the alleged incident took place so that he or she can consult with the police and Local Authority Children’s Social Care colleagues as appropriate

Where the Designated Safeguarding Manager or Safeguarding Officers are unsure as to whether the report meets the criteria stated above, the advice of the LADO shall still be sought. The member of staff in question may be asked to write a brief report, as may any other person deemed to have an involvement in the allegation. The member of staff in question will be asked to stay away from activities pending the conclusion of any investigation. This process would only be carried out once the advice of the above-mentioned external bodies had been sought and only then in consultation with the Designated Safeguarding Manager or Designated Safeguarding Officer.

Providing it does not conflict with any advice received from LADO, any internal investigation will be carried out in line with SWFC/SWFCCP Management and Human Resource Policies and either general or department-specific Grievance Procedures as they are applicable.

The Concept of Significant Harm

Some children are in need because they are suffering, or likely to suffer, significant harm. The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interests of children and gives local authorities a



duty to make enquiries to decide whether they should take action to safeguard or promote the welfare of a child who is suffering, or likely to suffer, significant harm.

A court may make a care order (committing the child to the care of the local authority) or supervision order (putting the child under the supervision of a social worker or a probation officer) in respect of a child if it is satisfied that:

- the child is suffering, or is likely to suffer, significant harm and:
- the harm, or likelihood of harm, is attributable to a lack of adequate parental care or control

There are no absolute criteria on which to rely when judging what constitutes significant harm.

Consideration of the severity of ill-treatment may include the degree and the extent of physical harm, the duration and frequency of abuse and neglect, the extent of premeditation, and the presence or degree of threat, coercion, sadism and bizarre or unusual elements. Each of these elements have been associated with more severe effects on the child, and/or relatively greater difficulty in helping the child overcome the adverse impact of the maltreatment. Sometimes a single traumatic event may constitute significant harm, for example, a violent assault, suffocation or poisoning.

More often, significant harm is a compilation of significant events, both acute and long-standing, which interrupt, change, or damage the child's physical and psychological development. Some children live in family and social circumstances where their health and development are neglected. For them, it is the corrosiveness of long-term emotional, physical or sexual abuse that causes impairment to the extent of constituting significant harm. In each case, it is necessary to consider any maltreatment alongside the child's own assessment of his or her safety and welfare, the family's strengths and supports, as well as an assessment of the likelihood and capacity for change and improvements in parenting and the care of children and young people.

Types of Abuse

Definitions of types of abuse are provided below. Should you have any concern that abuse is occurring you should contact the Designated Safeguarding Manager or Designated Safeguarding Officer immediately.

Physical abuse: Any deliberate act causing injury or trauma to another person, for example, hitting, slapping, pushing, kicking, burning, giving a person medicine that they do not need and/or that may harm them or application of inappropriate restraint measures.

Emotional abuse: Any act or other treatment which may cause emotional damage and undermine a person's sense of wellbeing, including persistent criticism, denigration or putting unrealistic expectations on Children, Young People and Adults at Risk, isolation, verbal assault, humiliation, blaming, controlling, intimidation or use of threats.

Sexual abuse: Any act which results in the exploitation of Children, Young People and Adults at Risk, whether with their consent or not, for the purpose of sexual or erotic gratification. This includes non-contact activities, such as indecent exposure, involving Children, Young People and Adults at Risk in witnessing sexual acts, looking at sexual images/pornography or grooming them in



preparation for abuse (including via the internet).

Whilst the age of consent (the age at which a person is considered to be legally competent to consent to sexual acts) is 16, it is unacceptable for any member of staff to abuse their relationship of trust for sexual gratification.

Child sexual exploitation: A form of Child sexual abuse. It occurs where an individual or groups of people take advantage of an imbalance of power to coerce, manipulate or deceive a Child or Young Person into sexual activity in exchange for something the victim needs or wants and/or 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 can also take place through the use of technology.

Child criminal exploitation: Can include Children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others.

County lines: The organised criminal distribution of drugs by gangs from the big cities into smaller towns and rural areas using Children, Young People and Adults at Risk. Gangs recruit Children, Young People and Adults at Risk through deception, intimidation, violence, debt, bondage and/or grooming. Gangs also use local property as a base for their activities, and 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, Young People and Adults at Risk upon whom they rely on to conduct and/or facilitate such criminality.

Cuckooing: Cuckooing is a term often linked to county lines. Cuckooing is when gangs establish a base in the location, they are targeting for drug dealing and to operate their criminal activity from, often taking over the homes of adults at risk by force or coercion. People exploited in this way will quite often be exposed to physical, mental and sexual abuse, and in some instances will be trafficked to areas a long way from home as part of the network's drug dealing business. Victims of 'cuckooing' are often drug users but can include older people, those suffering from mental or physical health problems, female sex workers, single mothers and those living in poverty. Victims may suffer from other forms of addiction, such as alcoholism.

Neglect: Ongoing failure to meet the basic needs of Children, Young People and Adults at Risk. Neglect may involve failing to provide adequate food or shelter including exclusion from home or abandonment, failing to protect them from physical and emotional harm or danger or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, basic emotional needs. In an activity setting, it may involve failing to ensure that Children, Young People and Adults at Risk are safe and adequately supervised or exposing them to unnecessary risks.

Grooming: The process of developing a relationship with and the trust of an individual, and sometimes their family, to exploit, abuse or traffic them. Grooming can happen both online and in



person. Radicalisation: The process by which a person comes to support terrorism and forms of extremism leading to terrorism. Anybody from any background can become radicalised. The grooming of Children, Young People and Adults at Risk for the purposes of involvement in extremist activity is a serious safeguarding issue.

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. **Forced Marriage**: Where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. This is recognised in the UK as a form of domestic and/or sexual violence against women and men and is a serious abuse of human rights. Where it affects children and young people it is child abuse. **Honour based Abuse/Violence**:

Honour based abuse (HBA), or violence (HBV) can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code. It is a violation of human rights and may be a form of domestic and/or sexual violence. Where it affects children and young people it is child abuse. It can be distinguished from other forms of abuse and violence, as it is often committed with some degree of approval and/or collusion from family and/or community members. Women, men and younger members of the family can all be involved in the abuse.

Victims of honour-based abuse are more likely to be abused multiple times by multiple perpetrators. Honour based abuse and violence manifests itself in a diverse range of ways with children and young people, it can lead to a deeply embedded form of coercive control, built on expectations about behaviour that are made clear at a young age. Honour-based abuse can also include forced marriage, domestic and/or sexual violence, rape, physical assaults, harassment, kidnap, threats of violence (including murder), witnessing violence directed towards a sibling or indeed another family member, and female genital mutilation. All staff working with suspected or actual victims of forced marriage and honour-based violence need to be aware of the 'one chance' rule. That is, they may only have one opportunity to speak to a victim or potential victim and may possibly only have one chance to save a life. If the victim is allowed to leave without the appropriate support and advice being offered, that one chance might be wasted.

Bullying: Repeated behaviour intended to intimidate or upset someone and/or make them feel uncomfortable or unsafe, for example, name calling, exclusion or isolation, spreading rumours, embarrassing someone in public or in front of their peers, threatening to cause harm, physically hurting someone or damaging their possessions.

Cyberbullying: The use of technology to harass, threaten, embarrass, humiliate, spread rumours or target another person. By definition, it occurs among Children and Young People. When an adult is the victim, it may meet the definition of cyber harassment or cyberstalking.

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. Child-on-child abuse: Children and Young People can be taken advantage of or harmed by another child or young person.

Child-on-child abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between individuals and within relationships (both intimate and non-intimate). 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: Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over, who are or have been intimate with partners or family members regardless of gender or sexuality. This can encompass, but is not limited to psychological, physical, sexual, financial, emotional abuse and so called 'honour' based violence.

Concerns around radicalisation and extremism: The Counter Terrorism and Security act places a duty on specified authorities, including sport in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism (the prevent duty). There is also a duty on local authorities to ensure there is a Channel Panel in place. This must include the local authority and senior police officers. The panel will assess to what extent identified individuals are vulnerable to being drawn into terrorism. The Act requires partners of the Channel Panel to cooperate with the panel in the carrying out of its functions and the police in Page 11 of 15 undertaking the initial assessment as to whether a referral is appropriate. Any concerns or queries regarding this should be discussed with the DSO as the designated lead for PREVENT.

The PREVENT strategy: Responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views. It provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice



and support. It works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation that we need to deal with. The strategy covers all forms of terrorism, including far right extremism and some aspects of non-violent extremism.

The Counter Terrorism & Security Act (2015): This Act places a duty on specified authorities including schools, Further and Higher Education, to have due regard to the need to prevent people from being drawn into terrorism (the PREVENT duty). At SWFC AND SWFCCP, we are committed to supporting vulnerable people through our safeguarding policies and procedures and recognise that this will support our contribution to the PREVENT duty. We build people's resilience to radicalisation by promoting fundamental British values and enabling our pupils to challenge extremist views.

Online safety: It is important that internet safety and security messages are re-enforced during any period of lockdown when we are expecting young people to be online more often. They may also be increasing their usage on devices during their own free time. It is important that both players and parents are aware of the help and support available should they be concerned about something they have seen or experienced online.

These include:

UK Safer Internet Centre <https://reportharmfulcontent.com/> CEOP

<https://www.ceop.police.uk/safety-centre/> Internet Matters <https://www.internetmatters.org>

NetAware <https://www.net-aware.org.uk>

Safeguarding Training

SWFC and SWFCCP will ensure there are qualified and designated individuals within the organisations that will take the lead on ensuring that we do all we can to meet its statutory and moral obligations. A Safeguarding induction is provided for all new starters, including full time, part time and casual members of staff. This induction is provided by the DSO. More specific training is given to people based on their job role and the need of the person.

All staff working in direct contact with children are required to complete the FA's three-hour Safeguarding Children Awareness Workshop and undertake a refresher course at least once every three years. Details of satisfactory completion are held on the SCR which can be accessed by the Club DSO and the HR team. Bi-annual training is provided to all staff as part of their own CPD and monthly updates are provided to all Staff through the Staff Newsletter. Following the release of new legislation that will have an impact on any work being carried out by the Club and Community Programme the DSO will ensure that all personnel are made aware of this and that it is incorporated into ways of working.

Recruitment

SWFC and SWFCCP have a specific safer recruitment policy which sets out in detail the process that undertaken in ensuring staff are suitable to work with children and adults at risk. A copy is available if required. All Staff will undertake a specific safeguarding and safer working practices induction upon employment. A briefing document and guidance for safer working practices will be provided and will also be available on the network. Key elements of SWFC Safeguarding Children Policy are discussed in more detail if the role requires it.



Disclosure and Barring Service Criminal Record (DBS) Checks

DBS checks will be carried out for all relevant postholders. New Staff will not be allowed unsupervised access to children and young people until a satisfactory DBS check has been received. The Club Designated Safeguarding Officer is responsible for ensuring all checks are carried out in the required timescales. SWFC and SWFCCP processes DBS checks via the FA Online Application System for posts governed by FA Regulations. All other posts outside this scope will have DBS checks processed by SWFC and/or SWFCCP directly with First Advantage Online Disclosures. Should a check highlight a criminal record on the individual that would deem them unsuitable to work with children and young people, the following will apply:

For checks completed via the First Advantage Online Disclosures, the Designated Safeguarding Officer will confidentially liaise directly with the applicant. In the event that a DBS check highlights a criminal record on the individual that would not deem them necessarily unsuitable to work with children and young people, this will be referred to HR for a risk assessment and final decision, and any subsequent job offer will be subject to consideration of the Rehabilitation of Offenders Act 1974; to the nature, seriousness and relevance of the offence; the time passed since the offence occurred and the age of the individual when the offence occurred; and whether it is an isolated offence or numerous offences; or decriminalisation. In the event that the applicant disputes any information contained in the disclosure and has contacted the DBS about the dispute, SWFC and/or SWFCCP may defer the decision regarding the appointment until the applicant has had reasonable opportunity to have the dispute considered by the DBS, but this deferral is at the absolute discretion of SWFC and/or SWFCCP.

We will accept portability of DBS certificates if individuals have joined the DBS Update Service, but only for posts not governed by the FA Regulations. Posts governed by the FA Regulations will require an in-date FA DBS certificate. Postholders previously employed in an FA regulated post will have their FA records checked on the FA Whole Game system before a new application is processed. It is compulsory that postholders agree to a 're-check' of DBS status at a time specified by the FA and the relevant league in place at such time. Such timeframes may change from time to time. It is compulsory that postholders also agree to inform SWFC and/or SWFCCP of any cautions or convictions that they have received mid-cycle. It is also compulsory that postholders confirm there are no changes to the DBS status prior to the start of each season. Recruitment and Selection Procedure Planning and Advertising before a position can be advertised, the post must have an authority to recruit duly authorised, and a Job Description/Person Specification which defines the duties, skills, qualifications, and experience of the role. It will also clearly state whether a Disclosure and Barring Service (DBS) Criminal Record Check will be required.

All posts will be advertised and managed by the HR Department. Depending on the post, this may be limited to internal advertising only. Whether the post is advertised internally and/or externally, the advert will always make clear SWFC and/or SWFCCP commitment to safeguarding and welfare of children and young people. Application Process Candidates will apply via completion of an SWFC Application Form as a minimum requirement (CVs will be accepted as additional supporting information to the Application Form but will not be relied upon for decision making). The Application Form includes the applicant's declaration regarding convictions, working with children, and the provisions of the Rehabilitation of Offenders Act 1974. Applicants that fail to complete the declaration will not be shortlisted. Shortlisting and Interview Stages: The recruiting manager will



shortlist the candidates by reviewing the Application Form (and any supporting documentation) against the Job Description/Person Specification.

Training and Awareness For Employees, Third Parties and Contractors

The DSO holds a specific Safeguarding & Safer Working Practice Induction with all new fixed-term, permanent starters, and volunteers during which the key elements of SWFC Safeguarding Children Policy are discussed in more detail and specifically to the individuals' role.

All staff working in direct contact with children are required to complete the FA's three-hour Safeguarding Children Awareness workshop and undertake a refresher course, as advised by the FA, at least once every three years. Safeguarding Awareness refresher courses are held by SWFC to develop knowledge which are department specific.

Work Experience

SWFC and/or SWFCCP may from time to time offer work experience placements to young people. Whilst undertaking work, those on work experience will not have unsupervised access to children. For those undertaking work experience who are under the age of 18, more detailed guidelines can be found in the policy regarding the employment/engagement of workers under the age of 18.

All external contractors engaged by SWFC and/or SWFCCP undergo a suitability test prior to commencing work. This will include evidencing the contractor's Safety Record, Safety Policy, Liability Insurance, Risk Assessment/Method Statement and details of Competent Person. On arrival at the Club the contractor will receive a site induction from a member of the Facilities Team which covers Safeguarding Children and give details of our expected code of behaviour. Contractors are subject to regular inspection from SWFC personnel. In the event of a Contractor carrying out work on an area that is usually occupied by children, this work where possible, will be undertaken when children are not present.

Ratios and the Supervision

Any activity undertaken by SWFC will always be given full consideration to the appropriate number of staff members available depending on the age of the children involved, the degree of risk the activity involves, and whether there are any additional disability needs. The lower the age of the participants, the greater the need for supervision.

Regardless of these ratios a minimum of two members of staff or delivery partner will always be available to supervise an activity. This ensures at least basic cover in the event of something impacting on the availability of one of the adults during the activity (e.g. in the event of a participant requiring the attention of an adult during the activity following an accident).

- For children under 5 the recommended ratio should be no more than 1:6.
- For children under 8 the recommended ratio should be no more than 1:8.
- For children over 8 the recommend ratio should be no more than 1:10, but this varies depending on the activity, advice should be sought from the Safeguarding Manager or Officer if unsure
- For Academy activities, the Premier League's Youth Development Rules prescribe a ratio of 1 Coach to 8 Players (over 8s).



- For organised groups of children attending a match day at Hillsborough Stadium, the minimum ratio is two responsible adults to 20 children; where SWFC and/or SWFCCP is taking responsibility for the care of the children, parents/carers should not be included in supervision calculations

Lone working Guidance

Lone working with children should only occur in exceptional circumstances, and if it does, the staff member must seek and follow the specific guidance from the Designated Safeguarding Officer. The Club only permits scouts from other clubs to attend its Academy Games Programme matches in accordance with the provisions of the Premier League Youth Development Rules.

Gifts and Favouritism

Staff should take care that they do not accept any gift that might be construed as a bribe by others or lead the giver to expect preferential treatment. All staff are expected to adhere to SWFC Anti-Corruption and Bribery policies which can be found in the Employee Handbook. It is recognised that there are occasions when children or parents wish to pass small tokens of appreciation to staff, for example at Christmas or as a 'thank you' and this is acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value as this may be misinterpreted by others. Staff should report any gifts received to their line manager and they should be dealt with appropriately.

Similarly, it is not permitted for staff to give personal gifts to children. This could be misinterpreted as a gesture either to bribe, or to single out the child. It might also be perceived that a 'favour' of some kind is expected in return. Any reward given to a child must first be agreed with the staff member's line manager as part of a structured reward system in line with the departmental policy and not based on favouritism.

SWFC and SWFCCP takes its guidance on the use of images from guidelines issued by the FA, EFL and Sheffield Safeguarding partnership. All images are taken by Club officials who have been briefed by the member of staff (and where possible a Safeguarding Officer) responsible for the activity being photographed / filmed as follows:

- Before taking images of children, parental consent is sought in writing at the start of each football season, education year or prior to the event: Parents/Legal Guardians are responsible for informing SWFC and/or SWFCCP of any change of circumstances within the season which may affect consent
- Parents/Legal Guardians will be informed of how the image will be used and SWFC and/or SWFCCP will not allow an image to be used for something other than that for which it was initially agreed
- All children featured in SWFC and/or SWFCCP publications will be appropriately dressed
- Where possible, the image will focus on the activity taking place and not a specific child
- Where appropriate, images represent the broad range of people participating safely in the event
- Designated Club photographers will, where applicable, undertake a DBS check and attend a Safeguarding Children workshop and in any case will be personally responsible for keeping up to date with the latest guidelines on the Use of Images policies issued by SWFC, SWFCCP Sheffield Safeguarding Partnership and by the EFL from time to time
- Children who are subject to family, care or legal proceedings, or who are under a court order will not have their images published in any SWFC or SWFCCP document



- No images of children featured in SWFC or SWFCCP publications will be accompanied by personal details such as their school or home address
- Recordings of children for the purposes of legitimate coaching aids are only filmed by Club officials and are stored safely and securely at SWFC premises
- Any instances of inappropriate images in football should be reported to the Club's Director of Communications and the Safeguarding Manager immediately
- SWFC and SWFCCP do not put young player profiles with images and personal information on their website

Matchday

In accordance with the Club's ticketing terms & conditions, the minimum age that a child is permitted to attend a match at the Club unaccompanied is 14-years-old.

Mascots & Ball Persons: The Club will only allow children to be matchday mascots or ball persons once parental consent has been obtained. A signed image consent form is also required before any images are published in the Club's matchday programme. No photographs of mascots or ball persons featured in Club publications will be accompanied by personal information about the child, such as their school, home address or local sports team. Whilst at Hillsborough Stadium, mascots and ball persons are accompanied at all times by at least two members of staff who have a valid DBS Check. Staff who are responsible for mascots and ball persons on a matchday are also required to have a good level of understanding and awareness of safeguarding children.

Academy Communication Via Social Media

SWFC Academy is committed to the welfare and safety of all children, both within the Academy and at the Club as a whole. The Academy also realises the importance of communication and works closely with parents, carers, host families, schools and local authorities to ensure that the wellbeing of all children is paramount.

In the interests of ensuring professional boundaries are maintained employees must not become friends with, add to their social media network or otherwise communicate via personal devices with any potential, current, or former young people (under the age of 19) or parents unless a clear reason exists, for example, they are a relative or family friend. Entering into such a relationship may lead to abuse of an employee's position of trust and breach the standards of professional behaviour and conduct expected by the Club.

Transport

SWFC has a Player Care Administrator who is responsible for overseeing transport arrangements across the Academy, including registered Academy players and players attending the Club on trial. The Player Care Administrator attends weekly meetings with the Designated Safeguarding Officer in order to report on the Academy's transport programme and other relevant matters.

When children are being transported on behalf of the Sheffield Wednesday FC Academy they shall, where possible, be accompanied by their team manager, a coach or a designated tour leader. In some cases, where children need to be transported unaccompanied, this will be with an approved travel company (who have signed up to relevant Academy Policies), or by a member of Club staff



who has a satisfactory DBS check and has been issued with (and received training on) the Academy Transport Policy. In either case a child will only be transported under these circumstances with the specific prior consent of their parent or guardian. Although outside of the sphere of responsibility for local education authorities, the Club also provides a duty of care for young persons when travelling on behalf of SWFC. Children shall be accompanied at all times by an Activity Leader. Only vehicles and drivers approved under the SWFC Transport Policy will be used to transport children. Under no circumstances will a member of staff use a private vehicle to convey children engaged in an Activity being delivered by SWFC.

Medical

There will be occasions where medical treatment is necessary during training sessions and weekend fixtures and unfortunately, due to staffing numbers, SWFC are unable to guarantee that two members of staff are present during treatment sessions.

All members of the medical department have a valid DBS check and are required to attend the FA's Safeguarding Children awareness workshop and internal Safer Working Practice training. SWFC are fully committed to equal opportunities for all individuals and, as such, employ both male and female staff to work within the medical department.

SWFC are more than happy for parents and carers to attend pre-booked medical treatments if required. If, due to the first team's schedule, this is not possible an alternative appointment may need to be arranged.

In the event that a safeguarding disclosure is made to a member of the Medical Department, the staff member will always report such disclosure to the Designated Safeguarding Officer.

There may be occasions where medical treatment is necessary during an Activity or event run by Sheffield Wednesday. They will ensure a level of medical cover is available at all its activities including at least one suitably trained Emergency First Aider. All relevant and necessary medical information of participants will be treated in confidence but provided to the Event Lead if necessary, e.g. asthmatic participants. Specialist medical advice and further information will be sought when working with children who have additional needs or disability.

Host Families

Prior to the commencement of an agreement between the Academy and a host family an Enhanced DBS plus barred list check is carried out on the designated house parent along with an enhanced check on any other person residing at the house who is over 16 years of age.

At present the Academy does not have any accommodation arrangements that fall within the regulations of Private Fostering, however in the event that a such a situation did occur then the Club would ensure that suitable dialogue takes place with the relevant Local Authority to ensure that all statutory requirements are met.

References from previous employers and local authorities (where applicable) are also sought. House visits and full Health & Safety risk assessment are also conducted by the Designated Safeguarding Officer and a guidance manual is issued.



Youth Loans, Trials, and Work Experience

If an Academy Player or young Professional under the age of 18 joins another club on trial, work experience, or a Football League Youth Loan, the Academy will seek written parental consent (additional to the standard consent sought at the start of every season) prior to the activity taking place. Consideration will also be given to the player's education programme, travel and accommodation arrangements. If the new club is not located within a reasonable travelling distance from the player's current address, SWFC will insist that, where possible, players are placed in host family accommodation during their time away from the Club and not in hotel accommodation, and as good practice the Club should designate a member of Academy Staff who will be nominated by the Designated Safeguarding Officer, to check on the players on a regular (weekly) basis, not just for game situations but for their general welfare whilst on loan, trial or work experience.

For players under the age of 18 who are joining the Club on trial, parental consent will be sought prior to the trial taking place, along with suitable checks e.g. medical forms. Where accommodation is required during the trial period, this will be in designated host family accommodation or, if the player's parent/guardian is also travelling with the player then a local hotel may be used as an alternative. Transportation will be arranged during the trial period via the Academy and agreed with parents/guardians.

Uner18, Under-21 and First Team Progression

As players progress through the Academy system, they may have the opportunity to train and play with the adult provisions of the Club. This may raise concerns for the individual and/or their parent/guardians as they will be entering an adult provision and as such may witness adult behaviours and language. The Club will support the player(s) during this transition and ensure that the welfare of the player concerned is paramount. Parents will be included, and consent sought.

Other Safeguarding contacts in football: Whilst any safeguarding concern should be raised with the Club Safeguarding contacts in the first instance, we recognise that this may not always be possible or appropriate.

This policy should be read in conjunction with the following policies:

- Whistle-Blowing Policy
- Anti-Bullying Policy
- Safer Recruitment Policy
- Late collection of Children Policy
- IT and social media Policy
- Equal Opportunities Policy
- Late Collection of Children Policy
- Complaints Policy
- Prevent Policy
- FGM Policy
- Safeguarding Adults at Risk Policy
- Health and Safety Policy
- Trips, Tours and Tournaments Policy



- GDPR and Data Sharing Policy
- Unaccompanied Children Attending Matches Policy
- Responding to Youth Sexual Imagery

SWFC recognises the definition and follows the guidance relating to “Position of Trust” as defined in the Sexual Offences Act 2003.

Emergency Contact Details

- Sheffield Children’s Services – 0114 203 9591
- Sheffield Children Safeguarding Partnership www.safeguardingsheffieldchildren.org
- Sheffield Safeguarding Hub – 0114 273 4855
- LADO – Hannah Appleyard – 0114 273 4850
- FA case management team – Duty Manager 0800 083 5902
- FA County welfare officer – Claire MacRory – claire.macrory@sheffieldfa.com
- DSO for EFL Trust – Tara Lawson 07964905652
- PFA: Tel:07500 000 777 <https://www.thepfa.com/wellbeing>

KEY WIDER SAFEGUARDING /HELPLINE CONTACTS

- help@nspcc.org.uk/ childline.org.uk 0808 800 5000
- Sheffield Children Safeguarding Partnership Adult Safeguarding Partnership www.safeguardingsheffieldchildren.org
- British Transport Police (non- emergency) www.btp.police.uk www.police.uk/contact/101 101 0800 405040
- NSPCC helpline – helping adults protect children 24 hours a day. For help and support and advice regarding any concerns about children that you think may be at risk of harm: help@nspcc.org.uk. Text 88858 or Call 0808 800 5000
- UK Safer Internet Centre professional advice line – helpline for professionals working with children and young people in the UK with any online safety issues they may face themselves or with children in their care: helpline@saferinternet.org.uk or Call 0844 381 4772
- Police Anti-Terrorist Hot Line: 0800 789 321
- National Domestic Abuse Helpline: free and in confidence, 24-hours a day: [0808 2000 247](tel:08082000247)
- Young Minds: youngminds.org.uk
- Disrespect Nobody: disrespectnobody.co.uk
- Mind: 0300 123 3393 <https://www.mind.org.uk>
- Rethink 0808 801 0440. Calls are free from a landline or mobile
- The Samaritans: 116 123 <https://www.samaritans.org>
- ChildLine: Tel: 0800 1111 <https://www.childline.org.uk> NSPCC: Tel: 0808 800 5000 <https://www.nspcc.org.uk>
- External Resources FA Safeguarding Children Guidelines: <https://www.thefa.com/football-rules-governance/safeguarding/section-11-the-complete-downloadsdirectory>
- Working Together to Safeguard Children 2018: <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
Information Sharing Guidance for Managers and Practitioners:



- [https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice-Keeping-Children-Safe-in-Education-\(KCSIE\)-2022](https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice-Keeping-Children-Safe-in-Education-(KCSIE)-2022)
- https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/108004_7/KCSIE_2022_revised.pdf Sources of further information and advice:

Legislative Polices

Health & Safety at Work Act 1974

Data Protection Act 2018

Safeguarding Vulnerable Groups Act 2006

Equality Act 2010

Domestic Abuse Act 2021

Sexual Offences Act 2003

Keeping Children Safe in Education Children Act 1989

Children Act 2004

Education Act 2002 <https://www.gov.uk/government/publications/protectingchildren-from-radicalisation-the-prevent-duty>

Police Act 1997

Protection of Freedoms Act 2012

Counter Terrorism and Security Act 2015

Counter Terrorism and Security Act 2015 - Part 5

Department for Education: Child sexual exploitation Home Office: Criminal Exploitation of children and vulnerable adults Female Genital Mutilation Act 2003

Home Office: Mandatory Reporting of FGM The Right to Choose: Statutory guidance for dealing with forced marriage

Department for Education: Preventing and tackling bullying Department for Education: Cyberbullying Sexting in schools and colleges: responding to incidents and safeguarding young people Indecent images of children: guidance for young people <https://thecpsu.org.uk/helpadvice/topics/safer-recruitment/> <http://www.nspcc.org.uk/preventing-abuse/child-abuse-andneglect/> <http://www.nhs.uk/conditions/social-careand-support-guide/pages/vulnerablepeople-abuse-safeguarding.aspx> <http://www.forwarduk.org.uk/>

<https://www.ceop.police.uk/> <http://www.karmanirvana.org.uk/>

Key Contacts in the Club and Community Programme

Tracey Fidler

Lead Designated Safeguarding Officer and Equality Lead.

Tracey.fidler@sefc.co.uk or 07495091869

Lindsey Hinton

Club Secretary and Senior Safeguarding Manager

Lindsey.hinton@swfc.co.uk or Telephone 01143240760

Dan Potts

Academy Head of Education and Welfare and Mental Health First Aider.

Dan.potts@swfc.co.uk or 07891676242



Kerry Robinson

Academy Player Care Lead and Mental Health First Aider.
Kerry.robinson@swfc.co.uk or 07930185464

Louise Carpenter

Human Resource Manager (HR)
Louise.carpenter@swfc.co.uk or 01143240705

Richard Stanford

Operations Manager (Single Point of Contact for PREVENT)
Richard.stanford@swfc.co.uk or 07795632738

Marcus Brameld

Head Of Community
Marcus.brameld@swfc.co.uk

Sheffield Children Safeguarding Partnership

www.safeguardingsheffieldchildren.org
scsp@sheffield.gov.uk
0114 273 4450

Adult Safeguarding Partnership

www.sheffield.gov.uk/home/social-care/adult-safeguarding
0114 273 4908

British Transport Police

www.btp.police.uk
0800 4

Police (non-emergency)

www.police.uk/contact/101 101

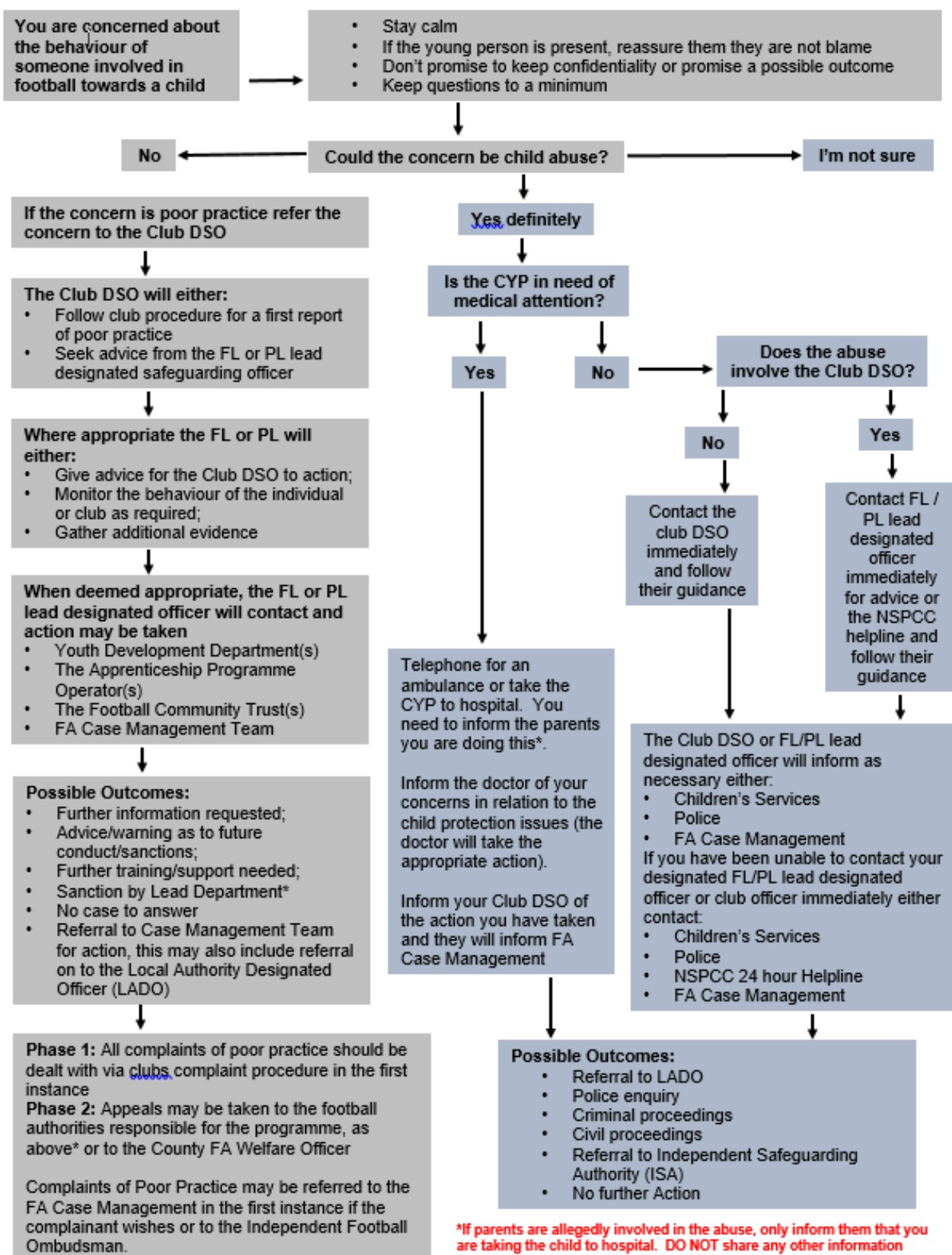


SAFEGUARDING INCIDENT FORM

<input type="checkbox"/> Accident	<input type="checkbox"/> Incident	<input type="checkbox"/> Safeguarding Concern
<input type="checkbox"/> Club	<input type="checkbox"/> Academy	<input type="checkbox"/> Community
Date of incident:		
Name and details of the person(s) the report is being made about:		
Account of incident or concern: (give clear details relating to what happened, where, when, who was involved, what was said, nature of injury or behaviour, any witnesses etc, keep it factual).		
Action taken:		
Name of person making the report:		
Signed:		
Date:		
ADMIN USE ONLY		
Designated Safeguarding Officer:		
Signed:		
Date:		
Further action taken:	 	



FLOW CHART





DOCUMENT CONTROL

CHANGES HISTORY

Version	Date	Amended by	Recipients	Purpose
1.0	March 2016	Richard Groves - DSO	All	
1.1	April 2017	Richard Groves – DSO	All	
1.2	April 2018	Richard Groves – DSO	All	
1.3	May 2018	Matthew Foster - DSO	All	Update to meet legislation
1.4	2019	Dee Ashton – DSO	All	
1.5	October 2022	Tracey Fidler -DSO	All	New DSO updated, Removed Community DSO. Updated Contacts. Separated Adults from Children into 2 separate Safeguarding polices.

APPROVAL

This document requires the following approvals.

Name	Position	Date Approved	Version
Laura Ibbotson	HR Manager	12 May 2018	1.3
Lindsey Hinton	Club Secretary / SSM	October 2022	1.5
Dejphon Chansiri	Chairman	October 2022	1.5

DISTRIBUTION

This document has been distributed to:

Name	Position	Date	Version
All Employees in SWFC, Intranet and Website	Various	October 2022	1.5

