



Safeguarding Children and Young People Policy and Procedure

Brighton & Hove Albion FC // Brighton & Hove Albion Women's FC // BHAFC Foundation

January 2023



FOUNDATION

Introduction to the policy

Brighton & Hove Albion Football Club (BHAFC/'the club') is committed to safeguarding and ensuring the protection of children and young people. The club fully accepts its responsibility for children and young people and our aim is to ensure that safeguarding runs through every element of the club's work to ensure the welfare and well-being of all children and young people who engage in activities with the club.

Where the policy refers to 'the club' this also includes Brighton & Hove Albion Women's Football Club (BHAWFC) and Brighton & Hove Albion Foundation (BHAFC Foundation).

All children and young people have a right to be protected from abuse regardless of the presence of any protected characteristics listed by the Equality Act 2010. Age, disability, gender assignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

We believe that all adults working within the club, in any capacity, have a duty and responsibility to safeguard the welfare of children and young people. We strive to do this by applying policy, procedures and best practice to promote the safety and welfare of children and young people who engage in activities with the club. This allows them to enjoy any club activity in a safe, inclusive and child-centred environment.

We believe that everyone who comes into contact with children and families has a role to play in ensuring a child's welfare. Adults who work with children and young people are placed in a position of trust that carries authority, status, power and, most importantly, responsibility. We strive to ensure that all adults involved with children be positive role models who display high moral and ethical standards.

The safeguarding of children and young people is extremely important to all at the club. We recognise that parents and carers often place trust in us to take care of their children; whether at a Young Seagulls activity, an BHAFC Foundation event or session, an academy tour or attending a game at the stadium. As such, we embrace the legal and moral responsibilities we hold for the safety and welfare of children.

The club's Children and Young People Safeguarding Policy and Procedures meet the requirements of:

- The Children Act 1989 & 2004.
- Working Together to Safeguard Children 2018.
- Working Together to Safeguard Football 2014.
- The FA Premier League Safeguarding Standards.
- The FA Charter Standard Safeguarding Policy and Procedures.
- Keeping Children Safe in Education 2022.

This policy is supported by all senior managers and has been approved by the BHAFC Board of Directors, the BHAWFC Board of Directors and the BHAFC Foundation Board of Trustees.

See also Appendix 4 for details of legislation which underpins this policy and these procedures.

Scope

This policy applies to all those working with children and young people for or on behalf of the club, including permanent, casual, volunteers and contractors regardless of their role.

All the requirements are mandatory and are to be enforced as indicated by the appropriate persons in all cases where there are any suspected instances of poor practice or abuse.

All those working with children and young people for or on behalf of the club must make themselves aware of the club's Safeguarding Policy & Procedures and, where appropriate, their work with children and young people will be supported by safeguarding training to ensure staff are able to understand and discharge their Safeguarding responsibilities.

Activities undertaken by club departments at the following locations fall under the remit of this policy (this list is not exhaustive):

The American Express Community Stadium:

- Men's first team and Academy fixtures.
- Women's first team and reserve team training.
- Stewarding and all other matchday activities.
- Stadium tours, children's birthday parties.
- Stadium Superstore.
- Junior fans activities.
- BHAFC Foundation programmes and activities.

The American Express Elite Football Performance Centre and other venues:

- Men's first team training, Academy matches, training and development centres.
- Women's and Girls Regional Talent Centre and development squad training.
- Educational provision.
- All medical provision for children and young people under 18 years.
- Academy Host Family provision.
- BHAFC Foundation programmes and activities.

The People's Pension Stadium, Crawley:

- Women's First Team, Academy fixtures and Under-21 ~~DS~~ fixtures.
- BHAFC Under-21 fixtures.

Definitions

Under the Children Act 1989, a **child or young person** is defined as anyone up to their 18th birthday (Children Act 1989).

Under the guidance in Working Together to Safeguard Children 2018, **safeguarding and promoting the welfare of children** is defined as:

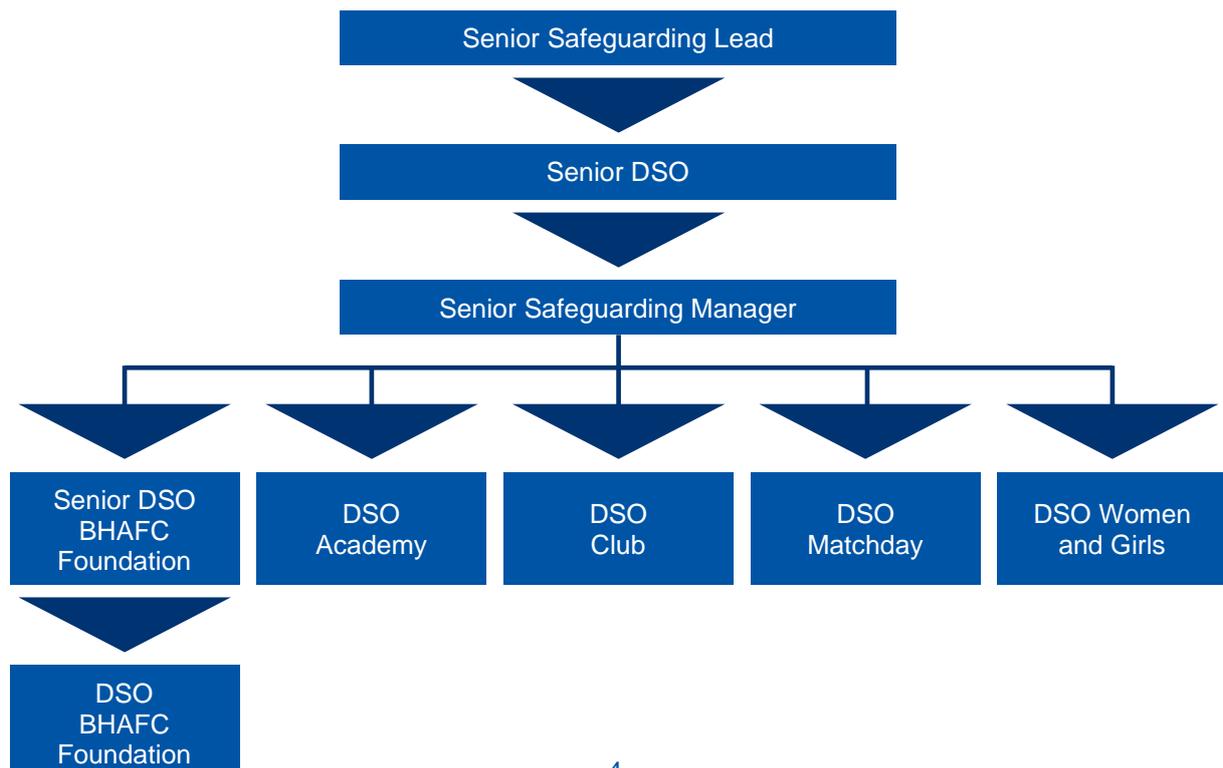
- Protecting children from maltreatment.
- Preventing impairment of children’s health and development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable children to have the best outcomes.

Safeguarding Framework

The club’s comprehensive framework for ensuring the protection of children and young people includes:

Roles and Responsibilities

It should be noted that all employees of the club have a responsibility for the welfare of children and young people who engage in any club activity; however, there are also more specific roles who have specified duties in relation to safeguarding.



Safeguarding roles

Designated Safeguarding Officers (DSO)

Senior Safeguarding Lead

There is one Senior Safeguarding Lead at the club. Deputy Chairman and Chief Executive Officer, Paul Barber, is the Senior Safeguarding Lead for BHAFC. The Senior Safeguarding Lead represents Safeguarding at the BHAFC board.

Senior Designated Safeguarding Officer

Rose Read is the Senior Designated Safeguarding Officer, Head of People & Culture and board member for BHAFC Foundation and BHAWFC. Rose's role is to assist and support the Designated Safeguarding Officers in every department and to deputise for the Senior Safeguarding Lead in his absence.

Matt Dorn, BHAFC Foundation Chief Executive Officer, is the BHAFC Foundation Senior Designated Safeguarding Officer. Matt's role is to assist and support the BHAFC Foundation DSO and champion Safeguarding within BHAFC Foundation.

Senior Safeguarding Manager

Richard Valder-Davis is the Senior Safeguarding Manager, and it is his role to provide club-wide strategic leadership and management in order to assist with the safeguarding strategy of the club. This role is responsible for ensuring all safeguarding concerns from all areas of the club are recorded correctly, reported to a Senior Safeguarding Leads and referred to the appropriate statutory agency.

Please see Appendix 2 for a detailed description of the roles and responsibilities of the role.

Designated Safeguarding Officers (DSO)

There is a DSO within each business area of the club. Their role is to provide support and refer all issues upwards to the Safeguarding Manager and the Senior Designated Safeguarding Officer. The relevant DSO will most often be your first point of contact for any safeguarding concerns or disclosures that arise. Where appropriate, the DSO will make the necessary referrals to the relevant statutory agencies, the FA Case Management Unit and the Premier League Safeguarding Team.

Appendix 2 provides a more detailed breakdown of the duties and responsibilities of the role.

- The senior DSO for BHAFC is Rose Read
- The DSO for the Academy incorporating the Boys and Girls academies is Richard Valder-Davis
- The DSO for BHAFC Foundation Holly Baker
- The Senior DSO for BHAFC Foundation is Matt Dorn
- The DSO for matchdays is Adrian Morris

The BHAFC Foundation Board of Trustees

The BHAFC Foundation Board of Trustees is ultimately responsible for leadership and oversight of safeguarding at BHAFC Foundation.

Safeguarding Trustee

BHAFC Foundation has a dedicated Safeguarding Trustee. This role is to provide BHAFC Foundation Safeguarding oversight and accountability on the board of trustees. The Safeguarding trustee will receive Safeguarding updates from the Safeguarding Coordinator and the BHAFC Foundation DSO. Any employee occupying the above roles will have been issued with a detailed role description that sets out the responsibilities of the role

Safeguarding Board member

BHAWFC has a dedicated Safeguarding board member who is responsible for oversight of safeguarding within the Women's & Girls area of the club.

Please see Appendix 3 for the contract details for all relevant safeguarding persons within the club and for some external contacts that may be of help if you have a safeguarding concern.

Safe recruitment and safeguarding training

The club recognises the importance of safe recruitment and has taken into account the government guidance in Keeping Children Safe in Education 2022 and the FA's Responsible Recruitment guidelines to ensure there is a safe and responsible recruitment process for all individuals within the club who come into contact with children and young people. This applies whether in a paid or voluntary capacity.

The club has a duty to carry out due diligence that any third parties working with children or vulnerable adults on behalf of the club or charity, including but not limited to teachers, interpreters and mental health professionals will also have completed a safer recruitment process.

The club's safe recruitment process includes:

- Ensuring job descriptions and job advertisements highlight the key responsibilities of the role and the club's commitment to safeguarding.
- Applications must be made in writing by the candidate and not an agent; the club will then shortlist and interview as appropriate for the role. Each candidate will be interviewed by two members of staff prior to any offer and interviews will include exploration of candidates' attitudes and approaches towards safeguarding.
- Ensuring all applicants identity, qualifications and experience are verified through original documentation and any gaps in CVs will be properly explored.
- All roles or positions will require satisfactory references and criminal record checks under the Disclosure & Barring Service (DBS) appropriate to the role concerned. and in line with The Rehabilitation of Offenders Act 1974; Guidance for roles should be assessed in line with government guidance **DBS checks in sport for staff working with Adults** and **DBS checks in sport for staff working with Children**.
- The club will abide by the FA's guidance on roles which fall within a Regulated Activity and therefore need an Enhanced DBS. It will also follow Affiliated Football guidance on roles that, although outside the regulated activity definition, still warrant Enhanced or Standard DBS checks and roles where a basic check will satisfactorily serve the club's safeguarding policy.
- Those working with children or adults at risk will need two written references including an express request of details of any safeguarding matters recording by previous employers to ensure the

fulfilment of the club's commitment to safeguarding.

- A person may commence work prior to the background checks and references being returned but such person will be supervised at all times whilst working with children/adults at risk until such time that all background checks and references are completed and deemed to be acceptable by the club.
- Ensuring all staff complete a probationary period.

The club also requires all agency staff and consultants working with children to sign a self-declaration form. This requires employees to declare any criminal history they may have.

Consultants and agency staff who undertake a regulated activity with children must have a valid Enhanced DBS. This will need to be verified through the DBS number and date of issue.

If a person's criminal record check reveals cautions, convictions, community resolutions, warnings or final reprimands, the club will consider the nature of the offence/offences in deciding if the person is unsuitable for working with children and young people.

The 'standard' and 'enhanced' criminal record check will show an employer past crimes, even if they're spent. Guidance on what classifies a 'Spent conviction' can be found at www.gov.uk/exoffenders-and-employment.

The Club will conduct a risk assessment to evaluate the information and the person may be required to attend a risk assessment meeting with the relevant Designated Safeguarding Officer (DSO) prior to any recruitment decision being made.

If a person is not suitable for a job because of a spent conviction or caution, the club may withdraw a job offer.

On occasions a participant may themselves pose a risk through their criminal past and a risk assessment in relation to the participant may be required. The Child Protection in Sport Unit (NSPCC) has produced guidance in this area.

Section below outlines: What to do if a criminal record comes to light: [**Making safe and fair decisions about membership for people with criminal records.**](#)

Re-certification

It is an expectation of all club staff who work with children to keep their certificates up to date. All certificates including DBS, FA Safeguarding and First Aid expire after three years.

Participants with criminal records

Child Protection in Sport Unit (NSPCC) has produced guidance in this area which should be referred to if needed: **Making safe and fair decisions about membership for people with criminal records.**

1. Being a participant or fan is not exempt from The Rehabilitation of Offenders Act, meaning it is unlawful to refuse or withdraw membership or to prejudice a participant or fan in any way when a caution or conviction has been spent.
2. Whilst there is no requirement to perform checks on all participants and fans, there are occasions when a criminal background may come to light including, word of mouth, newspaper or online reporting, through the police or statutory agency or self-disclosure.

3. Following information coming to light, the club will establish whether the conviction is unspent. This can be achieved through a self-declaration form or a face-to-face meeting.
4. The club may also request a Basic disclosure from the individual if confirmation of the conviction is required.
5. Following confirmation of an unspent offence the club may carry out a Safeguarding risk assessment based on the activity being attended. Following the risk assessment, a decision will be made about the terms of participation.
6. In the event that a spent conviction comes to light, Safeguarding should be at the heart of any decision and any breaches of current Code of Conduct or current behaviours falling short of club values should be dealt with through normal disciplinary procedures, taking no account of the spent conviction.

Induction and Training

During the induction process, all staff will have mandatory in-house training on identifying and reporting concerns in respect of safeguarding. This training will also incorporate the Premier League guidance for safer working practice. Employees will also receive copies of this Policy and Procedures, along with other club policies, and must sign that they have read and agreed the contents. A refresher face to face safeguarding course will be provided every three years or earlier if required.

The training will also include an overview of this policy with specific emphasis on:

- The principles and obligation to safeguard within a sporting environment.
- An understanding of the signs and symptoms of abuse (sexual, physical, emotional, neglect, grooming, online, child-on-child and radicalisation).
- Practical advice regarding safeguarding practicalities in your role.
- Dealing with a disclosure.
- How to report a safeguarding concern.
- The impact of holding a position of trust and examples of good and bad practice.
- The safeguarding structure at the club.
- Safeguarding the safeguarder.

Safeguarding updates in line with current local and national safeguarding trends and priorities will be provided as part of the club's ongoing commitment to ensure the protection and welfare of children.

The Safeguarding Manager will attend mandatory Premier League safeguarding training for senior managers at least every two years.

The Designated Safeguarding Officers will attend mandatory safeguarding training annually.

Records of attendance, content, changes and an understanding of all training will be kept and made available to legitimate parties on request. This includes where, due to the nature of a role, a person is required to attend external training course.

Equality, diversity and inclusion

All children and young people have a right to be protected from abuse regardless of the presence of any protected characteristics listed by the Equality Act 2010, age, disability, gender assignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

All internal safeguarding training will embed a culturally sensitive approach to safeguarding practice.

Abuse

Child abuse is defined as the maltreatment of a child. Abuse or neglect can be somebody directly inflicting harm on a child, but it can equally arise by failing to act to prevent the harm of the child. Child abuse can arise in various settings including in the family home, institutional or community settings or via the internet. It can be perpetrated by an adult, or another child, known or unknown to the victim.

The main areas of abuse are physical, emotional, neglect and sexual mistreatment. Other areas of abuse include child sexual exploitation, child on child abuse, female genital mutilation, youth produced sexual imagery and radicalisation. All of which can present themselves in very different manners, so it is imperative to be aware of the signs of abuse. Further detailed information about the definitions and physical and behavioural signs of different types of abuse can be found in Appendix 1.

Additional vulnerabilities

It is important to be aware that children who have additional vulnerabilities may be more susceptible to abuse. Therefore, such children may need further safeguards in place to reduce the potential risk of abuse and neglect. Working Together to Safeguard Children 2018 provide useful guidance on children and young people who may be particularly vulnerable to abuse:

- The child is disabled and has specific additional needs.
- The child is a young carer.
- The child is at risk of being radicalized or exploited. The club has a responsibility to fulfil its duty in line with the government Prevent programme to radicalise and respond to any risk or signs of radicalisation. The club will do this by:
 1. Prevent being included on the club's risk register as a standalone risk.
 2. Have in place a monitoring system which will indicate through 'key word' filters when networks are accessing inappropriate content.
 3. Staff will receive blended training to educate on the signs and indicators or radicalisation.
 4. Any concerns staff or children may have in relation to radicalisation will be reported in line with all other abuse types outlined in this policy.
 5. The further referral of radicalisation concerns will be made appropriately to the relevant authorities and Police forces.
 6. DSO's will maintain relationships with statutory stakeholders for updates relating to Prevent.

- The child is in a family circumstance presenting challenges for the child, such as domestic violence, adult mental health issues or drug/alcohol abuse by the parents.
- The child is a looked after child or has recently returned home after being in care.
- The child frequently goes missing from home.

This is not an exhaustive list.

The best way to ensure that children or young people with additional vulnerabilities are better protected is by fostering an environment whereby the children or young people are helped in protecting themselves and feel able to raise concerns about their safety.

Definitions of good practice and poor working practice

Good practice:

All employees, workers, consultants, agency staff and volunteers working with children or young people should adhere to the following principles when undertaking their work:

- Be a role model, displaying consistently high standards of behaviour and appearance (disciplined/committed/time keeping).
- Always use language that is child appropriate and socially acceptable.
- Always work in an open environment. You should avoid unnecessary private situations and discourage secrets and/or closed communication.
- Make the experience of the sporting activity fun and enjoyable for all involved. In doing this, you should promote fairness and confront and manage any bullying.
- Treat all children and young people equally and with respect and dignity.
- Always put the welfare of the child or young person first.
- Avoid unnecessary physical contact and maintain a safe and appropriate distance with children and young people.
- Where any form of manual/physical support is required, it should be provided in an open environment and with the consent of the child or young person. Physical contact can be appropriate and, sometimes a necessary part of training. However, it must be neither intrusive nor disturbing and the child or young person's consent must be obtained prior to the contact.
- Where supervising groups of children or young people in changing rooms, always ensure staff members work in pairs and appropriate staff to children ratios are in place.
- Written parental consent is required if club officials are required to transport children and young people or for any significant travel arrangements e.g., tours/overnight stays;
- There must always be a qualified first aider present or readily available.
- Whilst at away events, adults should not unnecessarily enter a child or young person's room and they should never invite children or young people into their own room.
- When providing feedback to children and young people, make sure it is constructive and encouraging as opposed to negative criticism.

- Where the club acts in loco parentis, secure written consent from parents and guardians for the administration of emergency medical treatment and first aid.
- Ensure that a written record is kept of any incidents or injuries that occur. This record should include details of the incident, any action taken, and any treatment given.
- Ensure all communication with persons under 18 is conducted with parental consent. Any text messages or social media contact with children or young people must be for the sole purpose of facilitating arrangements and should always be made using the business mobile telephone provided. It is better practice to jointly communicate with the parent or guardian and child

Poor Practice:

The following are regarded as poor practice when working with children and all employees, workers, agency staff, volunteers must avoid such behaviour. These types of behaviours should always be challenged, by not doing so behaviours become normalised and the risk to children increases:

- Taking insufficient care to avoid injuries. For example, by excessive training or inappropriate training for the age, maturity, experience and ability of players.
- Allowing abusive or concerning practices, allegations or disclosures to go unreported or not acted upon. If you have reported the matter to the relevant person within the club and it has not been dealt with correctly, consult the procedures in this document.
- Spending unnecessary amounts of time alone with children and young people away from others.
- Being alone in changing rooms, toilet facilities or showers used by children and young people.
- Taking a child or young person alone in a car unless written consent has been obtained from the Safeguarding Team in an emergency situation.
- Taking children or young people to your home or any location where they will be alone with you;
- Sharing a room with a child or young person if at an overnight stay or tour.
- Engaging in rough, physical or sexually provocative games of any type, even those which you may consider to be simply 'horseplay' or 'banter'. This is never appropriate and should be avoided;
- Encouraging, allowing or engaging in inappropriate touching of any form.
- Placing children in potentially compromising and uncomfortable situations with adults (e.g., inappropriate use by a coach/staff member of social media with a young player).
- Allowing children or young people or staff to use inappropriate language or action without being challenged or corrected, for example hazing or bullying.
- Making sexually suggestive comments to a child or young person.
- Doing things of a personal nature that the child or young person can do for themselves.
- Ignoring health and safety guidelines as this will subject children to unnecessary risks. (e.g., allowing young players to set up goalposts unsupervised by adults).
- Giving continued and unnecessary preferential treatment to individuals.
- Forming unprofessional relationships with parents or carers of participants of the club.

Please note that both lists are not exhaustive but merely providing examples of the types of behaviour you should promote or avoid respectively

Whistleblowing and complaints

The club recognises the risk of things going wrong or unknowingly harbouring poor practice and believes it has a duty to identify such situations and implement measures to mitigate such risks. As such, the club encourages a culture of openness and one of prevention rather than simply cure.

If you feel there is a requirement to whistle blow, you should first consult your line manager. If the matter concerns your line manager, you should contact the next in line senior manager.

The full Whistleblowing Policy is available for staff. If you are unable to raise concerns internally, please consult the NSPCC Whistleblowing Helpline on 0800 028 0285.

The Academy and the BHAFC Foundation have formal complaints procedures which can be accessed via the club's and BHAFC Foundation's websites.

Lost or missing children and young people

Every effort must be made to ensure children and young people remain either with their parents, carers or activity leaders. However, should a child or young person become lost or go missing whilst engaging with a club activity, the club will make every effort to locate the child as quickly as possible.

If the child or young person is not located within a reasonable amount of time the club will contact the child's parents or carers and agree with them to contact the police. If the parents or carers are not available, the club will call the police directly.

A record will be kept by the Safeguarding Team of any instances in which a child or young person goes missing whilst engaging in club activities including any action taken by the club and the eventual outcome.

Searching children and young people

In order to ensure the safety and security of all club activities, it may be that a child or young person is subjected to the club's search process. In such instances, the preferred approach is that children and young people self-search under the supervision of the steward or security member. However, if concerns remain that the child or young person is concealing an item, then consent will be sought from the parent or carer before the steward or security members conducts a search on the child whilst a supervisor observes.

Risk assessments

Risk assessments will always be completed for club activities. This is to minimise and prevent risks to children and young people. Such risk assessments will consider the particular vulnerabilities or increased risks that may occur when a child is partaking in a club activity.

Examples of where risk assessments are required are:

- Trips and tours
- Transport
- Changing area
- Host family provision

Supervision

The club adheres to the best practice guidance provided by the FA in relation to the supervision of children and young people when engaging in club activities. The club also recognises that the appropriate supervision can depend on the particular activity or children attending. For example, age of children attending or location of the activity.

Use of photography and film

The club takes guidance on the use of images from the guidelines issued by the FA. Club Officials who take images will have been briefed by a member of the Safeguarding Team or by the Media and Communications team. Prior to any images being taken of children, consent will be sought from parents and carers at the start of the season each year or prior to their involvement in any club activity.

Parents and carers are responsible for informing the club of any change of circumstances within the season which may affect consent.

Parents and carers will be informed of how the image will be used. The club will not allow an image to be used for something other than that for which it was initially agreed.

Social media

The club recognises the positive benefits of the use of social media. However, it is also aware of the potential safeguarding risks of children and young people in engaging with social media platforms.

Social media is dealt with in full in the club's social media policy.

Staff should not add, befriend or follow any child under 18 who is a player or participant.

Sharing Information

The club is committed to the sharing of information to protect children, in line with Working Together 2018, the Data Protection Act 2018 and General Data Protection Act 2018.

The club will promote the 'seven golden rules' set out by the government in their guidance (Information Sharing Advice for Practitioners Providing Safeguarding Services to Children Young People, Parents and Carers):

1. Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do

so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.

5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up to date, is shared in a timely fashion, and is shared securely;
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

In line with the updated KCSIE September 2022 document the club will work with local authorities and encourage sharing of information about when a child has a social worker. The objective when this information is shared with the club, is to use it to support both education and overall wellbeing of the child when in the club's care.

Referrals and confidentiality

Where a safeguarding concern about a child or young person arises, the club may refer these concerns to the FA, statutory, external agencies and other football clubs where a trusted Safeguarding professional can be identified.

Referrals onto third parties will be made when the ongoing risk to a person requires information to be shared to enable the risk to be managed effectively.

Every effort will be made to ensure confidentiality is maintained for all concerned. Any information that is shared will be done so on a strictly need to know basis. This includes:

- The relevant person in the Club Safeguarding Team.
- The parent or carer of the child or young person who is alleged to have been abused.
- The person who made the allegation.
- If appropriate, statutory agencies, such as the police or Children's Social Services.
- If appropriate, external agencies, such as the FA and the Premier League.

Recording of safeguarding concerns

Safeguarding will result in records being made of concerns. A record of the steps taken to manage concerns as well as record of the outcomes will be made.

The Information Commissioners Office 2020 makes it clear that the handling of data containing personal information should be:

- Adequate, relevant and not excessive for the purpose for which they are held.
- Accurate and up to date.
- Only kept for as long as is necessary.

To ensure that any records being made are in line with the General Data Protection Regulation (GDPR) the club will ensure:

- Records are made for reasons of ongoing safeguarding reasons only.
- Retain records for only as long as necessary to ensure that safeguarding of children can occur effectively.
- Destroy records when they are no longer necessary.
- Record safeguarding information in a secure online space which keeps records confidentially and securely in a separate file for each child. (The system used for this is MyConcern)

Recording concerns about adult behaviour

Sometimes concerns might be raised about an adult who works or volunteers with children. This could be because they have:

- Behaved in a way that has harmed, or may have harmed, a child.
- Committed a criminal offence against, or related to, a child.
- Behaved in a way that indicated they are unsuitable to work with young people.

If concerns have been raised about an adult's behaviour around children, the records should keep in their personnel file either until they reach the age of 65 or for 10 years – whichever is longer (IRMS, 2016; Department for Education (DfE), 2020).

This applies to volunteers and paid staff. For example: if someone is 60 when the investigation into the allegation is concluded, keep the records until their 70th birthday if someone is 30 when the investigation into the allegation is concluded, keep the records until they are aged 65.

Information should be kept for this length of time even if the person stops working or volunteering for the organisation.

Records relating to concerns about an adult's behaviour should be kept in the person's confidential personnel file (not in a central 'concerns log') and a copy should be given to the individual.

Retention periods for child related records

Information relating to child protection concerns involving participants of the club will be kept until the child is 25 years old.

Safeguarding information recorded to enable the safeguarding of a child should be kept until the child leaves the club ensuring that appropriate information sharing is completed.

Support for employees

The club recognises that it can be deeply upsetting when a child or young person discloses that they have suffered abuse. The club has support structures in place to help employees who have received a disclosure or who are being asked to participate in an investigation into poor practice or abuse. If

you need further advice regarding this, contact the People & Culture Team or the Senior Safeguarding Lead.

Empower children to be heard

Across all areas of the club there is ongoing commitment to ensure that children continually have their voices, opinions and concern heard.

The club acknowledges and understands that a child's involvement in elite sport can be a reason a child may not feel comfortable or confident to speak out if there is a problem.

To ensure children have the confidence to speak out about concerns, the club should always seek the views and opinions of children on topics which involve them, this should include Policies, staff recruitment and changes to facilities.

Participant forums across the club will enable children to have their thoughts and opinions heard.

Mental health

The club is committed to the mental wellbeing of all players and staff.

The club employs a full time Mental Wellbeing Manager.

Multi-Disciplinary Wellbeing forums across the organisation take place to identify wellbeing as well as Safeguarding concerns.

Safeguarding and Wellbeing teams actively work together to manage identified concerns in line with this policy.

Review

The club will review this policy to ensure ongoing compliance with safeguarding requirements. This will occur annually, at the end of every season, or whenever there is a change in legislation, guidance, governing body rules or major safeguarding incident.

Procedures

Consent

The primary concern in safeguarding should always be the safety and welfare of the child or young person. However, it is best practice to obtain the consent of the child concerned prior to making an external referral. Nevertheless, there are several circumstances where a referral can be made without the consent of the child. These include:

- Where the child or young person is at risk of harm.
- Other people are or may be at risk of harm.
- A serious crime has been committed or by sharing the information the crime can be prevented.
- The child concerned does not have the mental capacity to make the decision to consent to the referral.

- Sharing the information with the emergency services if it is an emergency or life-threatening situation.
- An employee, consultant, volunteer, worker or agency staff is implicated.
- The risk of harm meets the threshold for a multi-agency statutory meeting.

What action should you take if you suspect abuse or poor practice has occurred?

You cannot assume that someone else will act to help the child or young person as everyone holds the safeguarding responsibility.

- You must act if you have a concern about the safety and/or welfare of a child or young person.
- You must act if you have a concern about someone's behaviour towards a child or young person.

In the event of the above, you should report your concerns to one of the following:

- A Designated Safeguarding Officer.
- Club Senior Safeguarding Manager.

What action should you take if you receive a safeguarding disclosure from a child or young person?

If a child informs you directly about their concerns about someone's behaviour towards them, this is a disclosure. This is often very difficult for a child to make, and children or young people who may be vulnerable are likely to disclose abuse to an adult they trust. It is extremely important that you know how to correctly respond to a disclosure.

Step 1

Ensure that you deal with the disclosure as it happens and make sure the immediate needs of the child are met and they feel supported. It is not your role to investigate the disclosure when it is made. Instead, it must always be taken seriously and dealt with in accordance with the club's guidance in this Policy. This is the case even if the truth of the disclosure has not been verified. Your role in this situation is only to act in the best interests of the child or young person who may be at risk.

In order to do this, you should:

- Put aside your own feelings and emotions and listen calmly, even if the information is upsetting or shocking.
- Allow the child to speak freely and try not to interrupt them as this may disrupt the discussion and lead them to feel like they are being interrogated.
- Do not worry if there are silences, let the child speak at their own pace and lead the discussion.
- Do not challenge any of the information disclosed by the child.
- Try to avoid any accusatory or leading questions, let the child tell their own story of events without pushing any information. Do not ask any questions that may make the child feel guilty or ashamed.
- Tell the child that you recognise how difficult the disclosure may be to them and reassure them that they are doing the right thing and you are taking it seriously.

- If physical abuse has taken place, you may observe any visible marks or bruises, but do not ask a child to remove or adjust clothing in order to observe them.
- Tell the child who you will be informing of the disclosure whilst emphasising that you will support them through the process.
- Respect the confidentiality of the disclosure by only informing those who need to know. Those who need to know are the people who have a role to play in protecting the child.
- Document or record the conversation whilst the child is disclosing. This should be done straight away; remember, as accurately as you can, the words and phrases used by the child to describe what has happened;
- Pass any judgment on what was said or give them impression that you may blame the child;
- Make false promises or promises you may not be able to fulfil to the child. For example, a promise that you will not tell anyone;
- Investigate, avenge or approach the abuser yourself.

Always keep in mind that when a child or younger person discloses, they may feel:

Guilt: It is possible they will blame themselves for the abuse and feel guilty about disclosing.

Ashamed: They may feel ashamed about the abuse itself or what their friends and family may think.

Confused: They may be confused about their feelings for the alleged abuser as it could be someone they look up to and trust.

Scared: They may be fearful of the repercussions of disclosing the abuse or of the alleged abuse.

Step 2

Following the disclosure, if there is an immediate risk of harm, you must call the police to protect the welfare of the child.

As soon as you have ensured the immediate safety and comfort of the child or young person, you must inform a Designated Safeguarding Officer or the Senior Safeguarding Manager. Their contact details can be found at Appendix 3.

The Senior Safeguarding Manager will ensure contact is made with the appropriate statutory agencies on behalf of the club.

If you are unable to contact the Senior Safeguarding Manager, there are other useful contacts at Appendix 3 who can provide you with advice. If you were unable to contact the Senior Safeguarding Manager, please inform them of what action was taken as soon as practicably possible.

Step 3

Use the electronic recording platform - MyConcern to record the details of the incident in line with the MyConcern guidance received upon issue of your log in details.

Wherever possible, you must record information as it was told to you using the language of the child or young person rather than your own interpretation of it.

It is important to report factual information rather than assumption or interpretation. You might convey your intuitive thoughts, but these should be recognised as such and should not form part of the record.

The record of the disclosure must be passed immediately to the Senior Safeguarding Lead, digitally if possible, at richard.valder-davis@brightonandhovealbion.com. Any original documentation must be passed to the Senior Safeguarding Manager to be stored securely.

What happens next?

You should be informed by the Designated Safeguarding Officer or the Senior Safeguarding Manager of what has happened following the report. If you do not receive this information, you should be proactive in seeking it out because it is everyone's responsibility to ensure that concerns are followed up.

If you have a concern that the disclosure has not been appropriately acted upon, you can inform the Senior Safeguarding Manager. The contact details can be found at Appendix 3. Ultimately, if you still have concerns, you should contact statutory authorities.

What action should you take where you suspect abuse but there has been no disclosure?

Sometimes a child being abused will not feel able to make a disclosure. It is therefore important to be alert to signs of abuse discussed earlier in this Policy. It is still crucial that you raise a concern where something has happened to make you aware of the possibility of a safeguarding issue. For example, an adult or child may say something about themselves or another child that may alert you to a possible abusive situation. Alternatively, you may hear or witness something that gives cause for a safeguarding concern. In such situations, it is still imperative to act.

Raising a concern

Where you have a concern, but no disclosure, about any form of safeguarding poor practice or abuse, there may not be firm evidence of abuse prior to you raising a concern. When raising a concern, it is important to give as much information as possible and fully explain what exactly has caused you to hold the concern.

First, you should raise the concern with the relevant DSO who will then raise it with the safeguarding team. They will decide the appropriate action in light of the information you have given them.

If you feel unable to raise the concern with the DSO for whatever reason, you can raise it with the Club Senior Safeguarding Lead.

Following this, if you still think there is a concern, or if you feel the matter is so serious that you are unable to discuss it with the above, you should contact Head of Safeguarding at the Premier League, Front Door for Families or Police whose details can be found in Appendix 3.

What happens where an allegation is made against employees, workers, consultants, agency staff and volunteers

If an allegation is made against someone who works within the club, there are three types of investigation that may occur. They are not mutually exclusive.

1. A criminal investigation by the police.
2. A child protection investigation by the Local Authority in a multi-agency approach;
3. A disciplinary or misconduct investigation led by the club; this may also involve the FA depending on the role of the alleged abuser.

No internal investigation will commence until the Safeguarding Manager has consulted the Local Authority Designated Officer (LADO).

The alleged abuser will be legally entitled to anonymity until they are either charged with an offence or they waive their anonymity. All employees involved in an investigation or are privy to such information have a legal duty to maintain confidentiality and only provide information to those that need to know.

The employee, worker, consultant, agency staff or volunteer who the allegation concerns will normally be informed as soon as possible after the result of the initial investigation is known.

If it is subsequently established that the allegation was false or malicious, on the basis of further investigation, a written record will be made of the decision detailing the justification for the decision. The person whom the complaint has been made against will normally be informed and the matter will be closed. Allegations that are found to be false or malicious will be removed from personnel records and not referred to in any reference.

Brighton & Hove Child Safeguarding Partnership procedures state in relation to false allegations:

Such allegations are rare and may be a strong indicator of abuse which requires further exploration. If an allegation is deliberately invented and demonstrably malicious, the employer, in consultation with the Local Authority Designated Officer, they will refer the matter to Children's Social Care to determine whether the child is in need of services or might have been abused by others.

Where a criminal investigation is continued, the person concerned will be suspended on full pay if no reasonable alternative. The reasons and justifications for suspension will be recorded.

In the event that a member of staff is dismissed or resigns in circumstances where s/he might otherwise have faced dismissal for a safeguarding related reason, the Safeguarding Manager will act in accordance with FA regulations and DBS guidelines and make the necessary referral to the DBS, the FA and the Premier League as appropriate.

What happens where an allegation is made against a child or young person?

Any allegation concerning the abuse of a child or young person perpetrated by another child or young person should be dealt with through this Policy and its Procedures. If you have safeguarding concerns or a disclosure that a child or young person has committed abuse, then you should report it immediately to the DSO or Safeguarding Manager who will seek advice from the Local Authority on the matter.

All children involved, whether perpetrator or victim, will be considered as being at risk. A thorough risk assessment of the situation will be conducted with the view to ensuring the safety and best interests of all children involved. Both alleged victim and alleged perpetrator would receive appropriate support. It will also be considered whether the alleged abuser can continue engaging in activities with the club. This will be decided on the probability of risk to others.

Covid-19 and Safeguarding

All activity across the club has seen fundamental change due to Covid-19. These changes to some degree will continue for an undefined period.

Continued commitment to safeguarding

Throughout this period Safeguarding will remain at the forefront of all activity and all routes to report and deal with concerns remain in place. Full time safeguarding staff across the club will remain in place and when activity returns a safeguarding presence through nominated individuals will be in place.

Safe online communication

Communication between club staff and children is taking place and guidance to ensure communication is safe has been produced and shared. This can be found in Appendix 5

Training and CPD

Training and CPD will continue to be delivered online where possible. This has broadened the opportunity to be delivered to harder to reach cohorts of staff, meaning a larger pool of Safeguarding trained staff across the club.

Wellbeing

During a period where all aspects of health have been challenged, welfare forums across the club are being used to track the Wellbeing of children. As return to play approaches children will be screened to ensure staff are aware of matters of significance that have occurred during the Covid-19 period. These may include, bereavement, being witness to DV, isolation. Plans to deal with these matters will be made between the Player Care, Wellbeing and Safeguarding teams.

Return to Play

Safeguarding is a key consideration across all activity when considering returning children to football. All areas of the club have considered Safeguarding as a significant area in the planning of returning to activities. Protocols have ensured that appropriate Safeguarding support is available, so staff, children and other stakeholders remain able to report concerns.

Staff contingency due to illness

In the event that the Senior Safeguarding Lead is unable to perform their role, the Senior Designated Safeguarding Officer will deputise.

Appendices referenced in this document are available on request.