



# **SAFEGUARDING POLICY AND PROCEDURES**

## **FOREWORD BY CEO**

I am delighted to provide the foreword for this updated policy which outlines the continuing commitment of Leicester City Football Club (the "Club") to develop and maintain a safe and positive environment for all individuals and members of the community whom we come into contact with on a daily basis.

Safeguarding is a key component of the Club's drive to support the safety and wellbeing of children and adults at risk. We understand the importance of constantly evolving our policies, procedures and practice to ensure the safety of the most vulnerable involved in our game. We have adopted the requirements and recommendations of the relevant football regulatory authorities in preparing this new policy. We also work in close partnership with the Disclosure and Barring Service (DBS) and the National Society for the Prevention of Cruelty to Children (NSPCC) to ensure that we have robust and effective risk management procedures in place when recruiting employees and volunteers, who will have regular/occasional unsupervised contact with or influence over children and adults at risk within the Club and the Community Trust.

We constantly strive to prevent abuse, bullying and neglect to ensure that everyone has access to the opportunities that the Club is able to provide both internally and externally within the local community. It is the responsibility of everyone who has contact with children and adults at risk to create a positive environment in which they can participate, and to protect them from harm. This policy strives to achieve a framework and guidance for best practice for everyone involved in delivering activities across the Club environment. Implementation of the procedures and guidance in this document will ensure consistency across all Club activities and serve to minimise any risks.

As a Club we have developed a reputation for best practice in the safeguarding field and we are always proactive in adapting to the new challenges that arise in our diverse activities. Processes and procedures have been put in place to ensure that we continue to maintain and indeed improve this reputation for years to come.

**Susan Whelan**  
**Chief Executive Officer**  
**Leicester City Football Club**

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## SAFEGUARDING POLICY AND PROCEDURES

### Introduction

The Club aims to adopt the highest possible standards and takes all reasonable steps to safeguard the children and adults at risk with whom it engages.

“**Child and children**” means any person under the age of 18 and “**Adult(s) at risk**” means any person aged 18 or over who has needs for care and support (whether or not the local authority is meeting any of those needs) and is experiencing, or at risk of, abuse or neglect and as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of, abuse or neglect. This may include people with learning disabilities, sensory impairments, mental health needs, older people and people with a physical disability or impairment. It may also include people who are affected by the circumstances that they are living in, for example, experiencing domestic violence (this list is not exhaustive). An individual's level of vulnerability to harm may vary over time depending on the circumstances they are in and their needs at that time.

We take our safeguarding responsibilities very seriously and particularly where children and adults at risk are present at any of our Club-led activities, at our premises and/or under the supervision or care of one or more members of our staff. As a result of their roles and responsibilities at the Club, staff have a “duty of care” towards the children and adults at risk with whom they come into contact during their employment to keep them safe; this can be exercised through the development of respectful, caring and professional relationships between adults and children/adults at risk.

All participants and visitors to these activities have the right to feel and be safe, valued and respected. Wherever they come into contact with us, they will be treated lawfully and fairly and with both dignity and respect. All the members of our staff have a duty to keep children and adults at risk safe and to help protect them from abuse or harm. All managers must ensure that their staff understand and apply that duty at all times.

This policy applies to all members of staff (including volunteers) of Leicester City Football Club, the Community Trust and all partner organisations including commercial partners, licence holders, contractors, consultants and Trustees. It also applies to individuals not included in this list who may be conducting related work that involves the children and adults at risk in our care. For the avoidance of doubt, staff includes the Premier League definition of staff which is “any person employed or deployed by a Club or Club Community Organisation whether in a paid, voluntary, consultancy or third party capacity”.

This policy has been prepared in accordance with Working Together to Safeguard Children July 2018 and other legislative requirements (including, but without limitation, The Children's Act 1989 and 2004), The FA Premier League Rules (in particular Section S, the Safeguarding of Vulnerable Groups and Safer Recruitment) and The English Football Association (including The FA Safeguarding Children Rules) to ensure national standards for safeguarding are met and implemented throughout the Club. The Club has also consulted with an expert in safeguarding (formerly a Director of Children's Services) and will supply a copy of this policy to the Local Safeguarding Children's Board (LSCB).

### Safeguarding Context

The term “safeguarding” is a shortening of the phrase “safeguarding and promoting the welfare” of children and adults at risk.

### Purpose of this Policy

By implementing this policy across all Club operations, all members of staff will understand that they have a responsibility to work together to safeguard children and adults at risk and that:

- the individual's safety and welfare is of paramount importance, particularly where children are involved;
- all people, regardless of age, gender, racial origin, political or religious belief, sexual identity and or disability, have a right to enjoy sport and associated activities of Leicester City Football Club, free from abuse and all forms of bullying, harassment and discrimination;
- all individuals and organisations involved with Leicester City Football Club have responsibilities for the welfare of children and adults at risk in our activities and are bound by this policy; and
- all individuals and organisations involved with Leicester City Football Club must act in accordance with the law in relation to such matters.

For Club operations, it also means: supporting 'Safer Recruitment' processes through promoting good practice for those working amongst our staff; supporting them where necessary; ensuring staff are competent, well-managed and challenged when engaged in poor practice; and, finally, taking action where concerns arise.

## **LEICESTER CITY FOOTBALL CLUB SAFEGUARDING FRAMEWORK**

This policy is the basis for a Club safeguarding network that seeks to implement a clear and effective programme of work that is embedded across all staff.

### **Our Safeguarding Vision**

The Club will:

- proactively seek to promote the welfare, rights, wishes and feelings of children and adults at risk;
- recruit, train and supervise staff to adopt best practice in order to safeguard and protect children and adults at risk from abuse and themselves from false allegations; and
- ensure that safeguarding concerns or allegations of abuse are taken seriously and responded to efficiently and appropriately.

### **Our Safeguarding Aims**

1. to provide a safe and welcoming environment for children and adults at risk involved in any Club-led activities, wherever they are in the world, free from abuse and fear of abuse in all its forms;
2. to establish and maintain a culture where safeguarding practice is widely understood, openly discussed and where all staff recognise the role they play in keeping children and adults at risk, themselves and their colleagues, safe from harm;
3. to develop a clear system which promotes and supports constant vigilance, prevention and early intervention in safeguarding matters and, where necessary, prompt and thorough action in response to any reported concerns or incidents;
4. to apply legislation, government policy and guidance and football governing body regulations, policy and guidance where applicable; and
5. to work closely together with local statutory agencies and other partners to promote and safeguard the welfare of children and adults at risk.

In order to realise these aims, we are committed to:

- **work or liaise with relevant football governing bodies, statutory agencies and other child welfare bodies** (e.g. Child Protection in Sport Unit, Premier League, The FA etc, to ensure we meet all necessary regulations and standards in respect of our safeguarding practice;
- **listen to children and adults at risk** and take them seriously, consult with them when developing processes and react appropriately to ideas, feelings and concerns, then address them in a fair, effective and timely manner;
- **develop and communicate a series of clear policies, protocols and guidance** designed to help deliver sound governance and good practice across the Club's activities;
- **co-ordinate an effective network of designated Safeguarding Officers** across the Club who will promote the highest standards of safeguarding in their respective areas of the Club;
- **maintain a visible safeguarding presence** across all areas of the Club including on internet platforms;
- **monitor activities** taking place at Club facilities and those at off-site locations;
- **provide training, advice and support** across all areas of the business where children and adults at risk are involved in any Club-led activity;
- **support and help deliver the Club's 'Safer Recruitment' philosophy** in accordance with local legislative and regulatory requirements and in partnership with the HR department;
- **maintain confidentiality** of all information and documentation relating to DBS disclosures, concerns, allegations and incidents in accordance with relevant data protection legislation;
- **share sensitive information with the relevant authorities** when it is appropriate to do so and in the knowledge that the information will be treated confidentially;
- **appoint Safeguarding Officers** in different areas of the Club to ensure this policy and procedures are followed.

#### WHO DOES THIS POLICY APPLY TO?

To illustrate the scope of this work, the list below provides an extensive list (though not exhaustive) of examples or situations across the Club where we need to consider the welfare of people in our care:

- players involved in Academy or associated development programmes;
- under-18 players who are part of open-age/senior squads;
- children and adults at risk taking part in Community Trust activities;
- supporters with disabilities and other vulnerabilities contacting the Club, visiting the stadium on matchdays, or visiting for other pre-arranged activities (e.g. stadium tours);
- young players on tour or living for significant time away from their families in Leicestershire-based accommodation;
- any children or adults at risk visiting the Club's stadium for matches, events, concerts or tours;
- ball persons, matchday mascots, player escorts and flag-bearers;
- support to those who may be vulnerable to bullying or cyberbullying through their relationship with any of the Club's activities;
- participants on commercial football school-type programmes or similar;

- young people under 18 attending as volunteers, on organised work experience or as apprentices;
- children and adults with disabilities taking part in any Club activity;
- children and adults at risk involved in activities organised by other agencies benefitting from the Club's charitable programmes; and
- those with additional vulnerability e.g. looked-after children, those in care, those with mental health issues, physical and learning difficulties. The Club will carry out appropriate risk assessments to ensure there is always an appropriate staff-to-participant ratio in respect to needs and age.

## **MANAGING CLUB BEHAVIOUR**

The Club takes a positive approach to behaviour management and, where necessary, develops policies that all staff must apply. Such policies will recognise the following general principles:

1. Every person is different and as such has individual needs;
2. Participants should be encouraged to help develop their own codes of conduct or have clear and well communicated guidance on expectations;
3. Behaviour is usually a reflection on how a person is feeling;
4. Staff should recognise that many other factors can affect behaviour – weather, hunger, medical conditions and/or medication and account for these in any action taken;
5. Challenging, aggressive or violent behaviour presents risks to the individual and others, and physical intervention with any individual displaying such behaviour is only ever a last resort in exceptional circumstances – any response must be reasonable and proportionate;
6. Training will be provided to members of staff who may experience challenging behaviour;
7. Physical punishments will never be used by our staff, though diffusion and de-escalation techniques may when necessary; and
8. All significant incidents should be recorded and passed to the Head of Safeguarding.

## **DATA PROTECTION**

The Club takes the matter of data protection very seriously and particularly the data collected in respect of children and adults at risk. The Club will apply the principles set out in the General Data Protection Regulation (GDPR) and other current relevant data protection legislation including the Data Protection Act 2018 in respect of our data collection activities. Where data is collected (in writing or electronically) relating to children, or children are asked for personal details, we will make every effort to obtain agreement for its use from those with parental responsibility. We will seek parental consent if the collection or use of information about a child is likely to result in:

- disclosure of a child's name and address to a third party, for example as part of the terms and conditions of a competition entry or partnership activation;
- use of a child's contact details for marketing purposes;
- publication of a child's image on a website that the public can view (subject at all times to the Club's terms and conditions relating to access to King Power Stadium on matchdays); or
- the collection of personal data about third parties, for example where a child is asked to provide information about his or her family members or friends.

In the event a family member of a child or young person asks for a photograph to be removed, this shall be done without delay.

## **Photography and Video Images**

### **Celebrating Activity**

The Club welcomes photographs and images that celebrate the sport, the values and objectives of the Club, and positive reflections of our Club operations. We understand however that photography and video imagery and its use can present difficulties, risk and sensitivity in a range of circumstances. During the course of our activities it is foreseeable that a child's image may be captured by appointed photographers in digital photographs and in film. These images may then be used by Club staff and contractors in both internal and external news and marketing publications and online via websites and social media.

### **Data Protection Law and Photography**

Data protection law may apply to the photography of children and adults at risk at Club activities. Where it applies and where practical, if images are captured by a member of staff or for Club purposes, informed and specific consent from the parent/carer or adult at risk should be obtained. If in any doubt a picture should not be taken.

### **Video or Photographs as a Coaching or Management Aid**

The recording of training or match footage is a legitimate coaching aid and as such, parents and players are made aware that this is part of the coaching programme. No footage is taken for scouting purposes. Only parents can access footage of their child taken at training or at matches. Similarly photographs of matches or players for management purposes (e.g. ID passes or databases) are regularly taken. Both these types may be covered by data protection law. As such, all those responsible for the recording of this footage must:

- adhere to this policy;
- take responsibility for the safe storage and distribution of the images;
- give due consideration to the dignity and protection of the players involved; and
- obtain specific additional consent from parents where there are changes to the planned use of the footage which will lead to a wider distribution of the images than originally anticipated.

All video footage or photographs taken will only be captured and/or stored on Leicester City Football Club IT devices. No staff should use their own devices for this purpose.

### **Consent**

Where an activity may allow for the capture, and thus use, of a participant's image, the manager responsible must develop appropriate documentation (forms and guidance) and associated processes to allow for the management of parental consent for children (or participant consent in respect of an adult at risk) and ensure that those individuals understand what they are consenting to and why.

### **Right to Choose Not to Consent**

Other than on match/event day (see below), individuals have the right not to give consent or revoke their consent to being photographed/filmed. Here our staff will endeavour to make suitable arrangements to apply any restrictions required whilst also minimising the disruption to normal Club activities. These arrangements will be agreed in advance with those with parental responsibility for the child and must uphold the dignity of the participant choosing not to consent.

### **Storage**

All images, whilst held by the Club, will be securely stored on the Club's IT systems or secured cloud-based servers and remain the Club's property at all times. Where footage is passed to players and parents for training and development purposes, this must not be passed on further or published without the written permission of the Club's management staff. Families must be made fully aware of this restriction at the point of distribution.

### **Match Day, Events, Incidental Image Capture and Implied Consent**

Large crowds create further issues with consent and image use. At events such as matches, concerts and special events, consent is assumed to be 'implied' in that any person attending should expect that their image may be captured or broadcast. In any situations where children may be subject to 'incidental image capture' (i.e. they are in the background behind a main subject), where practical they should be informed that they may be on camera and have the opportunity to choose not to be photographed/filmed.

Where consent has not been given but images have been accidentally captured, those images should follow the guidelines shown below but also should be of a general nature capturing the activity and not the individual and should not use children's names in resulting public use.

Where a person finds that their image or that of their child has been used in these circumstances and they do not wish it to be used, then we will endeavour to remove it from circulation where it is practical to do so and where there are reasonable grounds to do so.

### **Parents, Other Children and Other Photographers**

The Club recognises that in some circumstances parents, other family members and friends may wish to take photographs of their children or relatives. The Club will develop clear rules on what is acceptable. Where a member of staff or child or parent has a concern about the capture and use of images, they should report it immediately to the activity or site manager.

With the advent of smart phones with digital cameras and instant connectivity to the worldwide web, the scope for the capture and sharing of images has increased dramatically and as such, activity managers should take care to apply the policy firmly and fairly.

In general, members of staff capturing images must avoid:

- using their own/personal equipment to capture images of participants;
- images taken in changing rooms or where children are not fully clothed;
- images of children who wish not to be in the photograph or whose parent does not wish them to be;
- images where children are more vulnerable – upset, injury, illness;
- images that are sexually suggestive or provocative; or
- the inclusion of children's full names in any captions, kit or reports.

### **RESIDENTIAL ACCOMMODATION**

The Club may in the course of its activities be required to provide both short and long term accommodation for young participants under 18. This may occur in a range of settings and may be arranged by or involve Club staff, such as:

- trips and tours involving overnight stays for children or players under 18;
- Academy players living in Club facilities or in domestic settings with approved host families;
- young players on trial with Academy teams;

- children and/or adults at risk participating in Community Trust programmes or projects;
- commercial activities delivered in partnership with third party operators responsible for the provision of accommodation.

It is vital that wherever such situations arise, the highest level of diligence is provided to the arrangements. Managers must ensure that all applicable legislation, regulation and good practice (from that host country) is applied to any of the above settings and that any relevant authorities are consulted with throughout the planning and operation of these provisions.

The same level of diligence is required where a third party is responsible for making accommodation arrangements for children and adults at risk in our care. It is the responsibility of our staff to ensure that third party operators maintain our high standards of care.

### **Selection of Carers**

The appointment of any staff or carers (including host families and/or host parents) with responsibility for the supervision of children overnight in residential settings and/or Club accommodation must be carried out in accordance with this policy and must apply Safer Recruitment principles to ensure suitable appointments are made. As a minimum these staff must:

- undertake the appropriate criminal record check (e.g. Enhanced DBS in the UK);
- supply at least two references;
- have their qualifications, identity and references checked;
- have completed appropriate safeguarding training and/or residential care training.

See LCFC Accommodation Policy for further information.

### **SAFEGUARDING AND THE CLUB'S STAFF**

Safeguarding is also about ensuring that all staff, volunteers and partners understand the role they play in protecting children and adults at risk. Across the Club there will be a wide range of employment and deployment arrangements involving full-time or part-time permanent staff, consultants, sessional staff or volunteers.

The staff are what makes this policy 'live'. This means all members of staff who are involved in training, managing, supervising or caring for children and adults at risk.

They must work conscientiously to help keep those in their care safe from harm. They must also be aware of how to keep themselves and their colleagues safe from having allegations made against them by maintaining professional boundaries and avoiding behaviour that may be misinterpreted by others. In turn this has a direct impact on maintaining the reputation of the Club.

### **Positions of Trust**

As a result of the roles and authority that many members of our staff hold, they are considered to be in a "position of trust" in relation to those in their care, which carries authority, status, power and responsibility. Examples of positions (and relationships) of trust include but are not limited to: a member of the Community Trust working with children or adults at risk, a coach, a team manager, a scout, a physiotherapist, a driver, a learning mentor/tutor, an apprenticeship supervisor as well as staff engaged in matchday activity involving children and young people including supervising mascots, stewards, hosts/hostesses, catering personnel and photographers.

If the adults involved are positive role models displaying high moral and ethical standards, the benefit to children and young people's development can be significant. This means that where any staff are in a position of power and influence over children and adults at risk they must not abuse their position for personal advantage or gratification or that of others. Any such abuse will be regarded as gross misconduct. Staff must also report any concern they have about another member of staff to a designated Safeguarding Officer.

All members of staff working with children and adults at risk are required to sign up to and thereby agree to the principles as set out in the "Premier League Guidance for Safer Working Practice".

### **Age of Consent, Children and Positions of Trust**

This policy considers a child to be someone who is not yet 18 and as such, emotionally dependent. An intimate or sexual relationship between a member of staff and a child or adult at risk in their care is prohibited and will be subject to disciplinary action. A breach of this rule is considered an act of gross misconduct and will result in a referral to the relevant statutory agency. For the absence of doubt, this applies to members of staff and participants who may have travelled overseas from their country of origin or those travelling abroad as representatives of the Club.

### **Standards of Behaviour - Adults**

Our staff will adopt the highest standards of behaviour at all times in order that they maintain the confidence and respect of children and adults at risk, parents, customers, supporters and colleagues. Within the scope of their duties, their actions should always be reasonable, appropriate, warranted, proportionate, safe and applied equitably.

Staff should be aware that:

- behaviour outside of work time may impact upon their suitability to work with children and adults at risk;
- breaches of the law and of this policy may result in criminal and/or disciplinary action being taken against staff.

### **INFORMATION AND COMMUNICATION TECHNOLOGY (ICT)**

ICT is used across the Club in many and varied ways. Its use will continue to grow and change with new developments in technology and fashion. It is used to communicate with supporters, customers, players and the media. The Club will:

- develop and maintain clear policies on suitable and appropriate use of the internet, email, SMS, and social media;
- ensure that consent of parents is obtained if staff use SMS, email or other electronic means of communication with a child for programme-related reasons;
- raise awareness amongst young participants (especially Academy players) and participants involved via the Community Trust regarding safer internet/social media use in respect of their position;
- raise awareness through training and internal communications with staff regarding appropriate use of such media and the importance of both professional and personal online activity;
- have a zero-tolerance approach to 'cyberbullying', sexting, grooming and exploitation;
- respond quickly and appropriately if there is any inappropriate use of the internet and social media by players, participants or members of staff.

## TRAINING

Safeguarding personnel will receive training across a broad range of the safeguarding landscape. We will also work with players and parents to raise awareness of safeguarding issues that may affect them (such as social media issues).

## CONSENT

The Club recognises the importance of approaching the individual needs of children and adults at risk in the appropriate way and according to the law and statutory guidance. Where a child is at risk of harm, consent to act on concerns is not normally required in law although consent from and consultation with those with Parental Responsibility is considered good practice unless this would put the child at greater risk of harm.

### Consent and Best Interests

**Children:** We will always respect the right of a child to have their say when a decision that affects them is being taken. We will take their views into account and always act in their best interests when a decision is made, especially when a child is at risk of harm or may have come to harm. A child's parent or legal guardian will also be consulted and consent obtained as a matter of course before any action is taken unless this may put the child at increased risk of harm. Care should be taken to seek and establish the consent of all those with parental responsibility for that child. Where a parent or legal guardian cannot give consent at a point where it may be required, staff will always act in the best interests of the child.

**Adults:** If an adult who may be at risk of abuse has the capacity to consent then they must have the opportunity to consent before a decision is made that affects them – e.g. passing on a concern to statutory agencies. Club staff will assume that an adult has the capacity to consent unless it is established that they lack this capacity. **A seemingly unwise decision should not be mistaken as lacking capacity.** We will always act swiftly (and possibly without consent) where the individual is put at immediate and significant risk of harm and will always act in their best interests.

**Best Interests:** Any decisions taken on behalf of someone who is deemed, at the point where a decision must be made, to lack capacity or unable to give consent, will be taken in his or her best interests. Where possible, Club staff will take into account (known) past or future wishes and religious or moral beliefs.

## STAFF RECRUITMENT

The Club recognises that anyone may have the potential to harm or abuse children and adults at risk in some way and is committed to taking all reasonable steps to ensure that unsuitable people are prevented from working with children and adults at risk. In furtherance of this, the Club has a detailed Safer Recruitment and DBS Policy (which can be found in Schedule 4) which sets out the Club's safer recruitment processes in full.

The LCFC Safer Recruitment Process appended to the Safer Recruitment and DBS Policy demonstrates the Club's commitment to safeguarding in recruitment and selection and the embedding of safeguarding in the Club's recruitment and selection processes and procedures.

When recruiting for all posts with regular/occasional contact with or influence over children and adults at risk, the Safer Recruitment Policy ensures that all stages of the recruitment process and beyond, contain measures to deter, identify, prevent and reject unsuitable people from gaining access to children and adults at risk who come into contact with the Club.

The Safer Recruitment and DBS Policy (and associated policies and procedures) should be referred to for full details of the Club's safer recruitment processes but include in particular:

- an **interview process which assesses the applicant's suitability** for the particular role, their attitude towards children and adults at risk and their ability to perform the role;
- in line with Premier League rules, **obtaining at least two written references** for all posts with regular/occasional contact or influence over children and adults at risk before a post is offered, with one reference from the last employer or from an organisation which has knowledge of the applicant's work or volunteering with children and adults at risk;
- requiring the **completion of a Self-Declaration Form** as appropriate to the role which requires staff to disclose any convictions, cautions, reprimands or warnings as part of the recruitment process and imposes an ongoing obligation to disclose any that arise during the course of employment, in order that appropriate safeguards are put in place;
- ensuring **all relevant pre-employment checks are completed** for prospective new starters including right to work checks, the validation of any essential qualifications, a **DBS check** for eligible roles and/or identity check, which should identify name, current address and date of birth;
- ensuring that, when a positive disclosure is received or issues are raised in the references and pre-employment checks, the appointment decision is made by the respective Department Manager in conjunction with the Head of Safeguarding or the Safeguarding and Welfare Officer after carrying out a risk assessment process;
- routinely **renewing DBS checks every three years** for all roles that are eligible for a check.

Further all staff must complete a **Safeguarding Induction** which is specific to their role to ensure that they understand their responsibilities for safeguarding and how to report any concerns. All staff who have regular/occasional contact with or influence over children and adults at risk will also be required to attend ongoing regular **safeguarding training** relevant to their particular role.

## **PARTNERSHIPS AND COMMISSIONED SERVICES**

The Club will actively promote safeguarding within all partnership working and commissioned services involving children and adults at risk and will seek to establish minimum safeguarding standards by assessing the partner or external provider's suitability, ensuring that they have appropriate safeguarding policies and procedures in place and determining how to manage any safeguarding concerns that may subsequently arise. Such considerations shall be made explicit in any contract or service level agreement with any partners or external providers.

## **RAISING CONCERNS**

Safeguarding concerns fall into one of the following types:

1. the behaviour of an adult towards a child or adult at risk;
2. the behaviour of a young person towards other children (including bullying by peers);
3. risks identified through recruitment processes (e.g. criminal records information);
4. information about an individual provided by statutory agencies or other route;
5. allegations of abuse; or
6. concerns about harm to a child or adult at risk that has taken place outside of a Club activity (e.g. at home or school) but identified within a Club activity.

For members of staff these concerns can apply to both their professional and personal lives and poor conduct in either may affect their position in the workplace.

### **Raising Concerns and Mandatory Reporting**

If any member of the Club's staff has a concern about a child or an adult at risk, they have a duty to refer this to the Head of Safeguarding or the Safeguarding and Welfare Officer. The Safeguarding and Welfare Officer will in turn report any concerns to the Head of Safeguarding. If there is immediate risk of harm, a serious injury or a criminal offence may have been committed, then the police or other emergency services must be involved at the earliest opportunity.

Where a very serious concern is raised that involves a child or adult at risk involved in Club-led activity or a member of staff is involved in an allegation against a child or adult at risk, the Executive Board member with responsibility for safeguarding (currently the CEO) must be informed. The Head of Safeguarding will inform all the safeguarding contacts within the relevant football authorities (including The FA Premier League and The FA) immediately.

### **Whistleblowing**

The Club views the reporting of concerns by members of staff as a vital element of maintaining its core values. Individuals are strongly encouraged to report incidents of malpractice where the law, Club policy or protocol has been breached by another member of staff. Such reports may be made to the HR department, to a Safeguarding Officer or a Line Manager and, where appropriate, the information will be shared. Failure to do so may result in disciplinary or criminal action.

### **Referral Management**

Where a concern is raised relating to the behaviour of a member of staff towards a child or an adult at risk, there is a need to manage that referral in a swift and confidential manner.

Where the concerns could be of a serious nature, a referral to the police or Children's Services should be made at the earliest opportunity with the direction and assistance of the Head of Safeguarding.

### **Allegations against Staff, Students and Volunteers**

The responsibility for responding to concerns, allegations or disclosures in respect of staff, students and volunteers rests with the Head of Safeguarding who will pass this information onto the Senior Safeguarding Lead (currently the CEO of the Club).

An individual staff member's knowledge of a concern, allegation or disclosure places a responsibility on the individual member of staff, whatever their role, to ensure that action is taken. It is their responsibility to:

- report the information about members of staff or students or volunteers to the Head of Safeguarding or the Safeguarding and Welfare Officer immediately;
- make a signed, dated record of what has been noticed, said and done and give this to the Head of Safeguarding; and
- ensure that they maintain complete confidentiality.

### **Monitoring and Record Keeping**

It is important that all staff record, without delay, anything which they observe or have been told where a concern has been identified. If possible they should find a quiet place and endeavour to write an accurate record, whilst being scrupulous in leaving out their own feelings and remaining objective throughout.

Reports should be made on the appropriate paperwork (within that working day). If the

appropriate form is not to hand, all written evidence recorded at the time will need to be attached to the appropriate paperwork. This is important in the event a case goes to court and will form the basis of legal evidence.

If a child or an adult at risk has told you something, it is important that it is written down in their own words. If a child or adult at risk has difficulty telling their story to the extent that they stop because they have started crying, this must be noted.

All reports must be kept factual and not subjective. Reports must include the following:

- name of the child or adult at risk;
- nature of concern;
- date and time of particular incident; and
- a note or sketch of injury, i.e. its size and appearance (where possible use Leicester City Football Club "Body Form" which is available through the Head of Safeguarding or the Safeguarding and Welfare Officer).

The above information must be entered onto the appropriate paperwork in conjunction with the Head of Safeguarding or the Safeguarding and Welfare Officer.

#### **When is a record required to be made?**

- marks on a child's or adult at risk's body;
- information from others;
- unusual, different behaviour;
- puzzling statements or stories from the child or adult at risk; and/or
- mood changes that appear drastic.

#### **What should be recorded?**

- patterns of attendance;
- changes in mood;
- changes in functioning/training;
- changes in behaviour, becoming aggressive, passive; and/or
- changes at home/within family.

The Club will keep a record of all incidents and concerns reported to its Safeguarding team. Any such reports will be taken seriously, carefully recorded, acted upon where appropriate and confidentially retained. Records will be regularly reviewed in order to identify patterns of behaviour that may give rise to concern.

#### **Appropriate Questioning**

This area is a specialist one. It should only be undertaken by social workers or police officers. Remember that a child or adult at risk may be asked to talk to someone else at a later stage. The interviewer should try to listen without interrupting them or asking questions, allowing them to talk at their own pace and in their own words. The child or adult at risk should always be empowered by being told that they have done the right thing and that it will be taken seriously.

#### **Confidentiality**

All information collected and stored, whether verbal or written, will be treated with the utmost sensitivity and handled in accordance with relevant data protection legislation. The Head of Safeguarding or the Safeguarding and Welfare Officer may be required to report or refer these matters to another agency such as a sport governing body or local authority.

The purpose of confidentiality is to protect children or adults at risk by ensuring appropriate privacy to them and their parents/carers. The Club will ensure that abusers are not assisted in their intentions by gaining access to confidential information.

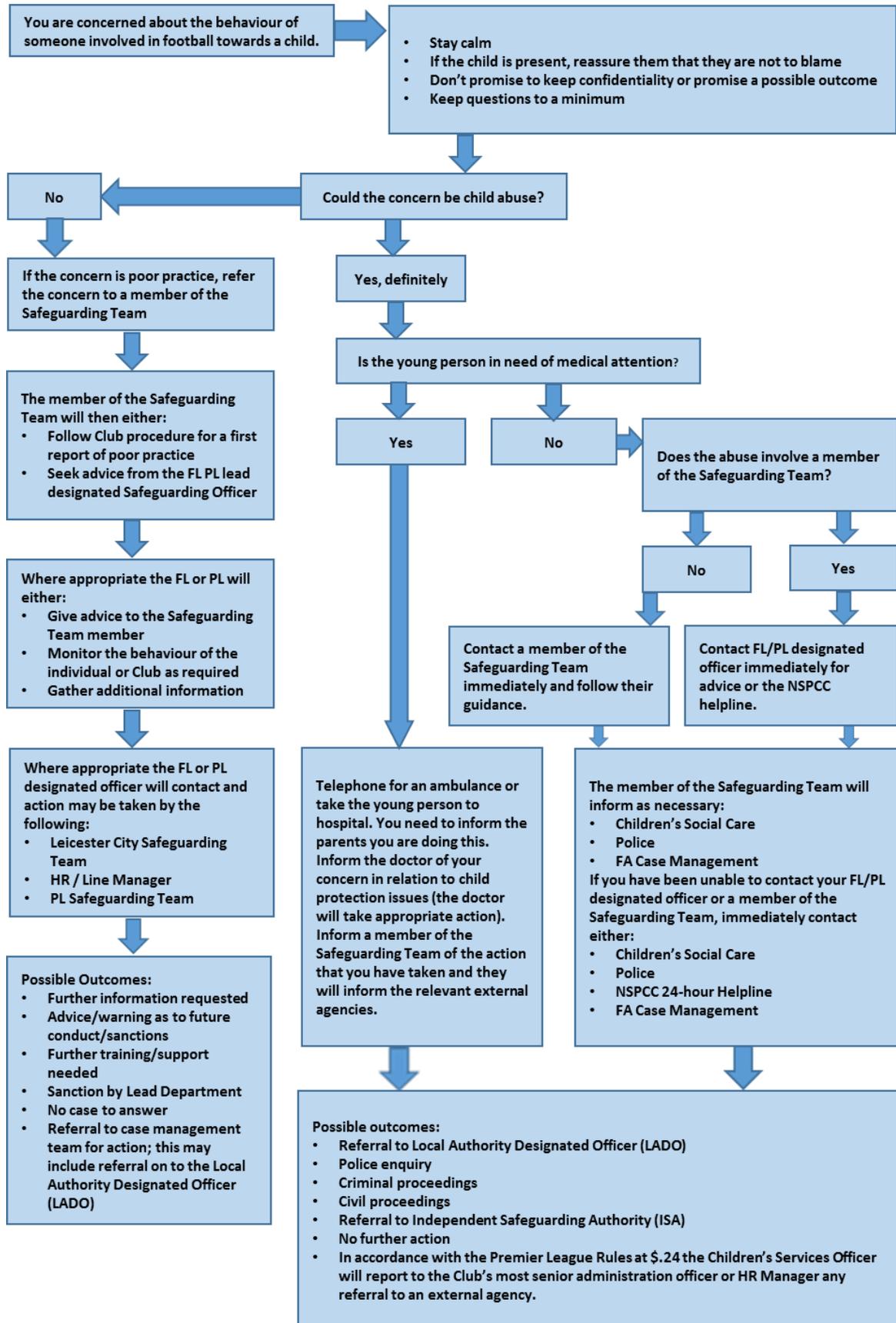


Written or verbal information should be shared only on a need-to-know basis. All safeguarding/child protection records/monitoring should be kept away from other types of Club documentation. This information should be kept in a secure place, which can only be accessed by the relevant personnel including the Head of Safeguarding.

All staff must be aware that they cannot promise a child that they will keep secrets.

**Schedule 1**

**DEALING WITH CONCERNS IN A FOOTBALL SETTING AT LEICESTER CITY FOOTBALL CLUB**



## Schedule 2

### WHAT IS ABUSE AND WHAT THINGS MIGHT RAISE CONCERNS?

#### CHILDREN AND ABUSE

In respect of children, the Football Association of England defines abuse in five categories. These help to explain what abuse and harm are. The categories are based on the Working Together 2018 mandatory guidance published by the UK Government. They also form the foundation of the "International Safeguards" framework and are: neglect, physical abuse, sexual abuse, emotional abuse and bullying. The Club recognises 'hazing' as a form of abuse; this is a term that originates in the United States but is becoming more widely used.

The Club has adopted this framework together with other recognised areas of abuse in line with current accepted and Premier League safeguarding practice. The Club also considers that these categories apply to adults at risk in the context of settings/situations akin to adults but a more detailed explanation of areas of abuse more specific to adults at risk is presented separately below. The Club considers financial abuse and fraud as further risks that may apply to both young professional players and adults at risk.

#### Neglect

Neglect is the persistent failure to meet children's or adults at risk's basic physical and psychological needs, e.g. for food, warmth and clothing, or emotional needs such as attention and affection. It occurs if children or adults at risk are left alone or inadequately supervised or where they are exposed to danger, injury or extreme weather conditions.

In activities, neglect could occur if children or adults at risk do not have proper supervision, clothing or are allowed or encouraged to play whilst injured. It could occur if a child's or adults' needs are disregarded before, during or after a game or training.

#### Physical Abuse

Physical abuse occurs if people physically hit, burn, poison, shake or in some way hurt or injure children and/or adults at risk, or fail to prevent these injuries from happening.

In sport, physical abuse could happen where training methods are inappropriate for the developmental needs of the child or adult at risk, where they are allowed to play with an injury or where inappropriate drugs or alcohol are offered or accepted, where a child or adult at risk is hit or physically restrained or manhandled by those supervising the game or training session.

It should be noted that only clinical medical officers/consultant paediatricians should diagnose when an injury is non-accidental. It is not the responsibility of staff to determine the cause of injury (except where these are football-related injuries).

#### Sexual Abuse

Sexual abuse occurs if children or adults at risk are used to meet another person's sexual needs. This includes any form of sexual behaviour with a child or adult at risk (by an adult (male or female) or another child/peer respectively), the use of sexually-explicit language and jokes, inappropriate touching, exposure to pornographic material, being made to watch sexual activities or encouraging children or adults at risk to behave in sexually inappropriate ways.

Sexual abuse can occur in sporting settings, for example, where there is inappropriate touching, where sexually explicit jokes occur between adults and children or adults at risk or if indecent images are taken or adapted, shared and/or placed on child pornography sites.

### **Child Sexual Exploitation (CSE)**

CSE is a form of sexual abuse. It involves exploitative situations, contexts and relationships where children receive something, e.g. drugs, alcohol, gifts, money. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity.

Sexual exploitation can take many forms ranging from seemingly consensual relationships where sex is exchanged for affections or gifts, or seriously organised crime from groups or gangs.

Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. (Staff working in the Community Trust are most likely to identify and work with or support children at risk of CSE.)

### **Grooming**

Grooming is defined as developing the trust of an individual for the purpose of sexual abuse, sexual exploitation or trafficking. Grooming can happen both online and in person.

### **Emotional Abuse**

This is the persistent emotional maltreatment of a child or adult at risk that causes severe and persistent adverse effect on their emotional development.

Examples of emotional abuse include frequent threatening, taunting or sarcastic behaviour, the with-holding of affection by a parent or legal guardian or extreme over-protectiveness. It includes racist or sexist behaviour and demeaning initiation ceremonies. It can be inflicted by other children and peers respectively as well as by adults. Children and adults at risk who are being abused or bullied in any way will also experience emotional abuse.

In sport, coaches or parents emotionally abuse children and adults at risk if they constantly criticise, abuse their power or impose unrealistic pressure to perform to a high standard. It may also occur if a Club allows members to deride people with disabilities or from minority cultures and use derogatory language about them or to them.

### **Bullying**

Persistent or repeated hostile and intimidating behaviour e.g. name calling, exclusion or isolation, spreading rumours, threatening to cause harm, physically hurting someone, damaging their possessions and online/cyberbullying.

### **Cyberbullying**

The use of technology to harass, threaten, embarrass, humiliate, spread rumours or target another person. By definition, it occurs among children. When an adult is the victim, it may meet the definition of cyber harassment or cyber stalking.

### **Discriminatory Abuse and Bullying**

Abusive or bullying behaviour because of discrimination occurs when motivated by a prejudice against certain people or groups of people. This may be because of an individual's ethnic origin, colour, nationality, race, religion or belief, gender, gender reassignment, sexual orientation or disability. Bullying behaviour may include unfair or less favourable treatment, culturally insensitive comments, insults and 'banter'.

### **Peer on Peer Abuse**

Children can be taken advantage of or harmed by adults and by other children. Peer on peer abuse is any form of physical, sexual, emotional and financial abuse and coercive control, exercised between children and within children's relationships (both intimate and non-intimate). Peer on peer abuse may also occur between and within adults at risk relationships.

Peer on peer abuse can take various forms, including: serious bullying (including cyberbullying), relationship abuse, domestic violence, child sexual exploitation, youth and serious youth violence, harmful sexual behaviour, and/or gender-based violence.

### **County Lines and Child Criminal Exploitation**

County lines is 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; this often involves taking over the home of an adult at risk who is unable to challenge them. County line gangs pose a significant threat to children and adults at risk upon whom they rely to conduct and/or facilitate such criminality. Child criminal exploitation is common in county lines and occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology; and it is broader than just county lines, including children being forced to work on cannabis farms or to commit theft.

### **Female Genital Mutilation (FGM)**

FGM comprises all procedures involving the partial or total removal of the external female genitalia or any other injury to the female genital organs for non-medical reasons. FGM is a criminal offence in the UK; it is also a criminal offence for UK nationals or permanent UK residents to take their child abroad to have FGM. FGM is considered to be child abuse in the UK and causes significant harm and constitutes physical and emotional abuse.

### **Radicalisation and Extremism**

Radicalisation: refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism. Identifying someone who is being radicalised or exploited can often be difficult as there is no single pathway to an individual being radicalised. Safeguarding from radicalisation is no different to protecting from other forms of harm. Staff are not expected to be an expert in identifying signs of radicalisation and extremism, but they need to be vigilant and ensure that they respond swiftly and appropriately to any concerns. The following signs could be used as a guide.

- **Vulnerability:**
  - identity crisis – distance from cultural/religious heritage and feeling uncomfortable with their place in society around them;
  - personal crisis – family tensions or trauma, sense of isolation, low self-esteem, disassociating from existing friendships.
  
- **Change in Behaviours:**
  - using extremist narratives and global ideology to explain personal disadvantage;
  - vocal support for terrorist attacks (either verbally or written);
  - sharing of views or trying to influence others with extremist ideology to extremism/extremist influences;
  - access to extremism/extremist influences;
  - possesses or is actively seeking to possess and/or distribute extremist literature/other media material likely to incite racial/religious hatred or acts of violence;
  - support for groups with links to extremist activity e.g. propaganda distribution, fundraising and attendance at meetings.

The Club is committed to the Prevent Duty; identifying those who may be at risk of being radicalised is part of this. Children and adults at risk who may be radicalised are not easily identifiable. As with managing other safeguarding risks, staff should be alert to changes in behaviour of a child or adult at risk that could indicate that they may be in need of help or protection. Any concerns of a child or adult being at risk demonstrated by behaviour on or off

the pitch, views posted online or concerns from family or friends should be referred to the Head of Safeguarding. Concern does not require any person to carry out any form of investigation but will ultimately be referred to the relevant professional body.

### **Signs and Indicators of Abuse**

Children and adults at risk may be reluctant to tell someone when they are being abused, so it is essential that every adult is aware of the possible signs and indicators that a child's or adult at risk's welfare or safety is being threatened. However, there is rarely a clear sign and you may often have to piece together various snippets of information and rely on your instincts that something does not seem quite right. Never allow a child's or adult at risk's disability or cultural difference to explain away concerns.

You may have one piece of information that when added to that of others, forms a clear picture of abuse. This is often compared to fitting pieces of a jigsaw together. Only when you have a few pieces can you start to see the true picture. Remember, it is not your job to decide whether or not a child or adult at risk is being abused - however it is your responsibility to share your concerns.

### **Poor Practice**

This is behaviour that falls short of abuse but is nevertheless unacceptable. It is essential that poor practice is challenged and reported even where there is a belief that the motives of the individual are well-meaning. Failure to challenge poor practice can lead to an environment where abuse is more likely to remain unnoticed. Incidents of poor practice occur when the needs of children and adults at risk are not afforded the necessary priority, compromising their welfare, e.g. allowing abusive or concerning practices to go unreported, placing children and adults at risk in potentially compromising and uncomfortable situations, failing to ensure the safety of children and adults at risk, ignoring health and safety guidelines, giving continued and unnecessary preferential treatment to individuals.

Examples of poor practice include: -

- unnecessarily spending excessive amounts of time alone with children or adults at risk away from others;
- being alone in changing rooms, toilet facilities or showers used by children and adults at risk;
- taking children or adults at risk alone on a car journey, however short;
- sharing a room with a child or adult at risk;
- engaging in rough or physical play, including horseplay; and
- reducing a child to tears as a form of control.

### **ADULTS AND ABUSE**

Club activities may include adults. In particular adults will be present at matchday events, other large scale events and some Community Trust activities. The Club's staff have a duty to refer any concerns they may have about an individual, group or an adult who works with adults who may be vulnerable or at risk of harm.

In the UK, the Care Act 2014 defines the types of abuse related specifically to safeguarding adults at risk, which includes the following:

- **Physical abuse** – including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.

- **Domestic violence** – any form of physical, sexual or emotional abuse (including psychological and/or financial abuse which takes place within the context of a close relationship, in most cases between partners (married, cohabiting or otherwise) or ex-partners. This also includes (i) so called 'honour'-based violence (including assault, imprisonment and murder where the person is being punished by their family or community for actually or allegedly undermining what the family or community believes is the correct code of behaviour and as a result "shaming" or "dishonouring" the family); and (ii) forced marriage – where one or both spouses do not (or, in the case of some adults at risk, cannot) consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual and/or emotional pressure.

Research shows that domestic violence has an effect on children. For example: -

- they may witness physical beatings and violence;
- they may attempt to protect the parent who is affected by the violence and may end up being abused themselves;
- they may be used as accessories in the abuse of the parent;
- a parent's ability to care for a child can be affected when the parent is the victim of domestic violence.

- **Sexual abuse** – including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

Indicators may include full or partial disclosure that sexual abuse is occurring or has occurred in the past, bruising to thighs or upper arms, bites on various parts of the body, significant change in sexual behaviour or outlook, a woman who lacks the capacity to consent to sexual intercourse becoming pregnant.

- **Psychological abuse** – including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyberbullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.

Indicators may include untypical ambivalence, deference, passivity, resignation, person appears to lack the opportunity to make choices or have adequate privacy, untypical changes in behaviour or routines of daily living, person appears isolated and deprived of social contact.

- **Financial or material abuse** – including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Indicators include general lack of money especially when benefits are claimed, person lacks belongings or services they can clearly afford, inadequately explained fall in living standards, inadequately explained withdrawals from bank accounts, inadequately explained inability to pay bills, person does not appear to possess items which are known to have been purchased, recent acquaintances expressing interest in the person or money, inadequately maintained financial systems when a person's money is being managed by others including a failure to produce receipts for major items, unexplained change in appointeeship or agent.

- **Modern slavery** – encompasses slavery, human trafficking, forced labour and domestic servitude. See the Anti-Slavery and Human Trafficking Policy for more information.
- **Discriminatory abuse** – including forms of harassment, slurs or similar treatment because of race, gender and gender identity, age, disability, sexual orientation or religion.
- **Organisational abuse** – including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home.
- **Neglect and acts of omission** – including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

Indicators may include person living in accommodation which falls below minimum practical standards, person has inadequate heating and/or lighting, failure to obtain health services when the person is ill, person does not appear to be taking the prescribed medication, callers/visitors refused access to the person.

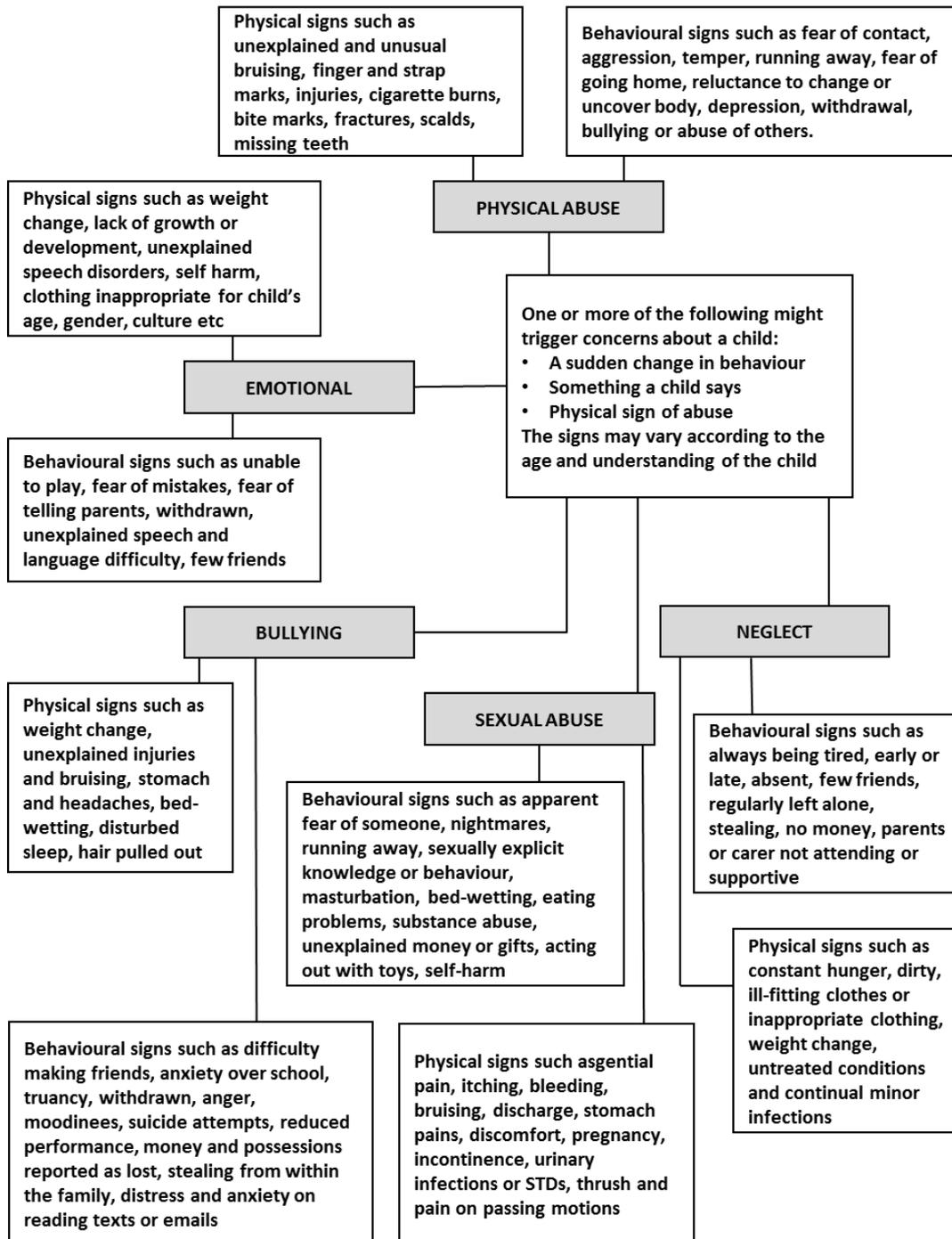
- **Self-neglect** – this covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.
- **Discriminatory behaviour** – unfair or less favourable treatment due to a person's ethnic origin, colour, race, nationality, religion or belief, gender, gender reassignment, sexual orientation or disability. This may include abuse, "banter", jokes, culturally insensitive comments and insults.

Further information is available from the Head of Safeguarding if required.

## POSSIBLE SIGNS OF ABUSE

The following diagram (The FA Child Protection and Best Practice) shows some possible signs of abuse. Some signs are explicit and specific to the type of abuse; others are much more general. However, you need to be careful as there may be another very plausible explanation, e.g. death in the family, a new baby, loss of pet, problems at school. These signs are also of general application to adults at risk in the context of settings/situations akin to adults. Some of the signs that are more specific to adults are included above.

**You should raise your concerns if there is a combination of unexplained changes over a period of time.**



**Support for Staff**

Dealing with safeguarding concerns can result in an impact on the emotions and well-being of staff involved. It is important that anyone affected seeks help if they feel that they need support.

If staff are in need of support, they should be encouraged to discuss this with their Line Manager, HR department or the Club's Safeguarding department.

**Media Protocols**

All media enquiries and communication with the Club from a safeguarding point of view should be directed to the Director of Communications and the Head of Safeguarding.

### Schedule 3

#### USEFUL TELEPHONE NUMBERS

Head of Safeguarding

Dale Bradshaw

**0116 222 8537**

**07739 852779**

Safeguarding and Welfare Officer

Sally Wan

**0116 291 5116**

**07511 900576**

Leicester City Children and Young People Services Department/Early Help

**0116 4541004**

Leicester City Adult Services

**0116 255 1606**

Leicester City Local Authority Designated Officer (LADO)

**0116 454 2440**

Leicester Safeguarding Childrens Board (LSCB)

**0116 454 6520**

Leicestershire Police

**0116 222 2222**

The Football Association (The FA)/NSPCC Child Protection Helpline

**0808 800 5000**

Forced Marriage Unit

**0207 008 0151**

Respond – Service for adults with Learning Disabilities

**0808 808 0700**

FA Premier League (Jess Addicott - Head of Safeguarding)

**07828 422170 or**

**0207 8649 000**

Prevent Team

**0116-2486726**

'First Step' Support for male survivors of sexual abuse

**0116 254 8535**

**Text relay 18001 0116 254 8535**

[www.ceop.gov.uk](http://www.ceop.gov.uk)

[www.thinkuknow.co.uk](http://www.thinkuknow.co.uk)

## Schedule 4

### LEICESTER CITY FOOTBALL CLUB SAFER RECRUITMENT AND DBS POLICY

#### Introduction and Rationale

This policy has been developed to embed safer recruitment practices and procedures throughout Leicester City Football Club ("the Club") and to support the creation of a safer culture by reinforcing the safeguarding and wellbeing of children and adults at risk that come into contact with the Club. This policy complements and builds on the Club's Safeguarding Policy and Procedures and ensures that the Club's recruitment and selection practices and procedures comply with recognised good practice in safer recruitment.

This policy is an essential element in developing and maintaining a safe and positive environment for all individuals and members of the community who come into contact with the Club and aims to ensure both safe and fair recruitment and selection of all staff by:

- attracting the best possible people to vacancies;
- deterring prospective people who are unsuitable from applying for vacancies. From the beginning of the recruitment process, it is important to send the right message that the Club has a rigorous recruitment process and does not tolerate any form of abuse. Wording in adverts and recruitment information must aim to deter potential abusers;
- identifying and rejecting those people who are unsuitable to work with children and adults at risk. It will not always be possible to deter potential abusers. Therefore, careful planning for the interview and selection stage, in terms of asking the right questions, setting appropriate tasks and obtaining the right information can assist in finding out who is suitable for the role and who is not;
- preventing and rejecting those people who are unsuitable to work with children and adults at risk. There are no guarantees that even the most robust safer recruitment process will prevent an inappropriate appointment. However, this does not mean it is too late to act. Ensuring that comprehensive induction processes are in place, together with appropriate policies and procedures, raising awareness through staff training and generally developing and maintaining a safe culture within the Club will all help to prevent abuse or identify potential abusers.

The intention of this policy is to ensure that all stages of the recruitment process, and beyond, contain measures to deter, identify, prevent and reject unsuitable people from gaining access to children and adults at risk who come into contact with the Club.

This policy covers all staff (whether employed or deployed directly by the Club or Club Community Organisation or through partnership working, commissioned services, consultancy or a third party capacity, paid or unpaid) and in particular:

- individuals who are in 'Regulated Activity' undertaking supervisory roles with children and adults at risk who require an Enhanced DBS with or without Barred List Check;
- individuals who may come into regular contact with children and adults at risk in their role whether or not they will be in a supervisory role who require either an Enhanced with or without Barred List Check or a Standard DBS check;
- individuals with access/opportunity for regular or occasional contact with children and adults at risk because of their role who require a Basic DBS Check.

The Club is responsible for continuing vigilance in relation to all staff. Any change of role will require a reassessment of DBS/vetting requirements and outcomes by the Head of Safeguarding or the Safeguarding and Welfare Officer.

## Recruitment Policies and Procedures

The LCFC Safer Recruitment Process is outlined in Appendix A of this policy. It demonstrates the Club's commitment to safeguarding in recruitment and selection and the embedding of safeguarding in the Club's recruitment and selection processes and procedures.

To fulfil the Club's commitment to safeguarding in recruitment and selection, the Club will, under the terms of this policy, the Club's recruitment and selection policies and procedures and in line with the LCFC Safer Recruitment Process:

- ensure all adverts for vacancies have a clear statement of the Club's commitment to safeguarding;
- ensure all roles have a job description which clearly defines the role and the extent of the duties to assist in identifying the appropriate level of DBS check, if any;
- ensure all roles have a person specification which sets out the qualifications, knowledge, skills, abilities and any requirement for a DBS check for the particular role;
- require the completion of a standardised Club application form for all vacancies;
- conduct an interview process which assesses the applicant's suitability for the particular role, their attitude towards children and adults at risk and their ability to perform the role. Recruitment and selection training is mandatory for all staff involved in the recruitment and selection process;
- in line with Premier League rules, obtain at least two written references for all posts with regular/occasional contact or influence over children and adults at risk. References will be followed up before a post is offered and one reference should be from the last employer or from an organisation which has knowledge of the applicant's work or volunteering with children and adults at risk;
- require the completion of a Self-Declaration Form as appropriate to the role which requires staff to disclose any convictions, cautions, reprimands or warnings as part of the recruitment process and imposes an ongoing obligation to disclose any that arise during the course of employment, in order that appropriate safeguards are put in place;
- ensure all relevant pre-employment checks are completed for prospective new starters including right to work checks, the validation of any essential qualifications, a DBS check for eligible roles and/or identity check, which should identify name, current address and date of birth;
- maintain a risk profile of posts that involve working with children and adults at risk and will therefore be subject to appropriate DBS checks for their role;
- ensure that, when a positive disclosure is received or issues are raised in the references and pre-employment checks, the appointment decision is made by the respective Department Manager in conjunction with the Head of Safeguarding or the Safeguarding and Welfare Officer after carrying out a risk assessment process (See DBS policy below);
- ensure that prospective employees do not commence working at the Club until full clearances of all relevant pre-employment checks have been received and verified. Any decision for employment with children and adults at risk to commence prior to receipt of full pre-employment checks can only be taken by the Head of Safeguarding or the Safeguarding and Welfare Officer in conjunction with the respective Department Manager;
- routinely renew DBS checks every three years for all roles that are eligible for a check;
- for relevant posts, ensure the completion of a declaration that a person is not disqualified under childcare disqualification requirements set out in the Childcare Act 2006 and the Childcare Disqualification Regulations 2009 as amended.

### **Safeguarding Induction**

Induction is an integral part of the recruitment process. Good recruitment and selection procedures help to ensure that the best person is appointed to the role, but it is equally important to induct him or her properly on commencement of their role.

The Club will ensure all staff working with children and adults at risk (whether employed or deployed directly by the Club or Club Community Organisation or through partnership working, commissioned services, consultancy or a third party capacity, paid or unpaid) complete a safeguarding induction delivered by the Club Head of Safeguarding or the Safeguarding and Welfare Officer which is specific to their role to ensure that they understand their responsibilities for safeguarding and how to report any concerns.

### **Volunteers**

Children and adults at risk will see volunteers within the Club in the same way as its other staff. They will not know that they are unpaid and will assume they are safe and trustworthy adults, just like anyone else within the Club environment. Therefore, volunteers should also be subject to the same checking processes to ensure that they are indeed safe to be in contact with children and adults at risk. It is important to ensure that volunteering does not allow an easier route into the Club for potentially unsuitable people.

Where a volunteer is likely to have an ongoing role that includes regular/occasional contact with children and adults at risk, then a similar recruitment and selection process will be applied as would be used to recruit an employee. The process may be presented in a less formal manner but the principles of safer recruitment are the same and this policy shall apply accordingly.

Where volunteers are recruited from another institution or organisation, written assurances must be obtained from the establishment concerned that the individual has been subject to a proper recruitment process that includes the necessary safeguards as is required for any other worker employed or deployed through partnership working or commissioned services (see below).

### **Partnership Working and Commissioned Services**

The Club takes its responsibilities for safer recruitment seriously. In order to ensure the safety and welfare of children and adults at risk, it is essential that partners and commissioned services also adopt robust recruitment and vetting procedures that minimise the risk of employing unsuitable people.

The Club will actively promote safeguarding within all partnership working and commissioned services involving children and adults at risk and will seek to establish minimum safeguarding standards by assessing the partner or external provider's suitability, ensuring that they have appropriate safeguarding policies and procedures in place and determining how any safeguarding concerns that may subsequently arise will be managed. In addition, partners and commissioned services will be required to provide written assurances about their recruitment and selection practices and, in particular, that workers deployed by them, where such individuals will be in Regulated Activity and/or have regular/occasional contact with children and adults at risk, have been subject to similar checks and safeguards as are in place for new employees and workers taken on directly by the Club as set out in this policy. Such considerations shall be made explicit in any contract or service level agreement with any partners or external providers. The Head of Safeguarding or the Safeguarding and Welfare Officer must draft/approve the safeguarding clauses of any contract or service level agreement.

Where the delivery by a partner or external provider involves working with those that are particularly vulnerable, additional considerations will need to be addressed to ensure that the contract or service level agreement ensures a thorough safeguarding risk assessment is

undertaken and sufficient protection for all staff and children and adults at risk is in place. Conversely where delivery by Club staff on behalf of/in conjunction with a partner or external provider involves working with those that are particularly vulnerable, the same considerations will need to be addressed to ensure that proper arrangements are made by our partners in the contract or service level agreement for the safety and welfare of our staff.

## **DBS POLICY**

### **General Principles**

As an organisation using the Disclosure and Barring Service (DBS) checking service through The FA to help assess the suitability of applicants for positions which meet the eligibility criteria for a DBS check, the Club complies fully with the code of practice regarding the correct handling, use, storage, retention and disposal of certificates and certificate information. It also complies fully with its obligations under the Data Protection Act 2018, General Data Protection Regulation and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of certificate information and has a written policy on these matters, which is available to those who wish to see it on request.

#### **1. Storage and Access**

Certificate information will be kept securely, in lockable, non-portable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties.

#### **2. Handling**

In accordance with section 124 of the Police Act 1997, certificate information is only passed to those who are authorised to receive it in the course of their duties. We maintain a record of all those to whom certificates or certificate information has been revealed and it is a criminal offence to pass this information to anyone who is not entitled to receive it.

Once the inspection has taken place, the certificate will be returned to the applicant and any certificate information will be destroyed in accordance with the code of practice.

#### **3. Usage**

Certificate information is only used for the specific purpose for which it was requested and with the full knowledge and agreement of the applicant.

#### **4. Retention**

Once a recruitment (or other relevant) decision has been made, we do not keep certificate information for any longer than is necessary. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints.

If, in very exceptional circumstances, it is considered necessary to keep certificate information for longer than six months, we will consult the DBS about this and will give full consideration to the data protection and human rights of the individual before doing so.

Throughout this time, the usual conditions regarding the safe storage and strictly controlled access will prevail.

#### **5. Disposal**

Once the retention period has elapsed, we will ensure that any DBS certificate information is immediately destroyed by secure means, for example by shredding, pulping or burning. While awaiting destruction, certificate information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack).

We will not keep any photocopy or other image of the certificate or any copy or representation of the contents of a certificate. However, notwithstanding the above, we may keep a record of the date of issue of a certificate, the name of the subject, the type of certificate requested, the position for which the certificate was requested, the unique reference number of the certificates and the details of the recruitment decision taken.

### **FA DBS Checks**

The Club conducts DBS checks for all eligible roles through The FA. FA DBS checks are preferred by the Club as there is an assessment of suitability in football by The FA in addition to the decision by the Club as employer for the particular role. In accordance with the Club's policies and procedures, all staff or anyone delivering any sessions on behalf of the Club who is eligible for a DBS check, is required to obtain an FA DBS through the Club which is accepted by The FA and approved by the Club Head of Safeguarding or the Safeguarding and Welfare Officer on behalf of the Club. The decision as to eligibility for a DBS will be made by the Head of Safeguarding or the Safeguarding and Welfare Officer. The only exceptions are set out below.

A previous FA DBS check dated within the last 12 months (or three years for football scouts who will usually have an enhanced check (with child barred list) in their grassroots football role) can be accepted by the Club unless there is a change of address after the date of the check or there is a positive disclosure. When accepting a previous FA DBS Certificate, the candidate's identity will be validated (name, address and date of birth) and a Club Self-Declaration Form will be required. If there is a change of address or there is a positive disclosure, a new DBS check through the Club will be required. The Head of Safeguarding or the Safeguarding and Welfare Officer will determine whether a previous FA DBS check can be accepted.

NOTE: If any delivery is one-off and there is no eligibility for a DBS check, adequate supervision will be required, in line with official guidance, which should be agreed by the Head of Safeguarding or the Safeguarding and Welfare Officer in advance of any delivery. This should not be used for a series of one-off's or to delay/avoid the DBS checking process.

### **DBS Checks by other National Governing Bodies (NGB)**

Where there is no contract or service level agreement and an independent coach is engaged to deliver any sessions on behalf of the Club, a DBS disclosure certificate dated within the last 12 months undertaken by another NGB may be accepted ONLY IF the delivery is for a sport other than football and the sport is covered by the NGB who carried out the previous DBS check.

When accepting a previous NGB DBS Certificate, the candidate's identity will be validated (name, address and date of birth) and a Club Self-Declaration Form will be required. If there is a change of address or there is a positive disclosure, a new DBS check through the Club will be required. The Head of Safeguarding or the Safeguarding and Welfare Officer will determine whether a previous NGB DBS check can be accepted.

### **DBS Checks by Other Organisations**

In the absence of a contract or service level agreement, all staff provided by other institutions or organisations will be subject to the Club's recruitment and selection processes including all DBS/vetting requirements in accordance with this policy. In these circumstances a DBS check carried out by other organisations will not be accepted by the Club.

Where there is an agreed contract or service level agreement between the Club and a partner organisation, setting out the DBS/vetting requirements and safeguarding obligations in accordance with this policy which have been drafted/approved by the Head of Safeguarding or the Safeguarding and Welfare Officer, a previous DBS certificate obtained through the partner organisation can be accepted in line with the arrangements under the contract or service level agreement. The Head of Safeguarding or the Safeguarding and Welfare Officer will determine whether a previous DBS check can be accepted.

Under the contract or service level agreement, the partner organisation will be required to provide the details of all approved DBS checks to the Head of Safeguarding or the Safeguarding and Welfare Officer including the level of check, the name of the issuing/registered body, the certificate date and certificate number and the identity will be

validated (name, address and date of birth) prior to any individual coming into contact with children or adults at risk.

### **Positive Disclosures and Risk Assessments**

The term "positive disclosure" refers to a disclosure containing information relating to convictions, cautions, reprimands and so on, plus "soft information" relating to non-convictions but which the police deem as relevant. Where there is a positive disclosure or issues are raised in the references and pre-employment checks concerning either job applicants or those employed directly by the Club or Club Community Organisation or deployed through partnership working or commissioned services, paid or unpaid, the risk assessment process in the Club's Safer Recruitment Procedure will be followed.

In accordance with the Safer Recruitment Procedure, the Head of Safeguarding and/or the Safeguarding and Welfare Officer shall gather information and complete a risk assessment in conjunction with the respective Department Manager and an employment decision will be made with appropriate safeguards in place or the offer of employment withdrawn.

To aid the decision-making process, it may be appropriate for the Head of Safeguarding or the Safeguarding and Welfare Officer to interview the applicant to verify the information received, prior to any judgements being made.

The assessment of the positive disclosure will be in accordance with the following checklist:

- the likely impact that the positive disclosure could have on the individual's ability to carry out the job role;
- the seriousness and nature of the offence(s)/information;
- the nature of the appointment;
- the length of time since the offence(s) occurred;
- the number and pattern of offence(s);
- the applicant's age at the time;
- any explanation of the circumstances of the offence(s)/information that may already have been given;
- concealment of the offence(s)/information at the application stage/non-disclosure of offence(s) that occurred during employment; and
- whether appropriate safeguards can be put in place.

Where appointment or continued employment of an individual with positive disclosures proceeds, the record of decision will be retained permanently on the individual's personnel file and the DBS disclosure information will be retained securely for up to six months from the decision being made, in accordance with the DBS Code of Practice.

The following details of all DBS and vetting checks will be maintained for all staff (whether employed or deployed directly by the Club or Club Community Organisation or through partnership working, commissioned services, consultancy or a third party capacity, paid or unpaid) on the Club's Single Central Record:

- the date of issue of a Disclosure;
- the certificate number of the Disclosure;
- the type of Disclosure requested and whether it included a Barred List Check;
- the position for which the Disclosure was requested; and
- the outcome of any risk assessment and when/who carried out the risk assessment.

### **Ongoing Vigilance and Commitment to Safeguarding**

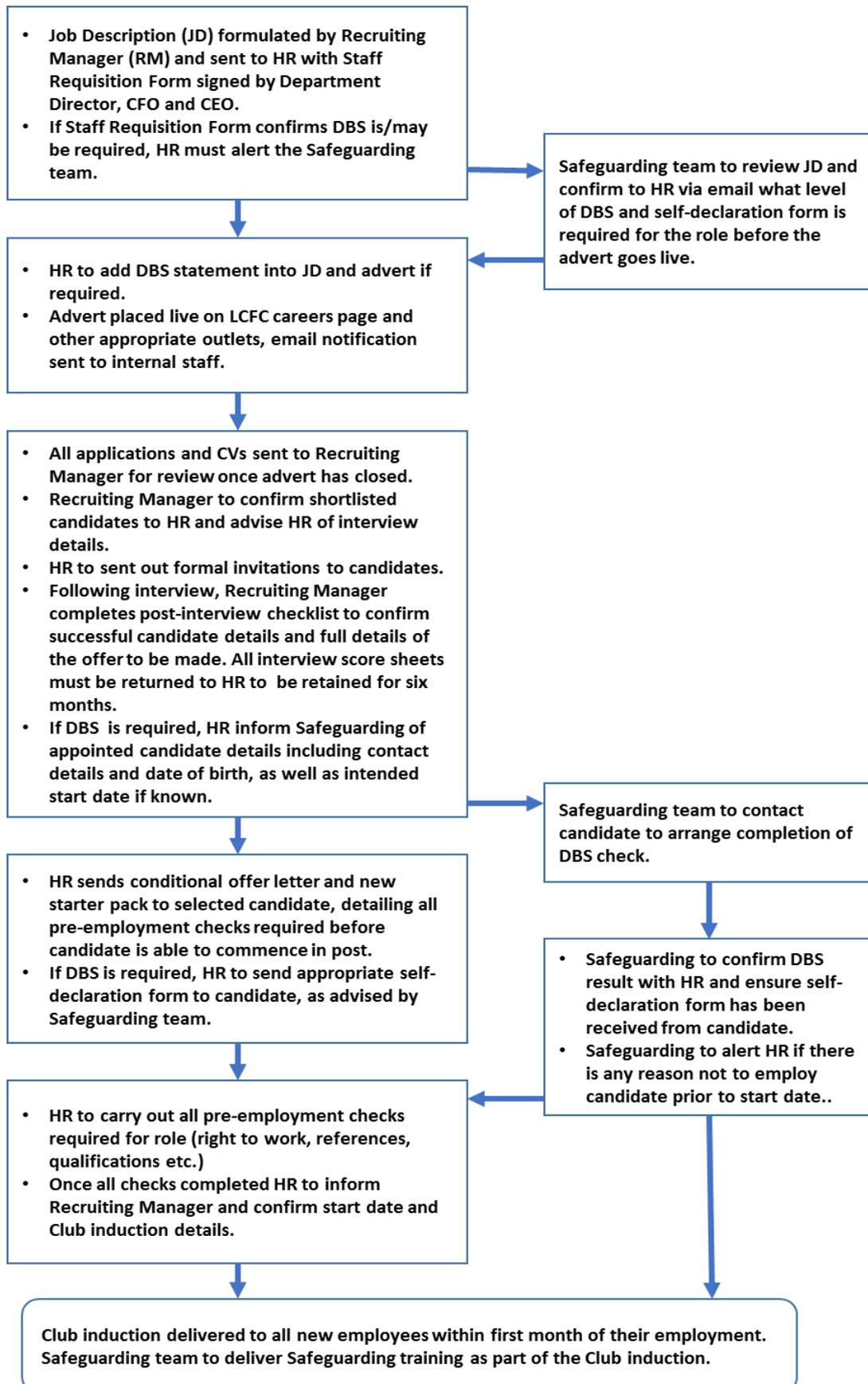
It is never sufficient to assume that a safer recruitment and selection process and robust induction arrangements are enough to ensure that children and adults at risk are safe and that there is no risk to them within the Club environment. Creation of a safe culture, with ongoing vigilance is essential.

The Club will continue to strive to create and maintain a safer culture by:

- having in place and putting into practice clear policies and procedures and ensuring that all employees and workers are aware of and understand them;
- setting acceptable standards of behaviour;
- having in place clear procedures for reporting concerns, ensuring that all staff know what the procedures are and their responsibility for following them;
- taking concerns seriously and providing support to individuals raising them;
- taking appropriate action in relation to concerns raised;
- having in place robust and appropriate induction arrangements;
- ensuring that all staff undertake safeguarding and other relevant training on a regular basis;
- keeping the commitment to safeguarding children and adults at risk on the agenda through regular discussion and cross departmental meetings with key staff with responsibilities for safeguarding, training sessions and so on;
- learning from experience; and
- never thinking that enough has been done to ensure a safe culture.

## Appendix A

## LCFC RECRUITMENT PROCESS





Policy Agreed	Date:	26 June 2017
Review of Policy	Name:	Caroline McGrory, General Counsel Dale Bradshaw, Head of Safeguarding Sally Wan, Safeguarding and Welfare Officer
Updated	Date:	May 2017 / July 2018 / September 2018
Issued to Local Authority	Date:	27 June 2018
Issued to Premier League	Date:	27 June 2018