Brentford Football Club & Brentford FC Community Sports Trust Safeguarding Children and Adults Policy

Foreword

This Safeguarding Policy (Policy) reflects the joint ethos of Brentford Football Club and the Brentford FC Community Sports Trust. Both Boards have resolved to endorse this document in accordance with their articles and expect all staff in the workforce community at Brentford to share the commitment to safeguard and promote the welfare of children, young people and adults at risk.

The Club and Trust's Safeguarding Children Policy and Safeguarding Adults Policy are now integrated to ensure the safety and protection of vulnerable groups.

Application of Policy

This Policy applies to Brentford FC Limited which includes Brentford FC's first team and Academy (including the B team) and the Brentford FC Women's first and B teams (together, in this document, 'the Club' or "Brentford Football Club" or "Brentford") and to Brentford FC Community Sports Trust (a registered charity, in this document 'the Trust').

Any references to 'the Club' are therefore intended to apply to the Club and to the Trust.

Version Number	Owner	Date
1.0	Adam Brown	September 2025
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Safeguarding Statement

At Brentford Football Club and the Brentford FC Community Sports Trust we want children, young people and adults at risk who engage with us to be safe and happy.

Everyone has the right to be safe. This applies to all environments, from home to school and in football. All adults who spend time with young people have a responsibility to make sure their well-being is prioritised. This means listening to people, making sure they are safe and taking action when required.

This is 'safeguarding'.

We will ensure people are treated with respect, that their voices are heard, and we will create a safe, welcoming environment which is inclusive, enjoyable, safe, respectful, and supportive.

The Club is committed to the safeguarding and welfare of everyone and requires all staff, volunteers and others associated with the Club to share and endorse this commitment. As part of this commitment, all staff are expected to undertake regular safeguarding and welfare-related training and to ensure the environments in which they work remain safe at all times. This includes ensuring best practices are adopted and incidents or concerns are proactively reported. At Brentford, safeguarding is everybody's responsibility.

Introduction

Brentford Football Club acknowledges its responsibility to safeguard the welfare of everyone who engages with the Club and Trust. It is committed to working to provide a safe environment for all.

The key principles of Brentford's Safeguarding Policy are:

- The welfare of everyone in the care of or linked to the Club and Trust must always be the paramount consideration.
- Everyone has the right to be protected from abuse regardless of their age, gender, disability, race, sexual orientation, faith, or belief.
- All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately.
- A partnership approach to working with other organisations, children, young people, adults at risk and their parents/carers is essential to effective safeguarding.

We acknowledge that everyone who engages with the Club and Trust should be in an enjoyable and safe environment and be protected from poor practice and abuse. Brentford recognises this is the responsibility of all employees, workers, consultants, contractors, and volunteers who encounter people in Club and Trust-related activities.

Brentford has a role to play in safeguarding everyone by protecting them from physical, sexual, or emotional harm and from neglect, exploitation, or bullying. Our staff will be made aware of the policy during their induction and must comply with this policy and accompanying procedures. This will be supplemented by training and additional guidance.

This document is compliant with legislation including, but not limited to, the Children Acts 1989 and 2004; The Care Act 2014, statutory guidance such as Working Together to Safeguard Children, Keeping Children Safe in Education and governing body rules and regulations including the Premier League safeguarding standards and rules, and FA (Football Association) Regulations. This document should be read in conjunction with related policies and procedures.

Scope

This document will demonstrate our commitment to safeguarding, and our expectations for best practice. Brentford acknowledges its responsibility to safeguard the welfare of everyone who engages with the Club and Trust. It is committed to working to provide a safe environment for all.

This policy applies to all locations where Brentford Football Club and Brentford FC Community Sports Trust have an interest or control. Any third-party making use of spaces in which we have control must comply with this policy.

We will review our policies at the end of each season and sooner if there is a significant incident of concern. We are committed to being a reflective, learning organisation.

What is Safeguarding?

Safeguarding is the action that an organisation takes to promote the welfare of children, young people, and adults at risk to protect them from harm including physical, emotional, sexual, and financial harm, and neglect. This includes making sure the appropriate policies, practices, and procedures are put in place.

Safeguarding and promoting the welfare of children, young people and adults at risk is defined as:

- protecting people from maltreatment

- preventing the impairment of people's mental and physical health or development
- ensuring children grow up in circumstances consistent with the provision of safe and effective care.
- taking action to enable everyone to have the best outcomes.

The term 'children' refers to everyone under the age of 18.

The Care Act 2014 refers to adults at risk rather than vulnerable adults. This change allows further consideration of the harm adults can face. Adults can be at risk in a particular context such as an abusive relationship as well as because of health issues such as dementia. Adults can experience the same types of abuse and harm as children.

At Brentford, the referral process for concerns about children and adults is the same, the Safeguarding team can give advice about concerns relating to children and adults.

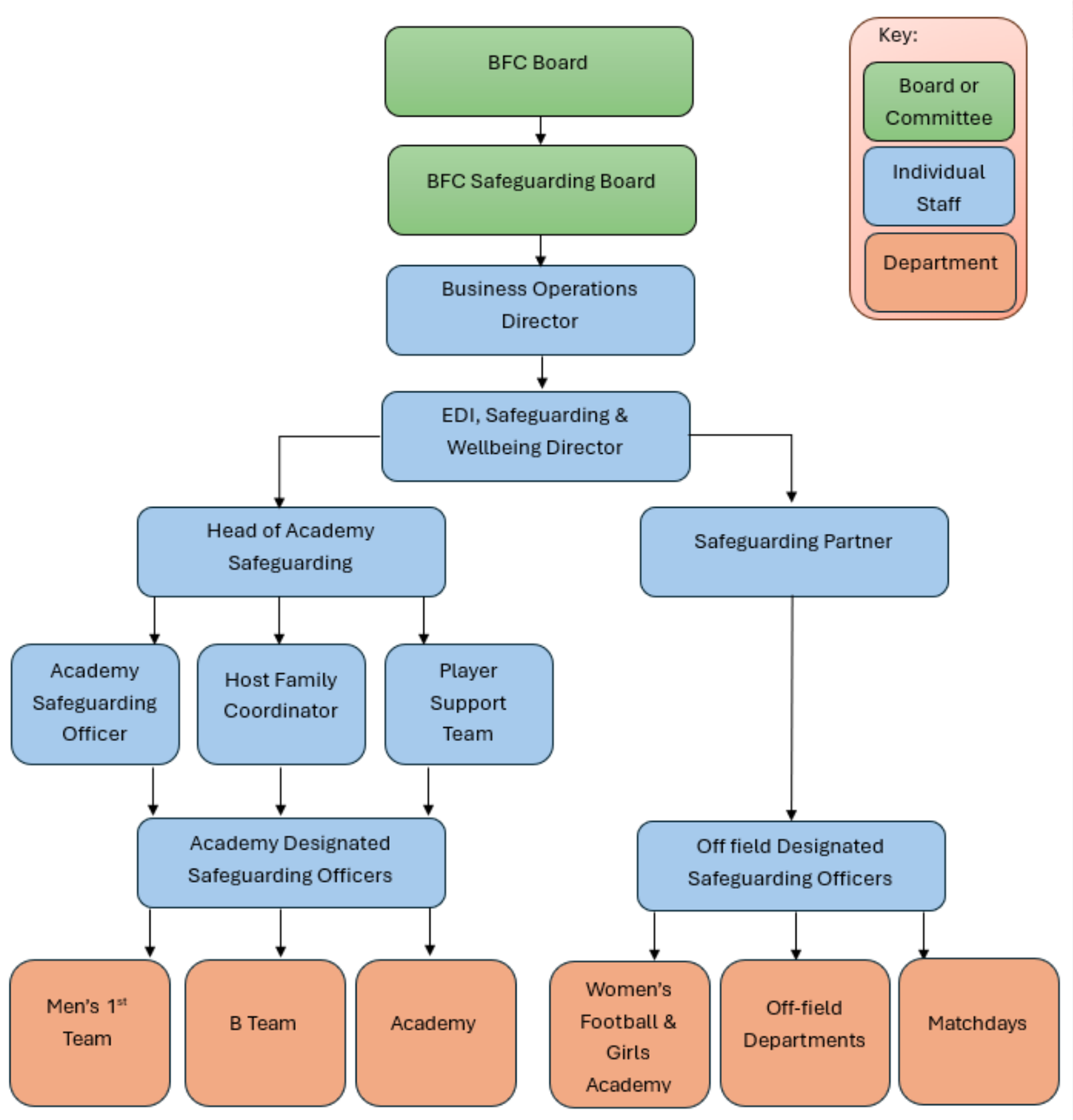
Safeguarding is a broad term that includes concerns relating to safety, welfare, and wellbeing that can range from minor worries to serious concerns. If we can address minor worries in a timely manner, we can ensure risks do not escalate.

Everyone at Brentford has a responsibility to promote people's welfare, to keep them safe and to act in a manner that considers and protects them. Not everyone has contact with the public as part of their role, but we all have instances where we encounter people in Club and Trust spaces, whether in or around the stadium, at community events, in the office or at the Training Ground.

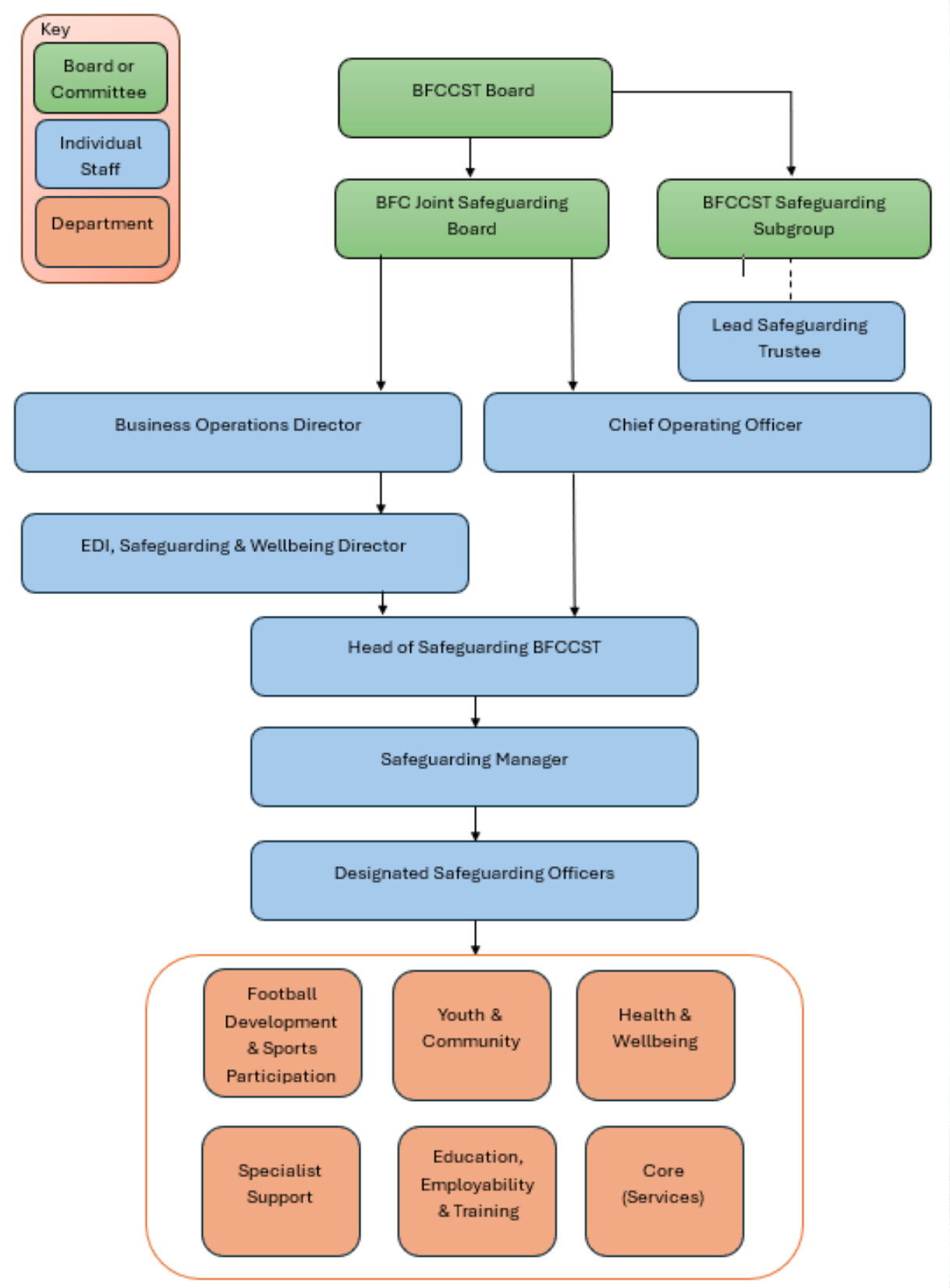
Governance

The structure and governance of safeguarding within the Club and Trust is paramount to ensure all relevant legislation, guidance and policies are followed. The Club and Trust work jointly in their strategic approach to Safeguarding. Brentford's governance structure provides visibility of all aspects of safeguarding through a defined management model which allows operational concerns and trends to be communicated to senior management to enable strategic decision making to take place.

BFC Safeguarding Governance Structure



Trust Governance structure



Safeguarding Roles and Responsibilities

Every member of staff, volunteer or contractor working for Brentford has a duty to safeguard everyone who attends the Club, Trust, or any other activities it has arranged.

BFC Safeguarding Board

This forum is charied by the Business Operations Director and brings together all the relevant Head of Departments to oversee safeguarding across and promote safeguarding at all levels of Brentford FC and the Brentford FC Community Sports Trust (BFCCST).

The Board is responsible for ensuring that all statutory safeguarding requirements are met and exceeded, including but not limited to the Premier League Safeguarding Standards, Working Together to Safeguard Children, Keeping Children Safe in Education, and the Prevent Duty.

It is accountable to the BFC Board and the BFCCST Board of Trustees and escalates significant policy or strategic decisions to them for approval.

The responsibilities of the Safeguarding Board are:

- Provide strategic advice, ideas and initiatives to support alignment of safeguarding with the Club and BFCCST strategies, while driving a vision that exceeds minimum safeguarding and Prevent Duty requirements.
- Ensure the Club fulfils its statutory safeguarding obligations, including compliance with the Premier League Safeguarding Standards, CCOP, Working Together to Safeguard Children, Keeping Children Safe in Education and the Prevent Duty.
- Review progress against the Safeguarding Strategy, Premier League Safeguarding Standards, CCOP requirements and associated action plans, providing appropriate challenge and oversight.
- Monitor and review safeguarding referral data, trends, patterns and local safeguarding context to ensure timely and effective organisational responses driven from a senior leadership level.
- Oversee the quality and effectiveness of safeguarding policies, procedures, audits and action plans, ensuring they remain current, compliant and focused on the voices and experiences of children, young people and adults at risk.
- Receive updates from the Business Operations Director and EDI, Safeguarding & Wellbeing Director and provide strategic guidance on

safeguarding and Prevent-related policy, practice, performance and culture across the organisation.

- Ensure safeguarding reporting and communication are transparent, timely and effective, demonstrating progress against strategic objectives and key priorities.
- Promote and embed a proactive safeguarding culture at all levels of the organisation, ensuring all staff understand and take responsibility for safeguarding.
- Review workforce development, training and safeguarding capacity to ensure staff have the confidence, awareness, attitudes and tools required to maintain effective safeguarding practice.
- Maintain oversight of the organisation's approach to the Prevent Duty, including the promotion and embedding of Fundamental British Values.
- Establish and maintain relationships with external safeguarding networks, forums and partners to support learning, best practice, benchmarking and professional development opportunities.

BFCCST Safeguarding Subgroup

This forum, chaired by the Lead Safeguarding Trustee, brings together all the relevant Head of Departments to discuss the strategic and tactical safeguarding delivery within their area of business and the Trust overall, to share best practice where identified and identify gaps where further action is needed.

The Head of Safeguarding (BFCCST) shares information and risk analysis on identified cases to identify connectivity, themes, and trends to enable the group to identify further action that could be undertaken to ensure the continued welfare of all who attend BFCCST.

The group ensures that all staff are trained and are competent to discharge their safeguarding responsibilities and it also focuses on the following areas:

- To agree and implement the Safeguarding and Prevent Training schedule across the Trust.
- Ensure the Trust is compliant with statutory requirements and Premier League and FA standards, including implementing recommendations from the independent annual audits.
- Develop policies and procedures in line with current guidance in readiness for submission to the Safeguarding Board.
- To review any statutory safeguarding referrals that have been made to ensure they have met required standards and to identify any lessons learned.

- To implement and manage the safeguarding communication and engagement plan and action plan.
- Ensure structures are in place to capture the views of children, young people, and adults at risk.
- Review safeguarding data for each quarter.

Business Operations Director

To provide executive leadership and oversight of safeguarding across both Club and Trust, ensuring safeguarding remains a strategic priority and that the EDI, Safeguarding & Wellbeing Director is appropriately supported, resourced and held to account.

Main Responsibilities

- Chair the BFC Safeguarding Board, setting its agenda and making sure it meets its responsibilities as set out in this Policy.
- Provide line management to the EDI, Safeguarding & Wellbeing Director, including regular supervision, objective setting, support and challenge.
- Ensure that safeguarding decisions proposed or taken by the EDI, Safeguarding & Wellbeing Director follow the Club's policies and procedures and meet statutory and football authority requirements.
- Act as the senior escalation point for complex, high-risk or sensitive safeguarding matters, including professional concerns about staff. Consult the Senior Safeguarding Lead where appropriate.
- Work with the Senior Safeguarding Lead and Lead Safeguarding Trustee to make sure safeguarding risks, performance and key issues are reported to the Club and Trust Boards.
- Ensure safeguarding is reflected in the Club's business planning, risk management and governance reporting, and advise on resourcing and capacity.
- Oversee the approval and regular review of safeguarding policies and procedures before they are presented for Board approval.
- Promote a culture across the organisation where safeguarding is everyone's responsibility.

EDI, Safeguarding & Wellbeing Director

To work across both Club and Trust to provide a clear sense of direction and purpose that assists both organisations to deliver their safeguarding strategies and implement policies and procedures that aim to promote and protect the welfare of children, young people, and adults at risk.

Main Responsibilities

- Lead the development and delivery of safeguarding strategies and advise re capacity.

- Ensure compliance with all statutory obligations under relevant legislation, rules, regulations, standards, and guidance as laid down by the football authorities under which the organisation is bound (i.e., the Premier League and the FA)
- Proactively identify and mitigate safeguarding risks to individuals and to the organisation.
- Lead on the development, implementation and regular review of safeguarding policies, procedures and practices and ensure they meet statutory and football authority requirements and are aligned with best practice.
- Ensure all internal and external stakeholders receive regular, relevant education in line with their level of role, responsibility and engagement with children, young people and/or adults at risk.
- Provide regular direction, reports and updates to the Safeguarding Board and operational groups.
- Work with People and Heads of Departments to develop and implement safer recruitment and induction practices.
- Work to embed a culture of strong safeguarding awareness, engagement and working practices.
- Provide support, guidance, and direction to staff in respect of all safeguarding incidents, concerns or allegations and ensure full evaluation of any lessons learnt.
- Ensure all Designated Safeguarding Officers are appropriately trained, supported, regularly supervised, and facilitate regular safeguarding meetings.
- Develop and maintain relationships with statutory and football authorities (such as the Police, Local Authorities, NSPCC the Premier League, the Football League, and the FA)
- Ensure continued professional development by regularly attending relevant training and keeping up to date with current safeguarding issues and risks as well as changes to legislation, statutory guidance, and best practice.

Head of Academy Safeguarding

- Supporting the EDI, Safeguarding & Wellbeing Director and the relevant Heads of Departments to promote the welfare of people.
- Implementing reporting and recording procedures and where applicable be the first point of contact.
- Report safeguarding concerns or poor practice to the EDI, Safeguarding & Wellbeing Director.
- To maintain a high profile as the recognised point of contact, freely available to all individuals wishing to raise concerns or seek help and guidance on any questions connected with the Safeguarding Policy and Procedures.
- To attend safeguarding meetings within the safeguarding structure.

- Communication with outside agencies through the direction of the EDI, Safeguarding & Wellbeing Director.
- Attend meetings with linked external agencies including LADO etc. through the direction of the EDI, Safeguarding & Wellbeing Director.
- Promote safe working practice guidance, Code of Conduct and assist with risk assessments of activities.
- Assist the EDI, Safeguarding & Wellbeing Director in keeping staff's safeguarding training up to date, including the FA Safeguarding Children Certificates and first aid for coaches and PL requirements. Identify areas for development / training needs.
- Delivery of some staff training (where identified & required).
- To communicate clearly with all staff, volunteers, parents/carers, and vulnerable groups on matters related to safeguarding, providing advice and support when necessary.
- Carry out monitoring visits to relevant sites/activities.

Head of Safeguarding (BFCCST)

- Supporting the Trust Chief Operating Officer and the Heads of Departments to promote the welfare of people.
- Implementing reporting and recording procedures.
- Report safeguarding concerns or poor practice to the Trust Chief Operating Officer.
- To maintain a high profile as the recognised point of contact, freely available to all individuals wishing to raise concerns or seek help and guidance on any questions connected with the Safeguarding Policy and Procedures.
- To attend safeguarding meetings within the safeguarding structure.
- Manage communication relating to safeguarding with outside agencies, including oversight of wider staff communication.
- Attend meetings with linked external agencies including LADO etc. where necessary.
- Promote safe working practice guidance, Code of Conduct and assist with risk assessments of activities.
- Assist the HR team in keeping staff's safeguarding training up to date, including the FA Safeguarding Children Certificates and first aid for coaches and PL requirements. Identify areas for development / training needs.
- Delivery of some staff training (where identified & required).
- To communicate clearly with all staff, volunteers, parents/carers, and vulnerable groups on matters related to safeguarding, providing advice and support when necessary.
- Carry out monitoring visits to relevant sites/activities.

Safeguarding Partner

- Supporting the EDI, Safeguarding & Wellbeing Director and the relevant Heads of Departments to promote the welfare of people.

- Implementing reporting and recording procedures and where applicable be the first point of contact.
- Report safeguarding concerns or poor practice to the EDI, Safeguarding & Wellbeing Director.
- To maintain a high profile as the recognised point of contact, freely available to all individuals wishing to raise concerns or seek help and guidance on any questions connected with the Safeguarding Policy and Procedures.
- To attend safeguarding meetings within the safeguarding structure.
- Communication with outside agencies through the direction of the EDI, Safeguarding & Wellbeing Director.
- Attend meetings with linked external agencies including LADO etc. through the direction of the EDI, Safeguarding & Wellbeing Director.
- Promote safe working practice guidance, Code of Conduct and assist with risk assessments of activities.
- Assist the EDI, Safeguarding & Wellbeing Director in keeping staff's safeguarding training up to date, including the FA Safeguarding Children Certificates and first aid for coaches and PL requirements. Identify areas for development / training needs.
- Delivery of some staff training (where identified & required).
- To communicate clearly with all staff, volunteers, parents/carers, and vulnerable groups on matters related to safeguarding, providing advice and support when necessary.
- Carry out monitoring visits to relevant sites/activities.

Trust Safeguarding Manager

- To promote and ensure that staff understand that safeguarding of all children, young people, and adults at risk in the Trust more broadly is everyone's responsibility.
- To lead and provide guidance to other staff on responses to safeguarding issues or concerns that are raised within the Trust.
- Maintain accurate, confidential, and up-to-date records on all safeguarding incidents, concerns, or allegations.
- To assist the Trust Head of Safeguarding and HR with any investigations including (but not limited to) working with the LADO, FA Safeguarding Team, Premier League Foundation and any other statutory or regulatory authorities.
- To maintain a high profile as the recognised point of contact, freely available to all individuals wishing to raise concerns or seek help and guidance on any questions connected with the Safeguarding Policy and Procedures.
- To attend safeguarding meetings within the safeguarding structure.
- Delivery of some staff training (where identified & required).
- To communicate clearly with all staff, volunteers, parents/carers, and vulnerable groups on matters related to safeguarding, providing advice and support when necessary.

Academy Safeguarding Officer

- To promote and ensure that staff understand that safeguarding of all children, young people, and adults at risk in the Academy and Club more broadly is everyone's responsibility.
- To lead and provide guidance to other staff on responses to safeguarding issues or concerns that are raised within the Academy.
- Maintain accurate, confidential, and up-to-date records on all safeguarding incidents, concerns, or allegations.
- To assist the Head of Academy Safeguarding and Welfare and People team with any investigations including (but not limited to) working with the LADO, FA Safeguarding Team, Premier League and any other statutory or regulatory authorities.
- To support the Needs Assessment of each player entering the Academy.
- Be actively involved in the different age groups/phases Wellbeing Multidisciplinary Team (WMDT) Meeting process, providing expert safeguarding and welfare advice to the WMDT members to then support players.

Host Family Coordinator

- To lead on the recruitment, assessment, and management of the host families.
- Being the first point of contact for any issues that arise relating to host family arrangements, reporting into the Head of Academy Safeguarding and Academy Player Support Manager as appropriate.

Designated Safeguarding Officer

- Ensure a safe environment for people to flourish.
- Identification and reporting of safeguarding concerns.
- Maintaining, overview, and upkeep of records relating to safeguarding concerns.
- Attendance at meetings as directed by the Head of Safeguarding / Safeguarding Manager linked to safeguarding issues.
- Communication with outside agencies through the direction of the Safeguarding Team.
- Contact and attend meetings with linked external agencies through the direction of the EDI, Safeguarding & Wellbeing Director.
- Promotion of safe behaviours & safer practice within their department.
- Delivery of staff safeguarding awareness (where identified & required).
- To attend safeguarding meetings within the safeguarding structure.
- Advice and guidance for staff re safeguarding issues.

Senior Safeguarding Lead (SSL)

- To take leadership responsibility for the Club's safeguarding provision (in consultation with the Club's Business Operations Director and EDI, Safeguarding & Wellbeing Director) and actively champion safeguarding at Board level.
- To provide strategic oversight of the EDI, Safeguarding & Wellbeing Director (who is line managed by the Business Operations Director), ensuring that decisions proposed/taken by the EDI, Safeguarding & Wellbeing Director are in accordance with the Club's relevant policies and procedures, as well as applicable statutory and regulatory responsibilities.
- To ensure that the Club's safeguarding provision is resourced adequately across all Club activities within which children, young people and adults at risk are engaged.

Lead Safeguarding Trustee (BFCCST)

- To champion the importance of safeguarding within the organisation, promoting a culture of safety and wellbeing for all participants and to chair the safeguarding sub-group at the Trust.
- To ensure that the Trust's safeguarding strategy aligns with legal requirements and best practice, advocating for continuous improvement in safeguarding policies and practice.
- To ensure that the Trust complies with safeguarding legislation, regulations, and Premier League Charitable Fund (PLCF) requirements, including those arising from the annual audit .
- To work closely with the EDI, Safeguarding & Wellbeing Director and the Head of Safeguarding (BFCCST), offering support, guidance, and oversight on safeguarding matters and ensuring that they have adequate resources.
- To receive regular reports on safeguarding incidents, ensuring they are handled appropriately, investigated, and learnings are implemented to prevent future occurrences.
- To ensure that the Board of Trustees is regularly updated on safeguarding matters, including risks, incidents, and the effectiveness of safeguarding policies.
- To ensure a joint approach across Club and Trust re safeguarding to ensure best practice for children and adults at risk and effective use of resources.
- Oversee and/or participate in external safeguarding audits to ensure that safeguarding procedures are robust and being followed throughout the Trust.

Learning & Development

All staff will undertake safeguarding and prevent training as part of their induction process. Staff who perform the role of Designated Safeguarding Officer (DSO)/Assistant Designated Safeguarding Officer (ADSO) will receive enhanced safeguarding training commensurate to their role. Additional training will be provided on at least a two-year basis.

The EDI, Safeguarding & Wellbeing Director will be responsible for managing all safeguarding training. The EDI, Safeguarding & Wellbeing Director will liaise with departmental Heads to ensure scheduling of all training aligns with the departmental and Club's priorities to avoid conflict and increase participation. This will be set out in the workforce development programme across the Club and scheduled within a training calendar. Training for all staff includes addressing sexual misconduct and relationship-based harm.

Data Protection

Confidentiality and Data Protection

While sharing information is crucial to safeguard children, it is equally important that this is done in line with government guidance, Information Sharing: A Guide for Practitioners 2018. Data protection is never a reason for not sharing safeguarding concerns, but data protection is also a protected right for children and families and must be adhered to (Data Protection Act 2018).

Confidentiality within a safeguarding context is key to lawful practice under the Data Protection Act and the Human Rights Act, and to maintaining a relationship of trust and respect with individuals. Sharing information should take place with the consent of parents, and in communication with children, wherever practicable. While consent is not required for the sharing of child protection concerns, consent and transparency are always preferred to achieve best practice.

Storage of Information

Child protection information will be stored and handled in line with the Data Protection Act 2018 and UK GDPR.

- Information will be stored separately from other records and in a secure place with access granted to designated people, in line with the Data Protection Act 2018 – information will be accurate, regularly updated/corrected, the storage is relevant and secure. See NSPCC Guidance on Child Protection Records Retention and Storage for more information.
- All safeguarding and child protection data relating to children, families and carers will be stored on the MyConcern, which is a secure and encrypted case management system registered with the Information Commissioner's Office (ICO) and fully compliant with the Data Protection Act 2018.

See the current Data Protection Policy for more information.

Safer Recruitment

Here at Brentford, it is vital we employ the best staff. All staff need to have characteristics and values that make them safe and suitable to work with young people. We ensure every person working directly with young people and adults at risk are safe by:

- Disclosure and Barring Service (DBS) and barred list checks, with the level of check dependent on the role.
- Completion of an application form, including applicants' background and job history.
- Completion of a self-disclosure form by applicants about past offences.
- Social media checks.
- Identity checks, including right to work in the UK and qualification checks (where relevant).
- Hiring managers to complete Safer Recruitment training.
- Safeguarding-related interview questions.
- Obtaining at least two professional references (with one from the most recent employer)
- Risk assessments and DBS panel meetings where concerns arise during vetting.
- All records and relevant checks are kept in our Single Central Record (SCR).
- No one starts regulated activity until all checks are cleared.

The Club's nominated Safer Recruitment Lead is our Associate Director (People).

Professional Concerns (i.e., allegations against a staff member)

Where safeguarding concerns/allegations are raised which relate to any member of staff including both on and off pitch, volunteers, and contractors, the organisation will robustly investigate, appointing a case manager to assess the risk and take the lead in any investigation that may be necessary.

The concerns/allegations will be initially assessed to threshold their level of seriousness. This will then fall into one of two areas, namely:

1. Allegations that may meet the harm threshold.
2. Allegations/concerns that do not meet the harm threshold – referred to for the purposes of this policy as 'low-level concerns.'

Any concern that is being dealt with as a 'low level' concern may at any time be escalated to the higher threshold if the emerging information or circumstances warrant such action.

The Club may need to share safeguarding responsibilities with third party organisations in cases where there is an allegation against an individual from a third party agency. The Club remains responsible for gathering the facts and managing the safeguarding process while working closely with the employment agency or business, which will usually lead on any disciplinary action.

Concerns that may meet the harm threshold.

Where it is alleged that anyone working in the club with children under 18 years of age, including all staff, volunteers and contractors has:

- behaved in a way that has harmed a child, or may have harmed, a child; and/or
- possibly committed a criminal offence against, or related to, a child; and/or
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children; and/or
- behaved in a manner that discriminates against a child on the basis of one or more of their protected characteristics (as defined by the Equality Act 2010).

The club will have a legal duty to investigate the circumstances of the concern, liaise with the Local Authority Designated Officer (LADO) and then inform the FA Safeguarding Team. Any external referrals will be made and managed by the Safeguarding Team. Please read **Appendix 4** for an illustration of the procedures that the Club will adhere to in the event of a professional concern being received.

The club will appoint a case manager to take the matter forward and to be the central point of contact for external agencies – in most cases, this will be a member of the Safeguarding Team. The two aspects to consider when managing the allegation will be:

- **Looking after the welfare of the child** - the EDI, Safeguarding & Wellbeing Director (or their deputy) is responsible for ensuring the child is not at risk and referring cases of suspected abuse to the local authority as described in part four of KCSIE.
- **Investigating and supporting the person subject to the allegation** - the case manager should discuss with the LADO, the nature, content, and context of the allegation, and agree a course of action.

Concerns and or allegations that do not meet the harm threshold.

Any concerns (including allegations) which do not meet the harm threshold, referred to in this policy as 'low-level' concerns.

Low-level concerns

The club encourages and promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the club (including all staff, volunteers, and contractors) are dealt with promptly and appropriately.

The club will ensure that all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately. If implemented correctly, this will:

- encourage an open and transparent culture.
- enable the club to identify inappropriate, problematic, or concerning behaviour early.
- minimise the risk of abuse, and
- ensure adults working in or on behalf of the club are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the club.

The term 'low-level' concern does not mean it is insignificant. A low-level concern is any concern – no matter how small, and even if causing no more than a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the club may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

All low-level concerns will be recorded in writing. The record will include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns will also be noted, if the individual wishes to remain anonymous, this will be respected unless there is a legal requirement to disclose.

The club will ensure all low-level concerns are initially shared with the EDI, Safeguarding & Wellbeing Director for assessment and management. The EDI, Safeguarding & Wellbeing Director will work collaboratively with the relevant responsible Director and the People Director to address and resolve the concern.

All records regarding any professional concern irrespective of seriousness will be kept confidential, held securely, and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

Further information on how to apply this part of the policy will be contained within the guidance document 'Managing Professional Concerns' and the staff code of conduct policy.

Positions of Trust

"Positions of Trust" refers to roles in which individuals hold responsibility, authority, or power over vulnerable persons, such as children, young people, or adults at risk. These positions often involve close contact and influence over the welfare, safety, and development of these individuals, making it essential that those in such roles adhere to the highest standards of conduct and integrity.

In the context of this safeguarding policy, positions of trust include, but are not limited to:

- Coaches and Trainers: Individuals responsible for the physical and mental development of players, including technical skills, fitness, and team building.
- Team Managers and Player Care staff: Those overseeing the general management of teams, player welfare, and club logistics.
- Physiotherapists and Medical Staff: Professionals tasked with players' physical care and treatment, often working closely with players during injury recovery.
- Academy Staff: Employees or volunteers working in youth academies, interacting closely with minors for talent development.
- Volunteers and Support Staff: Individuals who help with events, logistics, and other aspects of the football club's operations, often in contact with young players and vulnerable individuals.
- Host Families: Individuals with whom certain Academy players live, temporarily, for the purpose of residing in closer proximity to the club's facilities.
- Safeguarding Officers: Individuals responsible for ensuring the club's safeguarding policies are implemented and adhered to.
- All staff working to deliver the range of Trust programmes.
- Board Members and Senior Officials: Individuals in leadership positions with the authority to make decisions about club/trust operations, culture, and safeguarding priorities.

Anyone in a position of trust must be aware of their role in protecting those under their care, maintaining professional boundaries, and avoiding any abuse of power or influence.

Therefore, the staff to whom a 'position of trust' applies will have clear expectations set to them (for example within Job Descriptions) regarding conduct, mandatory training, and procedures for reporting concerns to ensure the safety of all participants in the club.

Photography

At times, the Club may wish to take photographs or videos of our players to celebrate football events. We may ask to take images of players to analyse

performance during training. We follow The FA and Premier League guidelines on the capture and use of images.

We understand that in some instances the use of photography and video imagery can present difficulties or risk for varying reasons. Therefore, Brentford will ask for consent to take and use images or video of participants. Where specific arrangements need to be made regarding images of children and young people, decisions are made in consultation with a child's parent or carer. In the case of photography and video imagery taken at matches, consent is included in the terms and conditions of entry.

Accommodation

Some of the players in Brentford live with host families. Host families usually reside close to the training ground and this arrangement is managed by Brentford and in line with the Premier League's Care and Accommodation Guidance.

Host families are usually arranged when a player's family lives far away from the training ground. Living nearby makes the player's life easier and helps them to achieve their full potential in training. We understand that getting this arrangement right is very important for young players and their parents/carers. To achieve this, we make sure that every host family has been carefully selected and checked and the setting provides a friendly, safe, and welcoming environment.

This is achieved by:

- Having a detailed application form to ensure potential host families have the qualities that make them a good fit with young people. We ask for details about their family, home, and motivations.
- Visiting the family at their home. We check that the house is comfortable for a young person. We assess bedrooms, and outside space and complete a Health and Safety assessment.
- Interviewing the family. We follow statutory guidance to ensure best practice when assessing host families. We will ensure the assessment is rigorous and in line with best practice.
- With consent, we complete detailed criminal record checks of all family members (Disclosure Barring Service). We undertake checks with the Local Authority.
- Listening to children and young people within host families to make sure decisions take their perspective into account and that they are happy within this setting.
- Regular engagement with hosted players will take place and be recorded and reviewed.

Every young person living with a host family is visited regularly by the Host Family Coordinator (under the supervision of the Head of Academy Safeguarding and

Welfare). These visits are conducted to ensure the placement is the right fit for the young player. All visits will be recorded and retained on a secure MIS. Any concerns regarding the welfare of the child/adult at risk will be recorded onto MyConcern and the / Head of Academy Safeguarding will be informed.

Communication between the Academy, young players and their parents is regular through a channel that is preferable to everyone e.g., meetings, phone calls, email, or text. Host families are reviewed annually.

Any issues regarding arrangements or welfare are acted on swiftly and in collaboration with all parties to ensure the best outcome for the young person.

Alternative Provisions

An Alternative provision (AP) is education for pupils who cannot attend mainstream school due to factors including exclusion, illness, or other difficulties, and is arranged by either the local authority or the pupil's registered school. BFCCST began providing an AP in September 2025 in collaboration with the Local Authority and local schools. It is important that BFCCST's AP is safe, appropriate for pupil's needs, and welcoming.

This is achieved by:

Full risk assessments are completed prior to each pupil attending the AP.
Written confirmation is provided to the pupil's school that appropriate safeguarding checks have been completed including any analysis of risk.
Schools are required to complete regular reviews of the AP which the Trust fully cooperates with.
All staff working with the pupils have a fully enhanced DBS check.
Full regard has been given to the following statutory guidance:

- Alternative Provision DFE statutory guidance
- Education for children with health needs who cannot attend school

Child Protection

Child protection is the specific and statutory response required by those working with children where there is a concern that the child is suffering significant harm or abuse (i.e., referring to children's social care, and police as needed).

Abuse

Abuse describes any action that causes harm to a child or young person. Abuse can occur in any setting and be carried out by adults or young people.

Whether experienced over a long period of time, or an isolated incident, abuse can have a significant impact on children's health and well-being.

The signs of child abuse aren't always obvious. But there can be behaviours that children display that might indicate they are experiencing abuse e.g. anxiety, anger, being withdrawn or aggressive. Sometimes, physical signs of abuse might be noticeable - however it's important to remember that this is not always the case.

Not all children experiencing abuse will display these physical and behavioural signs. Some may experience a combination of behaviours that change over time. Other children may try to hide any physical signs that something is happening to them. You might notice some of the signs but feel unsure about whether abuse is going on. It's not your responsibility to investigate abuse, but it is your responsibility to observe and report concerning behaviours to the Safeguarding Team. You can get advice and support about the next steps to take to keep the child safe from the Safeguarding Team.

Reporting Concerns

If a concern is raised about a child or young person, due to something that has been observed about their behaviour or appearance, or because of something they or another person has disclosed, this must be reported to a member of the Safeguarding Team, immediately wherever possible, and – at most – within 24 hours.

- Staff's responsibility is to report to the Safeguarding Team (via a phone call and then by MyConcern, if urgent). This must be done within 24 hours.
- The Safeguarding Team's responsibility is to make decisions about levels of risk and next steps.

Being concerned about a child – for example, where their behaviour is out of character, may not always mean they are being harmed or abused. Sometimes a conversation with the child and/or their parent/carer is warranted to try to understand what is going on. All concerns, **however minor,** must be recorded on MyConcern, this is to ensure a complete and current picture of the child/young person is always maintained.
If concerns persist after talking to children and their parent/carer, you must report immediately to the Safeguarding Team.

If a child or young person discloses being hurt by their parent or carer, please contact the Safeguarding Team immediately, do not contact the parent or carer.

Assessing Risk

At times, more information is needed to understand and assess the nature and seriousness of concerns.

A member of the Safeguarding Team may do this by undertaking the activities such as (but not limited to):

- Asking the child/young person open questions

- Speaking to parents about concerns
- Speaking to other staff / professionals
- Reviewing communications
- Viewing documents / CCTV, etc.

Once sufficient information is obtained, the EDI, Safeguarding & Wellbeing Director, and their deputies, will determine whether a referral is needed. If unclear, the EDI, Safeguarding & Wellbeing Director will consult the local authority MASH Team for their view and agree next steps.

Prevent Duty

Prevent is one of the four elements of "CONTEST", the government's counter-terrorism strategy. The four elements are:

- Pursue
- Protect
- Prepare
- Prevent

PREVENT aims to stop people becoming involved in violent extremism. The Prevent Strategy responds to the ideological challenge of terrorism and aspects of extremism, and the threat from those who promote these views. The Prevent Duty incorporates the responsibility to promote fundamental British Values:

The PREVENT Duty covers all forms of radicalisation, including risk from extremist faith groups, far right extremism and some aspects of non-violent extremism.

Prevent Risk Assessment and Action Plan

The Club will undertake a risk assessment of where and how individuals might be at risk of being drawn into terrorism. The level of risk will vary between activities, geographical location, and profile of participants.

All staff in regulated activity will complete a biannual "Raising Awareness About Prevent" training. Staff must also complete the online PREVENT training as part of their Club induction.

Reporting Extremist Narratives or Radicalisation Concerns

All staff have a duty of care to report and escalate concerns using the Club's safeguarding reporting process.
For more information, see:
https://www.gov.uk/government/publications/channel-guidance

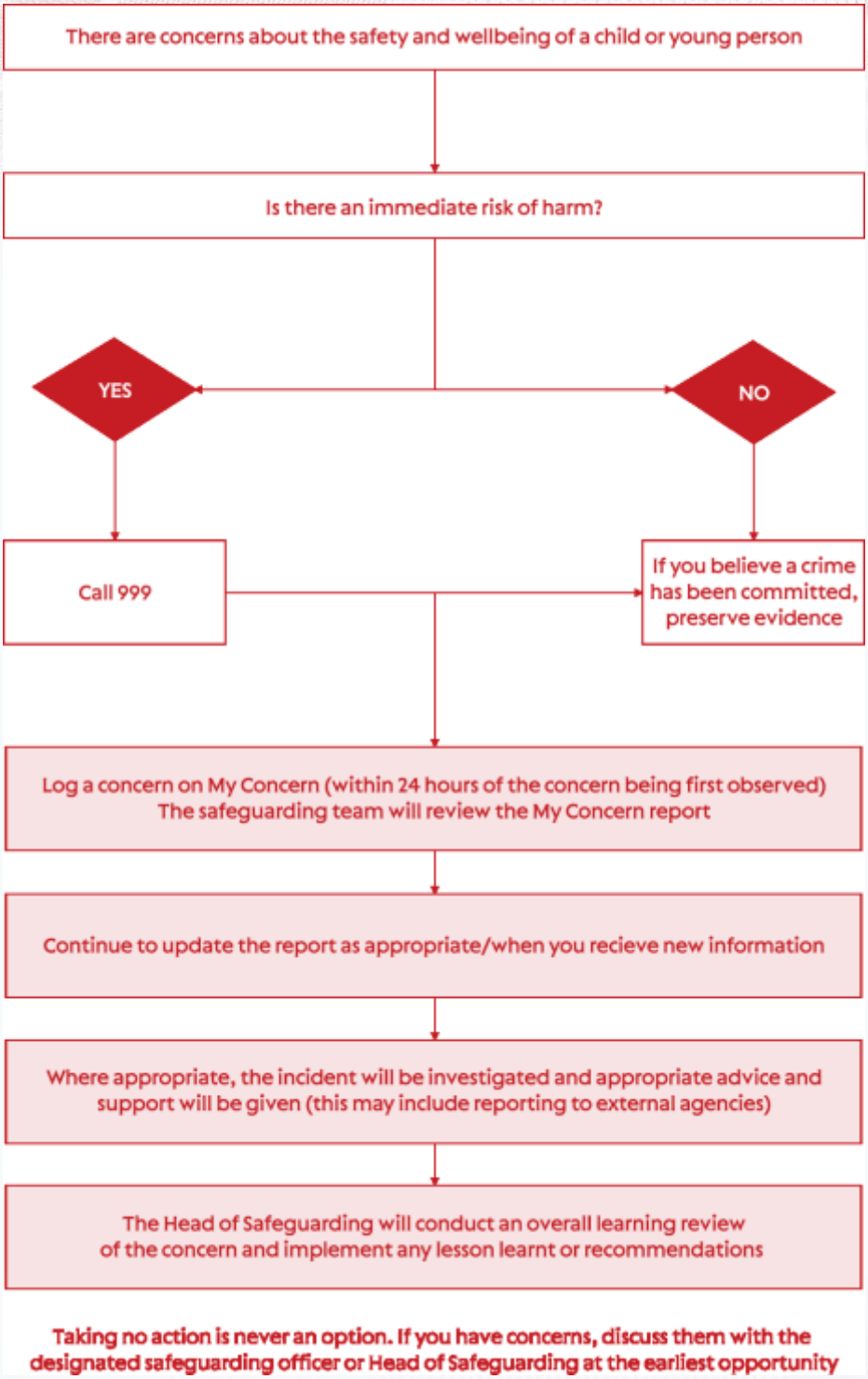
Filtering and Monitoring

The Club recognises its duties under the Premier League rules, the Prevent duty, and wider safeguarding responsibilities to protect children and adults at risk from harm in online environments. As such, we are committed to promoting a safe online environment for our players and participants. The Club has created a dedicated policy designed to protect players from online abuse, cyberbullying, harmful content, and inappropriate behaviours, while encouraging responsible use of technology. The club also recognises the risk of disinformation, misinformation and conspiracy theories as potential harm in online environments. This policy applies to all Academy players, Trust participants, staff, and visitors within the Academy and Trust who use Club-issued technology (e.g., iPads, laptops), personal devices (e.g., mobile phones), and any platforms or software used for communication, learning, and Club operations (e.g., Teamworks, WhatsApp). It also includes the use of the Club's corporate Wi-Fi networks and extends to the online activities of all stakeholders while they are on Club premises. The club has also created an AI policy and a Filtering & Monitoring policy to address how filtering and monitoring requirements apply to the use of generative AI ensure the use generative AI safely. Filtering & Monitoring systems are reviewed at least annually.

Raising a Safeguarding Concern

No one should ever assume that someone else will help a child or young person, if a person has a worry, they should report it. It is not the responsibility of anyone at the Club to decide whether abuse has taken place, however it is everyone's responsibility to report concerns for safeguarding staff and the local authority to investigate further. We ask everyone to remember that safeguarding is therefore everyone's responsibility. Staff will be fully supported and protected if they make any report in good faith about a concern. If you do have a concern, you should follow the following procedure.

Reporting Flowchart



Taking no action is never an option. If you have concerns, discuss them with the designated safeguarding officer or Head of Safeguarding at the earliest opportunity

SAFEGUARDING LEGISLATION AND GUIDANCE

This Policy is in line with child protection and safeguarding legislation, including:
The Children's Act 1989
Children Act 2004
Safeguarding Vulnerable Groups Act 2006
Human Rights Act 1998
Domestic Violence Act 2018
Sexual Offences Act 2003
The UK Data Protection Act and UK General Data Protection Regulation 2018
Equality Act 2010

Statutory guidance:
Working Together to Safeguard Children 2026
Keeping Children Safe in Education 2026

Local guidance:
London Child Protection Procedures (updated 30th March 2026)

Football guidance:

- The Football Association Safeguarding Policy and Procedures
- The Premier League Safeguarding Policy and Procedures 2026/2027
- Premier League Guidance for Safer Working Practice

RELATED CLUB POLICIES:

This policy should be read alongside the following:

- Managing Allegations against Staff Policy
- Recruitment and Selection Policy
- Code of Conduct
- Modern Slavery Act Statement

Policy Review

This Policy is subject to regular review to ensure that it is fit for purpose. These reviews take place after all safeguarding concerns and incidents and in line with changes of legislative documents and guidance updates.

Internal Contact Details

safeguarding@brentfordfc.com

Business Operations Director
Adam Brown

EDI, Safeguarding & Wellbeing Director
Kaammini Chanrai

Head of Academy Safeguarding
Sam Bayford

Academy Safeguarding Officer
Lee Silk

Host Family Coordinator
Rachel Ababrese

Safeguarding Partner
Anna Wooldridge

Head of Safeguarding (BFCCST)
Gina Coleman

Safeguarding Manager (BFCCST)
Scott Southgate

Trust: Safeguarding Lead Trustee
Marcella Phelan

General Counsel and Senior Safeguarding Lead (BFC Board)
Nity Raj

External Safeguarding Contacts:

Premier League Head of Safeguarding
Jessica Addicott - jaddicott@premierleague.com

Premier League Foundation Head of Safeguarding
Kate Singleton – ksingleton@premierleague.com

LADO – London Borough of Hounslow
Email - lado@hounslow.gov.uk
Grace Murphy - grace.murphy@hounslow.gov.uk
Sarah Paltenghi – sarah.paltenghi@hounslow.gov.uk

LADO – London Borough of Ealing
Natalie Cernuda – asv@ealing.gov.uk

London Borough of Hounslow Children's and Adults' Services
https://www.hounslow.gov.uk/info/20059/children_and_families
https://www.hounslow.gov.uk/info/20048/adult_social_care
Children: 020 8583 6600 (daytime and out-of-hours)
Adults: 020 8583 3100 (Mon-Fri, 9am to 5pm) & 020 8583 2222 (out-of-hours)

London Borough of Ealing Children's and Adults' Services
https://www.ealing.gov.uk/info/201023/children_and_families_social_care
https://www.ealing.gov.uk/info/201073/health_and_adult_social_care
Children: 020 8825 8000 (daytime and out-of-hours)
Adults: 020 8825 8000 (daytime and out-of-hours)

NSPCC
0808 800 5000 (24-hour helpline) | help@nspcc.org.uk | www.nspcc.org.uk

Child Line
0800 1111 | www.childline.org.uk

Child Protection in Sport Unit
0116 234 7278 | cpsu@nspcc.org.uk | www.thecpsu.org.uk

CEOP Centre – Child Exploitation and Online Protection
www.thinkuknow.co.uk | www.ceop.police.uk

Ann Craft Trust
https://www.anncrafttrust.org/

APPENDIX 1. DEFINITIONS OF ABUSE

Abuse is any form of maltreatment.

- Somebody may abuse or neglect someone by inflicting harm or by failing to act to prevent harm.
- Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.
- People may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse.
- Children may be abused by an adult or adults or by another child or children – indeed a third of all child abuse is perpetrated by others under 18.

Physical abuse:

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

Emotional abuse:

- The persistent emotional maltreatment of an individual such as to cause severe and adverse effects on the child's emotional development.
- It may involve conveying to someone that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
- It may include not giving someone 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 from participating in normal social interaction.
- It may involve seeing or hearing the ill-treatment of another, such as witnessing domestic abuse and coercive control or the abuse of a sibling.
- It may involve serious bullying (including cyberbullying), causing someone 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 an individual, although it may occur alone.

Sexual abuse:

- Involves forcing or enticing an individual to take part in sexual activities, not necessarily involving violence, whether or not they are 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. Sexual abuse is not solely perpetrated by adult males.
- Women can also commit acts of sexual abuse, as can other children.
- The sexual abuse of children by other children is a specific safeguarding issue in all forms of training / education and all staff should be aware of it.

Neglect:

- The persistent failure to meet an individual's basic physical and/or psychological needs, likely to result in the serious impairment of their health or development.
- Neglect may occur during pregnancy, for example, as a result of maternal substance abuse.
- 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).
    - or ensure access to appropriate medical care or treatment.
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Financial abuse:

- Financial abuse is a type of abuse which includes having money or other property stolen, being defrauded, being put under pressure in relation to money or other property and having money or other property misused.
- It may also include:
    - Borrowing money and not giving it back
    - Stealing money or belongings
    - Taking pension payments or other benefits away from someone.
    - Taking money as payment for coming to visit or spending time together.
    - Forcing someone to sell their home or assets without consent.
    - Tricking someone into bad investments

- Forcing someone to make changes in wills, property or inheritance.

APPENDIX 2. SAFEGUARDING ISSUES

Recognising abuse, bullying and other harms

- The Club is committed to making it as difficult as possible for anyone to be abused, exploited or mistreated while engaged in football-related activities.
- All staff and volunteers have a responsibility to play a part in preventing and reporting abuse or any incident or behaviour that compromises the safety and/or welfare of children, young people and adults at risk.
- Everyone has a role to play in reporting abuse or any incident or behaviour that causes concern or puts someone at risk of harm.
- Staff are not expected to be an expert in recognising abuse; however, all staff should be vigilant and ensure that they always respond swiftly and appropriately to safeguarding allegations, concerns and incidents in line with the Club's policies, procedures and training.

This section describes forms of abuse, inappropriate behaviour and other safeguarding concerns that must be reported to the Safeguarding Team who will take such steps as are considered necessary to ensure the safety and welfare of individuals.

All staff should be aware that your Club's policies and procedures may define additional safeguarding issues and behaviour that must also be recorded and reported.

Knowledge, understanding and being able to recognise abuse and poor practice contributes to a safer culture and environment.
In addition to physical abuse, emotional abuse, sexual abuse and neglect, there are a range of safeguarding concerns that staff must be able to recognize.

Child-on-child abuse

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both onsite and offsite. All staff have an important role to play in preventing it and responding where they believe a child may be at risk from it. It is important to remember that this child-on-child abuse is a safeguarding issue for children involved, including alleged perpetrators.

All staff should understand that even if there are no reports within the Club, it does not mean it is not happening, it may be the case that it is just not being reported. It is important if staff have any concerns regarding child-on-child abuse they should speak to the Safeguarding Team.

It is essential that all staff understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are abusive in nature.

Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- 'upskirting', which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).
- misogyny, which is the dislike of, prejudice against, or discrimination towards women and girls, and can be expressed through behaviours such as sexist comments, harassment, intimidation, or harmful attitudes.

Sexual image sharing

Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal, whilst non-consensual is illegal and abusive and all incidents involving the sharing of nude or semi-nude images still require a safeguarding response. UK Council for Internet Safety provides detailed advice about the sharing of nude and semi-nude images and videos. It is important to take a proportionate approach that considers the age, development and circumstances of the children involved, as well as any elements of coercion, exploitation or vulnerability.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.

CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This type of harm can be committed or facilitated by an organised network or gang and children may identify as part of one of these groups. Children are not always recognised as victims and can be criminalised for actions they take while under coercion.

Criminal Exploitation

All staff should be aware of the indicators, which may signal children/adults at risk are at risk from, or are involved with, serious violent crime.

These may include:

- increased absence from school or college,
- a change in friendships or
- relationships with older individuals or groups,
- a significant decline in performance,
- signs of self-harm or a significant change in wellbeing, or
- signs of assault or unexplained injuries.

Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

County lines

The organised criminal distribution of drugs by gangs from the big cities into smaller towns and rural areas using Children and Adults at Risk.

Gangs recruit Children and Adults at Risk through deception, intimidation, violence, debt bondage and/or grooming.

Gangs also use local property as a base for their activities, and this often involves taking over the home of an Adult at Risk who is unable to challenge them (cuckooing).
County line gangs pose a significant threat to Children and Adults at Risk upon whom they rely to conduct and/or facilitate such criminality.

Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial, or emotional. Children can be victims

of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Mental Health

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children/adults at risk day-to-day and identify those whose behaviour suggests they may be experiencing a mental health problem or be at risk of developing one. The club can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies.

If staff have a mental health concern about a child/adult at risk that is also a safeguarding concern, immediate action should be taken, engaging with the Safeguarding Team, and completing a MyConcern report.

Staff also have a responsibility to promote good mental wellbeing and therefore help prevent the onset of mental illness.

Harmful sexual behaviour

Developmentally inappropriate sexual behaviour displayed by children which is harmful or abusive.

Harmful sexual behaviour involves one or more children engaging in sexual discussions or acts that are inappropriate for their age or stage of development.

These can range from using sexually explicit words and phrases to full penetrative sex with other children or adults. It may also be referred to as sexually harmful behaviour or sexualised behaviour. It can be displayed towards younger children, peers, older children, or adults, and is harmful to the children who display it, as well as the people it is directed towards.

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.

Modern Slavery

Modern slavery is a hidden crime that affects every country. Modern slavery covers a set of specific legal concepts including forced labour, debt bondage, forced marriage, slavery and slavery-like practices, and human trafficking. Although modern slavery is not defined in law, it is used as an umbrella term that

focuses attention on commonalities across these legal concepts. Essentially, it refers to situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception, and/or abuse of power.

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 or 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 practice FGM in the UK or to take girls who are British nationals or permanent residents of the UK abroad for FGM whether or not it is lawful in another country.

Gambling

Gambling is when you risk money (or something of value) in a game or a bet in the hope of winning money or a prize. There are lots of different types of gambling and it may not be clear that some activities are gambling. The Gambling Act 2005 sets out how gambling is regulated in the UK, it covers arcades, betting, bingo, casinos, gaming machines, society lotteries, and online gambling.

For most gambling activities, the legal age is 18. However, there are some which do not have age restrictions, like playing a toy grabber game in the hope of catching a prize or making a bet with a friend.

Gaming

Gaming refers to playing electronic games, whether through consoles, computers, mobile phones or another medium altogether. Gaming is a nuanced term that suggests regular gameplay, possibly as a hobby. Although traditionally a solitary form of relaxation, online multiplayer video games have made gaming a popular group activity as well.

Forced Marriage

A forced marriage is where one of both people do not or cannot consent to the marriages and pressure or abuse is used to force them into the marriage. It is also when anything is done to make someone marry before they turn 18, even if there is no pressure or abuse. Forced marriage is illegal in the UK. It is a form of domestic abuse and a serious abuse of human rights.

The pressure put on people to marry against their will may be:

- physical: for example, threats, physical violence, or sexual violence.
- emotional and psychological: for example, making someone feel like they are bringing 'shame' on their family.
- financial abuse: for example, taking someone's wages, may also be a factor.

Attendance Concerns (e.g., absences) and Early Help

Similar to school environments, absences from training, matches or other scheduled activity might indicate underlying issues such as bullying, mental health concerns, or exploitation. Staff should be alert to absences – particularly any emerging patterns – and report any concerns to the safeguarding team.

Staff in relevant positions should adopt:

1. Clear attendance monitoring protocols.
2. Routinely discuss the wellbeing of participants.
3. Engage with parents / guardians when children are frequently absent.
4. Ensure that participants are aware of any pastoral support mechanisms.

The Club or Trust's safeguarding team will assist staff and ensure that any early help pathways are understood and engaged. This may include working with external agencies (such as local safeguarding partnerships and/or mental health services)

Young Carers

A young carer is a child or young person who regularly helps care for a family member who has a disability, illness, mental health condition, or substance misuse issue. Staff should be alert to the needs of young carers and recognise that caring responsibilities can impact attendance, attainment, behaviour and wellbeing. Early identification is key to making sure young carers receive support at the right time from the right services.

Changing rooms and toilets

On all sites there will be both male and female changing rooms and toilets for children and young people to use, and children aged 11 years and older will be separated when using these facilities from the other gender. There will also be accessible and gender neutral facilities available for those that need it.

APPENDIX 3. NOTIFYING THE FOOTBALL ASSOCIATION AND THE PREMIER LEAGUE OF ALLEGATIONS

The Club/Trust will notify the relevant Football authorities (the Premier League and the FA) and give such further information as they may require in respect of:

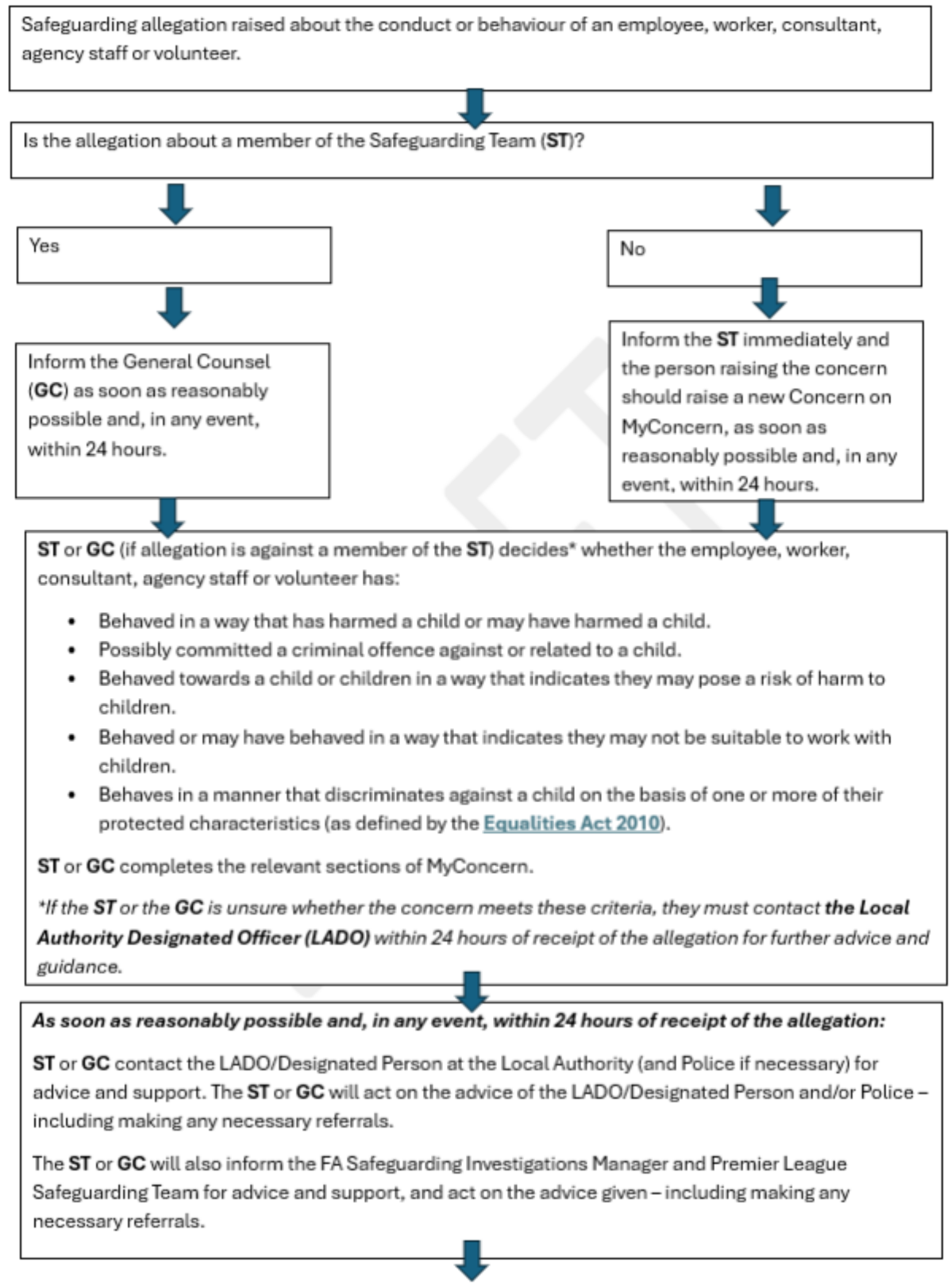
- any allegations involving members of staff (whether current, prospective or former) in respect of children or vulnerable adults.
- an incident or allegation of 'poor practice' (where it is the third or a subsequent occasion of poor practice, whether or not the relevant incident or allegation is similar in nature to previous incidents or allegations of poor practice) – that is, behaviours which contravene existing codes of conduct, infringe an individual's rights and/or reflect a failure to fulfil high standards of care. It includes things like insufficient care being taken to avoid injuries, allowing abusive or concerning practices to go unreported, allowing embarrassing/harassing practices to go unreported, placing individuals in uncomfortable situations, for example, inappropriate use of social media/messaging with young players etc.
- any actions agreed to be taken in respect of the individual; and
- any allegation of abuse of a child or adult at risk committed by a player or a participant in any activity organised by the Club or Trust.

All such matters must be referred to the Premier League and the Football Association as soon as reasonably practicable.

Where a referral is made to an 'external agency' (such as the police, the LADO or the DBS), this must be referred to the football authorities within 24 hours, along with all relevant information and evidence provided to the external agency in respect of the same.

Failure to report a concern may result in action taken by The FA under its Disciplinary Regulations and/or the Premier League under Rule W.

APPENDIX 4. MANAGING ALLEGATIONS AGAINST STAFF OR VOLUNTEERS - PROCEDURES



The **ST** or **GC** will decide whether to suspend the employee, worker, consultant, agency staff or volunteer pending the statutory investigations and inform the LADO/Designated Person and/or Police of the Club's decision.

Once any statutory investigations are concluded / where appropriate in parallel the Club will undertake its own investigation and decide what sanction(s) should be taken against the employee, worker, consultant, agency staff or volunteer.

If the employee, worker, consultant, agency worker or volunteer is removed from their role in working with children or young people, a referral will be made by the **ST** or **GC** to the Disclosure and Barring Service (DBS).

Any learning and recommendations from the case will be implemented.