



SAFEGUARDING POLICY
2019 | 20

FOUNDATION PRINCIPLES AND SAFEGUARDING MISSION STATEMENT

“Safeguarding is a set of proactive policies, practices and procedures, grounded in law, policy and values, that aims to keep children, young people and adults at risk safe from a wide range of potential harm.”

Dong Ren, Chief Executive Officer assumes overall responsibility and accountability for safeguarding at the highest level of the Club. The Board of Directors of Birmingham City Football Club (BCFC or Club hereafter) requires all representatives of the Club regardless of the terms of their attachment status to the Club must comply with these procedures. All external service providers to the Club will be required to demonstrate that their staff and workers meet the precise requirements needed for our own personnel if they are likely to have any contact with children.

BCFC Safeguarding Children Procedures have been designed to safeguard and protect children; based upon various legislation in place at the time and during the review. While these guidelines are created to protect children who are involved in the Club, they also apply to all children in any external community situation.

BCFC also recognize that Adults at Risk are also involved in activities within our Club at varied levels. These can be staff, service users or outside agencies. There exists a specific Adults at Risk Policy within the BCFC Safeguarding Policy which seeks to ensure appropriate safeguards are in place to minimize potential risk to these groups.

The greatest influence on safeguarding children is the Childrens' Act 1989. This is a significant and detailed Act that indicates how all children in all communities in England, Wales and Northern Ireland will be protected against harm of any sort; whether it is actual or likely and to promote the welfare of developmental needs of children.

The Children Act 1989 was defined by royal assent; overviewed and revised in 2002, 2003, 2004-05 and is constantly reviewed and revised in line with the wellbeing of children. It is wholly adopted by the Board of BCFC and it is expected that all personnel associated with the Club and any of its satellite activities will adhere to. The needs of the child are paramount.

Other legislation that has influenced these procedures are:

- European Convention of Human Rights 1998
- DATA protection Act 1988
- Birmingham Children's safeguarding Board recently rebranded as Birmingham M.A.S.H (Birmingham Multi Agency Safeguarding Hub)
- Local Authority Designated Office L.A.D.O
- The Children's Act 1989 inclusive of amendments in 2002-03, 2004-05 and 2006
- Premier League and English Football League guidelines and regulations inclusive of updates
- National Coaching Foundations Code of Ethics and Conduct for Sports Coaches
- Rehabilitation of Offenders Act 1974
- Sex Offender Acts 1997, 2001, 2003 and 2007
- FA Ground Regulations and other Health and Safety at Work Act 1974 inclusive of amendments 1994 for sport and 2002
- Police Act 1975
- Criminal Justice and Court Services Act 2003
- Safeguarding Vulnerable Groups Act 2006
- Equality Act 2006-and 2010

A child or children refers to anyone under the age of 18, The board would also like to underline the particular vulnerability of children with disabilities and will strive to ensure awareness of this is core to all training undertaken.

The Board equally accept that other people over the age of 18 use the Club's facilities. Some individuals may have additional needs which may make them subject to safeguarding procedures, as their personal circumstances and susceptibility may make them subject to harm or abuse.

The Safeguarding Adults at Risk Policy is currently still included within the BCFC Safeguarding Policy. The view is to separate this in the near future.

Underpinning these safeguarding procedures is also promoting equality and diversity, as promoted by the FA and demonstrated within the “Kick it Out” training recently ran at the Stadium during autumn 2014. Therefore, the safeguarding procedures running alongside the equality and diversity ethos, protect all children and adults at risk, irrespective of their gender, ethnicity, cultural diversity, sexual orientation, religion or disability.

The aim of the Board is to ensure standards of good safeguarding practice exist, across the spectrum of activities associated with the Club to ensure the minimization of risk to children and adults at risk.

The Board will support any individual who acts in good faith under these procedures against any other person whose alleged behaviour led to concerns being raised. This includes any allegation against a colleague, manager or Board member.

Should allegations of a Child Protection nature be made against the Wes Hughes- Safeguarding Services Manager, direct confidential contact with Michelle Daly- Head of Human Resources must be made immediately. The concerns will then be passed on to the relevant child protection agencies, should the agencies deem that the concerns meet the threshold for referral.

IF ANY INDIVIDUAL RAISING CHILD PROTECTION CONCERNS DOES NOT HAVE THE FAITH OR CONFIDENCE TO BELIEVE THAT THE MATTER WILL BE MANAGED APPROPRIATELY BY THE CLUB'S OFFICERS AND THEY HOLD GENUINE AND SERIOUS CONCERN ABOUT A CHILD'S WELL-BEING OR SAFETY, THEN DIRECT CONTACT WITH THE LOCAL AUTHORITY AND OR THE POLICE MUST BE MADE.

SAFEGUARDING SERVICES MANAGER ROLE AND RESPONSIBILITIES

In appointing a Safeguarding Services Manager the Directors acknowledge the expertise, experience and qualifications the post holder has in respect of Child Protection matters. Therefore, the Board fully support and endorse the post holder in any decision made or advice given, regarding practices, as they relate to under 18's and adults at risk for all activities undertaken at Birmingham City Football Club.

Any representation or complaint relating to any Child Protection matter, incident or decision made by the Safeguarding Services Manager must be made in person to Michelle Daly- Head of Human Resources and be accompanied with a written report regarding the incident or matter in question. Any documentation from witnesses of the concern is to accompany the primary complainants statement in this representation. The representation is required to be made within 24 hours of the matter, any necessary further action will be carried out immediately.

The primary role of the Safeguarding Services Manager is to create and maintain working Safeguarding Children Procedures that will blend with the Club's functions as they relate to children less than 18 years of age and adults at risk. The Safeguarding Services Manager will need to ensure the Club's procedures dovetail all national requirements from any of the lead governing bodies.

The Safeguarding Services Manager's ongoing role will then be to advise and guide any member of staff on any matter relating to under 18 year olds and adults at risk. This includes all commercial events targeted towards young people, the involvement of children in the Club's merchandising and advertising activities, and specific individual child involvement in any capacity i.e. mascots, scholars, junior blues, ball retrievers etc.

The Safeguarding Services Manager will take lead responsibility in any investigation into situations that relate to any child's wellbeing, whether Child Protection or general in nature. This will include consulting with external protection agencies, attending any meeting to

discuss those concerns, or any court related matter. In order to assist the Club in this role, the Safeguarding Services Manager will also identify other staff members to support the daily delivery of these procedures and best practice. They will be known as Safeguarding Officers, who will take all guidance and advice on the safeguarding of children from the Safeguarding Services Manager. All concerns must be directed to the Safeguarding Services Manager by other Safeguarding Officers.

The Safeguarding Services Manager will also participate in any disciplinary action the Club has to process as a consequence of a child related concern. This will include internal investigations, interview and hearing.

Whilst engaged by and answerable to the Board of Directors of the Club, the moral and ethical duty of the Safeguarding Services Manager is to the child/children involved in any activity, at any site run under the ethos of the Club. Therefore, the Safeguarding Services Manager will not be restricted by the Board if the obligation of safeguarding needs to be met using organisations outside of the Club's arena, such as the Local Authority or the English Football League, for example.

The Safeguarding Services Manager is available for guidance and advice on Child Protection matters should any person engaged by the Club, in any capacity, have concerns for a child or children inside and outside the Football arena.

THE BOARD OF DIRECTORS UNDERTAKING

1. The Board of Directors of Birmingham City Football Club (hereafter referred to as The Club or BCFC) are committed to providing a safe and secure environment in which children of all ages and all backgrounds can enjoy and participate in any activity associated with the Club, at any site or venue where that activity is being held.
2. In order to achieve this primary goal the Board of the Club has appointed a Safeguarding Services Manager to assist and guide them in this task.
3. The Club expects the Safeguarding Services Manager to take personal responsibility for all Child Protection matters associated with the Club, regardless of the geographical location of the activity undertaken, as well as to assist with any disciplinary issues the Club may have to deal with. The Safeguarding Services Manager will have unlimited access to all areas of the ground, academy or venue where a Club activity or event is being held at all times.
4. The Club expects the Safeguarding Service Manager to identify ways in which all officers can actively strive to minimise the potential for situations where abuse may occur. This expectation will extend to approving certain individuals in key positions across the Clubs activities to become Children's officers to support this task.
5. The Safeguarding Services Manager will create and maintain Safeguarding Children Procedures that will be endorsed by the Club and all personnel will be required to comply with them. Failure to comply, co-operate or assist with the Safeguarding Children Procedures or Safeguarding Services Manager will result in notification to the Board for consideration under the disciplinary procedures for failure to adhere to Company procedures.
6. The Board of Directors undertake to have the Safeguarding Children Procedures reviewed every two years, but expect the Safeguarding Services Manager to update them via additional guidance as and when it becomes necessary to do so.
7. The Club will create a complaints and representation process, over and above the Clubs Grievance Procedure. This is for anyone or their designated representative using the facilities of the Club who has been the subject of a Child Protection referral to protection agencies and feels they have been unfairly treated.
8. The Club shall ensure that the Safeguarding Services Manager will verify that any Child Protection training endorsed by the Club and delivered to its employees, volunteers and others associated with the Club's function is suitably and appropriately tailored to reflect the roles and responsibilities expected of them.
9. The Club fully accepts that a significant part of Child Protection lies within robust and safe recruitment and selection procedures. To this end, the Club has already instituted the recommendations relating to DBS checks and the need for all those who directly have contact with children to complete the DBS check and sign up for the update service. This means the individual's DBS will be renewed every year, which is more efficient than the gap of years that were between the old CRB service.
10. The Safeguarding Services Manager, in conjunction with the Head of Football Administration, Human Resources and the Chief Coordinating Officer, will form a Disclosure Panel to investigate information disclosed on self-declarations/DBS that exceed the guidelines for appointment and any DBS check which has recorded any conviction, caution or involvement in Safeguarding related matters, or matters which may make someone unsuitable for a particular post.
11. The Disclosure Panel will decide whether a person is suitable to fulfill the duties of any post applied for, irrespective of the terms of the engagement.
12. Any individual deemed by the Disclosure Panel not to be suitable for association with the Club, will have the right to appeal direct to the Board of the Club. The individual will give, in writing, full and detailed evidence as to why the decision is unfair. The DBS Disclosure Panel will equally be requested to submit a written report explaining their decision and a copy of the said report would be made available to the complainant.
13. The Club will ensure that all procedures, policy and documentation created or used to promote and protect children, will be in plain English. Additionally, if any person requires large print or other specific versions created, the Club will fund this as part of equality procedures.
14. The Club will annually review the position of the Safeguarding Services Manager based on the performance and effectiveness of the previous year's activities.

SECTION TWO

- INTRODUCTION & DESIGNATED SAFEGUARDING PERSONS
- WORKING GUIDELINES
- PREVENT STRATEGY
- AWARENESS OF ABUSE
- CONCERNS
- MAIN FORMS OF ABUSE?
- WHAT ARE THE INDICATORS OF ABUSE?
- WHAT HAPPENS NEXT?
- ANTI-BULLYING POLICY

INTRODUCTION

Hearing about abuse is physically and emotionally distressing and takes its toll therefore we need to remind you that our Designated Safeguarding Officers are here to support you too. If you have been affected by being involved in an allegation of abuse you can speak to any of these Officers, any contact with them is confidential and will not automatically be divulged to the Club or your line manager. Confidentiality will only be breached if it is thought that doing so will protect you or someone else.

Wes Hughes, our Safeguarding Services Manager can be contacted anytime.

Or in his absence, either Designated Safeguarding Officer listed below:

BIRMINGHAM CITY FC – SAFEGUARDING SERVICES MANAGER WES HUGHES	E: WES.HUGHES@BCFC.COM	M: 07843 419 222
BIRMINGHAM CITY FC – HEAD OF EDUCATION & WELFARE - DSO MARK SINCLAIR	E: MARK.SINCLAIR@BCFC.COM	M: 07500 822 981
BIRMINGHAM CITY FC – HUMAN RESOURCES OFFICER - DSO ADELE BARRON	E: ADELE.BARRON@BCFC.COM	M: 07429 461 609
BIRMINGHAM CITY FC – CHIEF OPERATING OFFICER - DSO LUNGI MACEBO	E: LUNGI.MACEBO@BCFC.COM	M: 07962 144 755
BIRMINGHAM CITY FC- COMMUNITY TRUST FOOTBALL IN THE COMMUNITY MANAGER- DSO CRAIG GILL	E: CRAIG.GILL@BCFC.COM	M: 07754 092 530
BIRMINGHAM CITY FC – COMMUNITY TRUST SENIOR SPORTS LECTURER - DSO PAUL VIRGO	E: PAUL.VIRGO@BCFC.COM	T: 0121 722 0101
BIRMINGHAM CITY FC – HEAD OF COMMUNITY TRUST- DSO ANTONY ISHERWOOD	E: ANTONY.ISHERWOOD@BCFC.COM	M: 07931 908 314
BIRMINGHAM CITY FC – WOMEN'S TEAM GENERAL MANAGER- DSO HEATHER COWAN	E: HEATHER.COWAN@BCFC.COM	M: 07811 123 517
BIRMINGHAM CITY FC – REGIONAL TALENT CLUB MANAGER - DSO CHRIS GOULD	E: CHRIS.GOULD@BCFC.COM	M: 07730 270 584





WORKING GUIDELINES

This summary must be read in conjunction with the Child Protection Procedures, which are available to all staff through their Line Manager/ Heads of Department. All BCFC staff will have the opportunity to discuss safeguarding within their induction with Human Resources personell. The Child Protection Procedures are included within the Safeguarding Policy and can be discussed with the Safeguarding Services Manager if further clarity is required.

As a representative of BCFC you are required to take specific action if you become aware of concerns regarding the wellbeing or safety of a child or children involved with the Club. Within football, effective Child Protection is only possible through a team effort and you are part of the team. We are depending on you to do your part.

The procedures and guidelines apply to all children who are associated with the Club in any capacity, inclusive of match day attendees, visitors to the ground, shop or other facilities, academy members as well as those involved in Football in the Community.

You will need to familiarize yourself with the expectations the Club has of you in your particular role and use the Child Protection training you will be given as an opportunity to ask questions and reassure yourself that together we can make BCFC a safe place for young people.

The Child Protection Procedures and this synopsis are fully endorsed and supported by the Board of Directors of the Club and you must follow these guidelines.

If you have any level of concern or want to talk about a worry you have about a child's safety or wellbeing, you must share it with the Safeguarding Services Manager.

The Club require anyone who reports a concern to fill in a 'Incident Report Form', please see below.

INCIDENT REPORT FORM

We ask all our staff to record any suggestions for improvement, complaints received, issues, or incidents you encounter at any time whilst working for the Club. This process will enable the Club to identify areas for improvement with a view to providing excellent customer service and developing areas of good practice. Examples of [but not limited to] such issues you may need to report are: suggestions to increase the quality of the customer experience, broken/leaky equipment; car park complaints; customer disagreements; issues with other staff/co-workers; any discriminatory comments or treatment; and positive feedback.

If however, you are reporting anything to do with Health & Safety, Accidents or Theft, these MUST be reported immediately to Dave Hoult, Safety Officer on 07584 311 558. Similarly, any Safeguarding concerns MUST be reported immediately to Wes Hughes, Safeguarding Services Manager on 07843 419 222 or internally on extension 275.

This Incident Report Form must be completed within 12 hours of the incident and deposited into the nearest "Reporting Box". All forms will be collected by HR only on a weekly basis. Please complete all sections except Section B. If you need any help completing the form please contact HR on 0121-202 5280.

Section A:						
Incident/issue number Date:		Incident/issue number Time:				
Game or event:	[e.g. BCFC v]	Location of incident:	[Location e.g. stand, room, area]			
Type of incident/issue	CONCERN	COMPLAINT	PROPERTY DAMAGE	SUGGESTION	OTHER (Please give further details below)	
Tell us what happened or what you are concerned about?						
Has this been reported to a manager and/or supervisor?	Yes	No	On which date & time was this reported?			
Name & title of who this was reported to:	CONCERN		Have they taken any further action following this to your knowledge?	Yes	No	Don't know

Thank you for letting us know about this suggestion/issue/incident/complaint. As the eyes and ears of the Club, your assistance is of vital importance to continue providing the best service and working environment we can. Therefore, please fill in the details below so that we may be able to contact you for further details. Please be assured that your comments will be treated with the strictest confidence.

Your Details:				
Report completed by [print name]:		Position held:		
Department/Area:		Date:		
Phone number:		Email:		
Your Signature:		May we contact you if we require further details?	Yes	No

All contact will be confidential and you will be fully supported by the Club if any action is needed to safeguard a child's wellbeing.

PREVENT STRATEGY

Prevent is part of the Government counter-terrorism strategy. It's designed to tackle the problem of terrorism at its roots, preventing people from supporting terrorism or becoming terrorists themselves.

Prevent operates in the 'pre-criminal space'. It is about supporting individuals who are at risk of radicalisation away from becoming terrorists, or supporting terrorism. It is not about any ideology - it covers all forms of extremism.

Prevent is about:

NOTICING - vulnerability to radicalisation, changes in behaviour, ideology, and other signs of extremist exploitation.

CHECKING - your concerns with the Safeguarding Services Manager (Wes Hughes) to offer support and help determine a proportionate response.

SHARING - your concerns, where appropriate, with partner agencies and as far as possible being open and honest with the individual around your duty to share concerns.

Support for the individual may be provided via the Channel process.

"Channel is a multi-agency partnership that evaluates referrals of individuals at risk of being drawn into terrorism, working alongside safeguarding partnerships and crime reduction panels." (Prevent Strategy, Home Office, 2011)

If you are concerned that someone you know is at risk of radicalisation please contact the Safeguarding Services Manager, who is the lead for Prevent at Birmingham City Football Club.

MAKING A REFERRAL TO CHANNEL:

Please email your completed Channel Referral Form to the Safeguarding Services Manager at wes.hughes@bfc.com

WHAT SHOULD YOU INCLUDE IN YOUR REFERRAL?

The Channel panel will want to consider how to assess risk, and offer support in three key areas:

Engagement - Is there any information to indicate that this individual is showing any signs of becoming involved with a group, cause or ideology that justifies the use of violence and other illegal conduct in pursuit of its objectives?

Intent - Is there any information supporting that this individual has indicated that they may be willing to use violence or other illegal means?

Capability - Is there any information supporting what this individual may be capable of doing?

TRAINING

Training will be delivered to all staff, with the process being that:

- Heads of Department will undertake in-service training delivered by the Safeguarding Services Manager
- Heads of Department will then undertake the ETF Prevent for Practitioners qualification.
- Upon completion, Human Resources will then coordinate with Heads of Department to facilitate the delivery of training to all members of staff in their department.
- Following training, all members of staff to complete the Prevent for Practitioners qualification and forward a copy of the certificate to Human Resources.
- Annual CPD refreshers will be organised by the Safeguarding Services Manager to advise on new information and reinforce key topics of the strategy.

AWARENESS OF POSSIBLE ABUSE

Individual factors or indicators of abuse may not be particularly worrying in isolation, but in combination they may suggest that there is serious cause for concern. You should be alert to the indicators brought to your attention in this document. If you consider that you and or the child or an adult at risk is in immediate and direct danger, then you should raise your concerns with the police straight away. In this circumstance once safety is ensured you must contact the Safeguarding Service Manager Wes Hughes. In all other situations you must contact one of the designated safeguarding persons listed on page 7, if Wes Hughes is unavailable.

CONCERNS

There may be many reasons why you are concerned, in very few circumstances it will be because a child or other adult has told you directly that abuse is occurring. You will need to understand and appreciate that, to a child, you are a significant person, someone who can be trusted and you must handle the information you are given carefully. **DO NOT** put words into the child mouth or mind, the less you say the better, using an ok at intervals to show you are listening, listening and paying attention to how the child is presenting themselves by their body language is the most important thing you can do for that child, if a child is disclosing an incident/s to you.

Remember at all times it is the responsibility of the Protection Agencies to investigate allegations of child abuse, NOT you and not the Club. How you respond in that initial period will seriously affect the way the concerns can be dealt with (see above). It is essential therefore, that if a child starts to talk to you about something that is troubling them that you **DO NOT** ask them any questions, do not suggest names or people that have done things to them and most importantly you must contact one of the Children's Safeguarding Officers immediately.

Equally the setting in which the discussion takes place is important, try to keep the discussion private and out of earshot of others but do not take the child into a room alone. This may be difficult as the child would have had to find the courage to disclose to you and just wants to get it out, so may be unaware of the wider surroundings. You must record, in writing, exactly what was said to you using the language used and not your interpretation. But most important you must pass it on and share it with those who can investigate it properly.

Be aware of the child's general behavior, their interaction with peers and adults and if they have bruises or other injuries it is ok to say "that looks sore what happened?", that is a direct question not a leading one which may completely ruin a case and put a child at further risk. Record the response and be aware of how often a particular child is bruised, it could be a bruise or it could be bullying, which is a form of abuse, we need to deal with both.

MAIN FORMS OF ABUSE

CSE

It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.

BULLYING INCLUDING CYBER BULLYING

Bullying may not stand alone it may have many aspects to it inclusive of emotional and physical abuse. Bullying should be seen as a very serious form of abuse and is on the increase between children and/or from an adults/s. Bullying takes many forms and all allegations and instances must be reported so that action can be taken and strategies put in place to help the child/children and Adults at Risk recover and the perpetrator to change their behavior via education and rehabilitation. The increase in use of social networking sites and other cyber related communications systems are highlighting another area of bullying rapidly on the increase. According to the Birmingham Safeguarding Board 2014 boys are increasingly exploited via games consoles while online, whilst girls are open to the same high degree of exploitation via social networking sites such as Facebook, Instagram and snap chat for example. Regardless of ethnicity, age, gender or economic difference.

NEGLECT

Where adults charged with the care and control of a child or children fail to meet their basic needs like providing food and warm clothing, love and affection, supervision or attention. In sport neglect includes exposing them to undue cold or unnecessary risk of injury.

PHYSICAL

Where adults and other children deliberately physically hurt child/children or adults at risk by hitting, squeezing, shaking, burning or biting them for example. This would include giving them alcohol, non-prescribed medicines, illegal drugs and poisons. In sport this would include inappropriate training – intensity or frequency that is not proportionate to the child’s age or physical development, or the use of drugs to enhance performance.

SEXUAL

Where adults use a child or children to gratify their own sexual needs. This includes all types of sexual acts from external fondling to full intercourse. It also includes showing children sexually explicit material – pornographic or adult material. In sport the most common manifestation is the misuse of coaching techniques, which permit touching of a child’s body, so that it is done in an indecent manner.

EMOTIONAL

Where adults and other children constantly shout, ridicule, threaten bully or taunt/tease a child/children or adult at risk causing them to be withdrawn and lacking in confidence, alongside effects showing in damage to their emotional wellbeing. It also covers the persistent lack of love and affection, as well as the over protective control that prevents a child from developing socially. Within all form of abuse there will be a component of emotional abuse. In sport constant criticism, name calling, sarcasm, bullying and unrealistic pressure to perform or excel are all common factors.

DRUG ABUSE

This is the habitual or compulsive use of legal and or illegal substances which can lead to addiction. This may lead to serious psychological, physical and general well-being issues. It is important that staff are trained in the recognising potential indicators of abuse, as early intervention can often assist in the safeguarding of children and adults at risk.

FABRICATED OR INDUCED ILLNESS

Fabricated or induced illness (FI) is a rare form of child abuse. It occurs when a parent or carer, usually the child’s biological mother (90%), exaggerates or deliberately causes symptoms of illness in the child. However, it must be mentioned that other parents, guardians and healthcare professionals have been responsible in some cases.

(FI) is also known as “Munchausen’s syndrome by proxy” (not to be confused with Munchausen’s syndrome, where a person pretends to be ill or causes illness or injury to themselves).

FAITH ABUSE

Standard child safeguarding procedures apply in all cases where abuse or neglect is suspected, including those that may be related to particular belief systems.

The number of cases of child abuse linked to faith or belief in spirits, possession and witchcraft is believed to be small, but where it occurs it causes much distress and suffering to the child. It is likely that a proportion of this type of abuse remains unreported.

Abuse linked to faith or belief may involve a wider context, where the child is treated as a scapegoat in circumstances of family stress, deprivation, domestic violence, substance abuse and mental health problems.

FORCED MARRIAGE

There is a clear difference between a forced marriage and an arranged marriage. In arranged marriages, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the young people.

In a forced marriage, one or both spouses do not consent to the arrangement of the marriage and some elements of duress are involved.

Duress can include physical, psychological, financial, sexual and emotional pressure. Forced Marriage is an abuse of human rights and, where a child is involved, an abuse of the rights of the child.

GANG AND YOUTH VIOLENCE

The vast majority of young people and education establishments will not be affected by serious violence or gangs. However, where these problems do occur there will almost certainly be a significant impact.

FEMALE GENITAL MUTILATION

The Female Genital Mutilation Act 2003 replaced the 1985 Act and made it an offence for the first time for UK nationals, permanent or habitual UK residents to carry out FGM abroad, or to aid, abet, counsel or procure the carrying out of FGM abroad, even in countries where the practice is legal.

We have a mandatory duty to report to the police if we believe FGM has occurred. The duty to report applies where the relevant professional observes physical signs on the girl which appear to show that an act of FGM has been carried out on her, and the relevant professional has no reason to believe that the act was part of a permitted surgical operation; or where the girl informs the relevant professional that an act of FGM has been carried out on her. It is for the police, upon receipt of a report, to investigate the circumstances and to conduct enquiries into any alleged offence.

GENDER BASED VIOLENCE

The terms of ‘gender based violence’ and ‘violence against women’ are often used interchangeably, as most violence against women is gender-based, and most gender based violence is inflicted by men on women and girls.

It is important to note that gender based violence also includes violence perpetrated against men and boys. For instance, boys may become subjected to sexual abuse by family members or trafficked for the purpose of sexual exploitation.

RADICALISATION

This is the action or process of causing someone to adopt radical positions on political or social issues. The Club have adopted Government guidance in relation to the Prevent Strategy and have a clear process which enables staff and young people to access an online course to enhance their understanding of related issues. The guidance and supporting web-links are included within the Safeguarding Policy ‘Section 5’.

SEXTING

The club are aware of the increased use of devices worldwide in order to exchange sexual images of children. Whether consensual or by use of coercion and abuse, staff must consider the welfare of young persons and seek guidance from the Head of safeguarding or academy safeguarding officer immediately. Training and awareness of this sensitive issue shall form part of staff inductions, player and parent inductions and across all aspects of the club.

DOMESTIC VIOLENCE

Domestic Violence is an important indication of risk of harm to children. Children may suffer directly and indirectly if they live in households where there is domestic violence. Domestic violence is likely to have a damaging effect on the health and development of children. A child in a situation of Domestic Violence should be regarded as a “Child in Need”.

HONOUR BASED VIOLENCE

There are a number of considerations to be taken into account when dealing with abuse within families. The impact upon all children within the household and the risk to them must be assessed accordingly. Should you suspect that this form of abuse is taking place, it is strongly advised that you pass your concerns on to the SSM or DSO immediately.

Failure to act upon, report or refer concerns to the Safeguarding Services Manager, other statutory agency or member of management at Birmingham City FC may be regarded as gross misconduct.

POTENTIAL INDICATORS OF ABUSE?

There is no complete or absolute list to cover all indicators of abuse and not all indicators of abuse known will apply to all children suffering abuse.

That's what makes detection, prevention and recovery from abuse so difficult. However, some or all of the following could be a trigger for the protection agencies to investigate a child's situation further. Don't think of this as a checklist to complete before passing on concerns.

- Unexplained or suspicious injuries such as bruising, cuts or burns particularly if situated on a part of the body not normally prone to such injuries
- An injury for which the explanation seems inconsistent
- The child describes what appears to be an abusive act involving him/her
- Someone else, which can be child or adult. Expresses concern about the welfare of a child
- Unexplained changes in behavior such as becoming withdrawn or displaying sudden outbursts of temper
- Inappropriate and/or advanced sexual awareness
- Engaging in sexually explicit behavior
- Distrust of adults especially those with whom a close relationship would normally be expected
- Has difficulty in making friends
- Is prevented from socializing with other children
- Displays variations in eating patterns; inclusive of overeating or loss of appetite
- Loses weight for no apparent reason
- Becomes dirty or unkempt

BIRMINGHAM CITY FOOTBALL CLUB ANTI-BULLYING POLICY



Season 2018/19

1. Statement

Birmingham City Football Club is committed to providing a caring, friendly and safe environment for all players so that they can participate in football in a relaxed and secure atmosphere.

Bullying of any kind is unacceptable and is regarded in football as a type of abuse. If bullying does occur, players or their parents should be able to recognise this and know that incidents will be dealt with promptly and effectively. All incidents will be approached with equal thoroughness and consistency.

Birmingham City FC expects that anyone who knows that bullying is happening should report it to the Designated Safeguarding Officer or other appropriate member of staff, who will then in turn report it to the Designated Safeguarding Officer.

2. What is bullying?

- Bullying is the use of aggression with the intention of hurting another person.
- Bullying results in pain and distress to the victim.
- Bullying is unprovoked and repetitive.
- Bullying may be carried out by one person or by a group and gives the bully or bullies a perceived position of power.

Bullying can be any of the following:

Emotional:

Includes but is not limited to, being unfriendly, emotional or physical exclusion, sending hurtful text messages or messages on a social network such as Facebook, Instagram or Twitter, and tormenting (hiding property or making threatening gestures, for example).

Physical:

Includes but is not limited to pushing, kicking, hitting, punching, or any other use of violence.

Verbal:

Includes but is not limited to name-calling, spreading rumours, sarcasm or teasing.

Racist:

Bullying because of, or focussing on the issue of race.

Sexual:

Includes but is not limited to unwanted physical contact or sexually abusive comments.

Homophobic:

Bullying because of, or focussing on, the issue of sexuality. Victims of bullying may be smaller/weaker than their peers, larger than their peers, lacking in confidence, hardworking, or not conform to the group 'norm'.

Bullying will not be tolerated at this football club, and any person(s) found guilty of such behaviour will be subject to severe disciplinary action

3. Why is it important to respond to bullying?

Bullying hurts and no one deserves to be a victim of bullying. Everybody has the right to be treated with respect. Individuals who are bullying need to learn different ways of behaving. The impact upon a child or young person can be devastating and in some cases affect all aspects of their life. In extreme circumstances it can lead to suicide threats or even attempts.

Birmingham City Football Club has a responsibility to respond promptly and effectively to issues of bullying.

4. Objectives of this policy:

- Bullying will not be tolerated
- Players have the right to feel safe

- Every player is responsible for their own behaviour and expected to treat everyone with respect.
- All players, parents/carers, staff and volunteers should have an understanding of what bullying is.
- All players, parents/carers, staff and volunteers should know what Birmingham City Football Club's policy is on bullying and follow it when bullying is reported.
- Birmingham City Football Club takes bullying very seriously. Players and their parents/carers should be assured that they will be supported when bullying is reported.

5. Signs and indicators:

A person may indicate by signs or behaviours that he or she is being bullied. Parents/carers, staff and volunteers should be aware of these possible signs and that they should investigate if a child:

- Says they are being bullied
- Is unwilling to go to sessions
- Becomes withdrawn, anxious or lacks confidence
- Feels ill before training sessions
- Comes home with clothes torn or training equipment damaged
- Has possessions go missing
- Asks for money or starts stealing money (to pay the bully)
- Has unexplained cuts or bruises
- Is frightened to say what's wrong
- Gives improbable excuses for any of the above
- In more extreme cases:
- Starts stammering
- Cries themselves to sleep at night or has nightmares
- Becomes aggressive, disruptive or unreasonable
- Bullies other children or siblings
- Stops eating
- Attempts or threatens suicide or runs away

These signs and behaviours may indicate other problems, but bullying should be considered a possibility and should be investigated.

6. Procedures:

1. Report bullying incidents to the Designated Safeguarding Officer or to any member of staff, who will in turn report it to the Designated Safeguarding Officer.
2. The victim will be reassured that their allegation will be taken seriously and that action will and is being taken. Victims are told not to bully back, to say 'no', to walk away and to say they don't want to get involved.
3. Action is taken for all minor incidents. This reassures bullies and victims that the behaviour is not tolerated.
4. An incident form is completed by the Designated Safeguarding Officer or another member of staff detailing the allegation.
5. Players who witness a bullying incident are told to not stand by and watch, not to join in and to tell their coach. As such, incident forms are also completed by players who are reported to have witnessed the incident.
6. In cases of serious bullying, advice may be sought from Birmingham County Football Association, the Football League or the Football Association. If necessary and appropriate, the Police will be consulted.
7. Parents should be informed and will be asked to come in to a meeting to discuss the problem.
8. In some cases, the football club will get all parties involved together as it may be that a genuine apology solves the problem.
9. If this fails or is not appropriate, staff including the Academy Manager, the lead coach of the relevant phase and the Designated Safeguarding Officer should meet with the player making the allegation and their parents/carers to get details of the allegation. Minutes will be taken and agreed by all as a true account.
10. The same staff should meet with the alleged bully and their parent/carer and put the incident raised to them to answer and give their view of the allegation. Minutes will be taken and agreed by all as a true account.
11. If bullying does appear to have taken place, the individual should be warned and given disciplinary action. Consideration should again be given at this time as to whether a reconciliation meeting between all parties is appropriate.
12. At this point, the bullying behaviour should stop and an attempt made to help the bully or bullies change their behaviour.
13. If this fails and the bullying is seen to continue, further disciplinary action may be taken and if the behaviour continues, the players may be deregistered from the club.

14. All coaching staff who come into contact with the players involved will be made aware of any incidents and the outcomes from club action.

In the case of adults reported to be bullying anyone in the Club aged 18 or below:

1. The Designated Safeguarding Officer should be informed and will advise on the action to be taken. This may be done after seeking advice from Birmingham County Football Association, the Football League or the Football Association.
2. If the allegation relates to poor practice, they may be asked to have further best practice training or to re-do their FA Safeguarding Children workshop.
3. More serious cases will be referred to the Police or to Children's Services and the adult concerned will face disciplinary proceedings.

7. Prevention:

Birmingham City Football Club has a comprehensive anti-bullying policy in place. All new coaches, players and the parents/carers receive a copy of this policy when they begin at the Club and a further copy at the start of every new season they remain at the Club. They sign a pro-forma to say that they have received, read, understood and agree to adhere to the policy. This is kept in their individual files.

In the event of a bullying issue, the Designated Safeguarding Officer will meet with appropriate other members of the Senior Management Team to discuss the issue openly and constructively and consider the best methods of approaching those involved.

8. Contacts

Your Designated Safeguarding Officer at Birmingham City Football Club is Wes Hughes, and he can be contacted as follows:

Email – wes.hughes@bcfc.com

Direct Line – 0121 244 1526

Mobile – 07843 419222

Mark Sinclair is the DSO/Head of Education & Welfare within the Birmingham City Academy, and he can be contacted as follows:

Email – mark.sinclair@bcfc.com

Direct Line – 0121 667 1731

Mobile – 07500 822981

Further advice on anti-bullying matters can be obtained from:

- Birmingham County FA County Football Association's Safeguarding Officer, Richard Watson.
Tel: 07980 830656. Email: richard.watson@birminghamfa.com

- Alexandra Richards, Safeguarding Manager EFL, The Football League, Operations Centre, Edward VII Quay, Navigation Way, Preston, PR2 2YF
Email: arichards@efl.com Tel: 01772 325811

- The FA/NSPCC Child Protection 24-Hour Helpline 0808 800 5000
www.FootballSafe@TheFA.com

- Or by going direct to the Police and/or Social Services

SECTION THREE

- INTRODUCTION
- WHAT IS SAFEGUARDING?
- HOW TO RECOGNIZE CHILD ABUSE
- HOW TO RESPOND TO ABUSE/POSSIBLE ABUSE
- HOW TO RESPOND IF CONCERNS ARE EXPRESSED DIRECTLY TO YOU
- ONGOING RESPONSIBILITIES - WHAT HAPPENS NEXT?
- POTENTIAL OUTCOMES FOLLOWING AN ALLEGATION OF CHILD ABUSE BEING MADE
- GOLDEN RULES



INTRODUCTION

Birmingham City Football Clubs Board of directors and I have a duty to ensure that all children and adults at risk associated with the Club must be safe at all times.

Over recent years not only the community as a whole but organisations inclusive of our Club, have come to understand that Child Protection is of utmost importance. In 2004 alongside the response to the Premier League and the Football Association requirements, BCFC appointed a Safeguarding Service Manager to embed and take responsibility in leading, creating and maintaining a safe environment for all children to enjoy all aspects of football, free from all types of harm.

Our current standard of practice ensures that all staff are responsible for implementing and re-enforcing the policies and procedures in this document within their usual working environment. It is important to understand that we all have a duty of care regardless of position or standing.

It is imperative that all stakeholders and advocates have an awareness of these policies and procedures, and that these are a visible reference point to act as guidance and support, however, the primary point of contact should always be with the Safeguarding Service Manager where applicable.

These procedures are fully endorsed and supported by the Board of Directors of Birmingham City Football Club and must be followed by everyone associated with the Club in whatever capacity they hold. All concerns relating to the safety or well-being of children will be acted upon and these procedures followed.

“If people contact us sooner about neglect, the intervention could be earlier and there would be less harm to the child”

NSPCC helpline counselor

WHAT IS CHILD ABUSE?

It is best to consider Child Abuse as a phrase which describes any deliberate act towards a person under the age of 18 or a failure to act that results in a child being injured, harmed, marked or maimed, put at risk of any of these or damaged in such a way that they fail to meet their potential. These are more commonly known as Acts of Commission or Acts of Omission. Later in this document different types of abuse are defined.

It is based not only on the child's perception of being abused, but also what society and legislation has deemed as inappropriate for a child to be exposed to, or failed to be protected from, usually by those know to the child and holding a position of trust regarding care of the child. This can be inclusive of family members, relatives and / or employees/representatives of the Club.

Many people believe that only certain types of children are abused and that only certain types of people abuse them. This is of course a myth. Both victims and abusers come from all walks of life regardless of social, psychological, economic or ethnic factors and abilities.

It is a fact that most abuse occurs within the family setting and that the greatest groups of abusers are known to the child before the abuse occurs. However, it is also important to acknowledge that abuse does take place within professional establishments, where people in positions of trust with a duty of care to children operate, thus making child protection a pertinent issue in football.

WHAT IS SAFEGUARDING?

“Safeguarding is essentially about keeping children and young people safe from abuse or neglect. All those who come into contact with children and families in their everyday work, including people who do not have a specific role in relation to child protection, have a duty to safeguard and promote the welfare of children”

(Birmingham Safeguarding Children’s Board website, 2006)

Football is a team game, each individual playing a separate but significant part that enables one player to score a goal. Safeguarding also involves team work, working together to eradicate the potential for an individual or group of individuals accessing a child or children for inappropriate or criminal activities. It is the actual way in which alert trained adults undertake their duty of care towards a child’s/children’s wellbeing have been entrusted to them.

In the Club’s response to an allegation of child abuse, you are one of those many players who is responsible for ensuring children in your part of the Club’s overall functions are safe.

To enable this to work, you as the first team member to become involved, will need to rely on the other team members, especially the Safeguarding Service Manager to have the experience and expertise in the Safeguarding arena to help you make the whole team work. That is why you are required to contact them immediately when you have concerns and in so doing sharing the responsibility to safeguard a child.

For many people the whole topic of Safeguarding Children conjures up a vast amount of concerns. Some relate to the individuals own experiences, some to what has been represented in the media and others chose not to think about it because it is too distressing. These are all reasonable issues but just think what it means to the child, then act appropriately.

Good Child protection practice equals good Adult Protection. If all adults follow the Safeguarding Children Procedures then identifying those practices or that individual who is abusive becomes easier and the burden shared.

HOW TO RECOGNISE CHILD ABUSE

AWARENESS OF POSSIBLE ABUSE

A Child Protection issue may come to your attention in various ways, the most common are:

- A child makes a direct allegation
- A child talks about something which is suggestive of abuse
- A child has injuries suggesting abuse
- A child behaves in a way which suggests abuse
- The way an adult talks, behaves or conducts themselves raises questions as to their suitability to be with children

Children’s Services or Social Care previously known as Social Services have the lead responsibility to investigate child abuse. This is a statutory obligation and is laid down in the Children Act 1989, Section 47. Police have a duty to investigate if a crime has been committed and is why they work with Children’s Services, who have the responsibility for coordinating all investigations.

Simply having the knowledge of a concern and how it was presented to you is grounds enough to talk to the Safeguarding Service Manager who if necessary will speak with the protection agencies.

Do not make judgments or assumptions about an injury, listen to what you are being told in a calm manner pay attention to detail and exact wording. Remember that many years of experience, research and enquiries have established the difference between an accidental bump that was acquired in play and evidence of a serious assault. Don’t forget that there are usually other warning signs if we choose to see them, like neglect or emotional abuse.

POSSIBLE SIGNS OF ABUSE

As a brief guide the following are believed to be the most common sites of non-accidental injuries which you could see without examining a child, removing clothing or be told about by another:

- Hand slap marks on face, arms legs
- Distinct edges indicative of being hit with an implement –belt, slipper
- Pinch or fingertip bruises, usually on upper arms
- Bruising to eyes and eye sockets
- Split lips with damage to the skin that attaches the top lip to the gum
- Any bruising to torso, buttocks, thighs or around genital area (both girls and boys)

Remember it is not always possible to see bruising, it can be feint, concealed with makeup and disguised by skin colour. It is also important to note that there are some skin blemishes that look like bruising which are not, but it must be left to a clinical expert to define between the two. Obviously if you have known a young person for months and they present the same mark on every occasion in the same place, same shape, same colour then it is likely to be a skin blemish/birthmark. It is still worth checking, never assume anything, and remember there could be other siblings or friends of a group in trouble.

HOW TO RESPOND TO ABUSE/POSSIBLE ABUSE – GUIDELINES

Thankfully today we no longer live in a society where child abuse can be ignored and it is essential that those entrusted to respond to allegations of abuse are trained and are refreshed while in their roles. In your role at the BCFC a child or adult may approach you with concerns, the Club will help you to react appropriately while always remembering it is not nor will it ever be your responsibility to investigate any allegation of abuse.

You may wonder “why not?”, child abuse covers a range of situations and circumstances, the majority have attached a degree of criminal accountability. All have monumental long- term effects on the child involved. How you react to the initial allegation /disclosure could totally jeopardise the situation.

It is therefore the responsibility of the protection agencies, these being the police and children’s services, to manage the allegation in a way that does not create further problems or difficulties. For example it is a human response when faced with a distressed child to ask “who did it, when, where? etc.” but if the responses trigger further distress or abuse to the child you are not equipped to manage this.

Additionally, if criminal proceedings are to be considered you could easily contaminate the child’s testimony, or leave room for any defense solicitor to suggest you influenced the child and therefore make a prosecution impossible.

- Stay calm, do not rush into inappropriate action, reassure the person confiding in you that they will be supported and it is right for them to talk to you.
- Take the child/adult into a private but safe, open environment and whenever possible make sure colleagues know what you are doing.
- Do not make judgments or jump to any conclusions or make assumptions.
- Do not make any promises, especially that you will keep information a secret. You must explain you have a duty of care and are duty bound to tell other people to stop what is happening or to take other action.
- Listen to what is said, do not prompt, do not question, make notes and record what is said using the actual words not your own words or interpretation, this is of utmost importance.
- Remember if you do ask questions you could put a child at further risk and you could contaminate evidence thus preventing the police from taking any further action.
- Contact the Safeguarding Service Manager Wes Hughes 07843 419222 straight away and explain what has just occurred, if you cannot speak to her then try to speak to:

o Joanne Allsopp, Chief Coordinating Officer - 07717 458111

o Michelle Daly, Head of HR – 07817 333230

o Kristiaan Speakman, Academy Manager (Academy Specific Issues) – 07966 347222

It is highly unlikely that you will not be able to get one of us, but in the unlikely event of this happening then you must speak to the police direct.

- Under no circumstances should you speak directly to anyone regarding the allegation or information shared with you including the parents/guardian of the child, including other adults at the Club, the press or any legal representative at any time. It is the Safeguarding Service Manager responsibility to deal with this.
- You must take a full written record of what was exactly said, using the language used not your interpretation before the recollection fades and ensure this is given to the Safeguarding Service Manager as soon as possible. If you have had to go straight to the police, then it must be given to the joint investigation officers.
- This process will apply, irrespective of the relationship to the alleged victim.

HOW TO RESPOND IF CONCERNS ARE EXPRESSED DIRECTLY TO YOU

It is of utmost importance to remember to stay calm and remain non-judgmental when responding to the person confiding in you. In the event of a disclosure it is important that you firstly reassure the child that their welfare is, and will always be, the paramount consideration in any situation. However, they should also be made aware that in certain circumstances you may have a legal obligation to refer the concern to other designated persons/agencies for investigation.

Useful tips:

- Reassure the child or adult at risk
- Do not ask them probing questions
- Do not make suggestive comments regarding their concerns that may implicate or imply
- Never make assumptions and remain non-judgmental
- Following disclosures it is essential to contact/inform the Head of Safeguarding immediately or other Designated Safeguarding Officers
- Written reports of the facts must be submitted to the Head of Safeguarding within 24hrs of the disclosure

In all circumstances the information shared with you is totally confidential and you must not disclose or discuss it with anyone other than the Safeguarding Service Manager or other Designated Safeguarding Officers advised to you by the Head of Safeguarding.

Even after the immediate situation has been resolved you must not discuss details in any way at any time. In refresher training, which is managed and/or recognised by Birmingham City Football Club as appropriate, anonymous reference may be made when quoting your own practice in the situation but absolutely no personal details that can identify any child or any perpetrator are to be shared.

The only exception to this is if you are involved in any legal action associated with the allegation or directly requested to disclose information by the Safeguarding Service Manager within the investigation or protection of the child the information relates to. Any infringement of this will be deemed as a serious breach of policy and procedures and will mean disciplinary action will be taken.

In those early moments even the setting in which the discussion / allegation takes place is important, you must try to keep the discussion private and out of ear shot of others but do not take the child into a room alone under any circumstances. This may well be difficult, as the child wants to talk about their concerns and would have had to sum up the courage to do so over a long period of time and just wants to get it out. They may be unaware of the wider surroundings and who could be listening as they become focused only on the situation.

You must record, in writing, exactly what was said to you using the language the person/child used and not your interpretation or your words. It must be word for word noting any gaps or emotions or body language that comes with it. Most importantly you must share it by passing it on to those who can support you and ensure it is investigated properly this not only protects the child but the adults around that child too.

Be aware of the child's general behavior, how they interact with adults and peers and if they have any bruises or other injuries it is ok to say "That looks sore what happened?" Record the response and be aware of how often a particular child is bruised and/or withdrawn or possibly acting out of character and seems aggressive or angry when they are usually not. A child could be abused or bullied by a peer or adult, both cases need to be dealt with.

When presented with information directly or indirectly about a child entrusted to your care, you must never undress a child or ask to see the bruise. If the child offers you an un-sleeved arm or rolls up a trouser leg or lifts a skirt hem to show you an injury make sure you record this is what happened e.g. she / he voluntarily did.... If the mark is obvious by looking at the child because it is on an exposed part of the body e.g. face, neck etc. record this. Never touch the injury or immediate area around it, in fact, if possible only look with your eyes and listen.

However difficult and upsetting the situation is for you, you must not comfort or cuddle the child. In no circumstances must the child be allowed to sit on your lap or for both arms to be placed around the child's body. If the child leans towards you for comfort then respond with a reassuring comfort tap on the shoulder, the less physical contact the better. In sight of another adult and the detail of contact made needs to be recorded as soon as possible e.g. arm or forearm touch, tissue to wipe tears, pat on the back etc. Another adult the same gender as the child may be helpful to offer support.

BUT ONLY IF IT IS IN THE CHILD'S BEST INTERESTS AND OBSERVES THE CHILD'S RIGHT TO CONFIDENTIALITY

ONGOING RESPONSIBILITIES- WHAT HAPPENS NEXT

Birmingham City Football Club expects the Safeguarding Service Manager to support you and to take full responsibility for all on-going involvement with the protection agency's investigation along with making sure full co-operation with the protection agencies if the allegations relate to a representative of the Club and to liaise with Human Resources should any disciplinary matters need addressing. This includes suspension without prejudice of the alleged perpetrator. The Safeguarding Service Manager will keep you informed of the process including any expectations the process will have of you. This means you may need to make a statement to the police, attend a child protection discussion etc. You shall be fully supported throughout the process.

The Safeguarding Service Manager is responsible for ensuring that all workers co-operate fully with any investigation and to report any failure to comply with requests to co-operate with the Clubs Board. Anyone not willing to do so will be dealt with under the Clubs Code of Conduct - Disciplinary procedures.

The Safeguarding Service Manager will provide the Board with a briefing on all allegations of abuse and the outcome of any investigation under taken by the Protection Agencies. It is anticipated that any changes in procedures or protocols will be identified through this process and dealt with accordingly.

It is important for you to remember that hearing about abuse is distressing and the Safeguarding Service Manager is here for you too. If you have been affected by being involved in an allegation of abuse talk to them, any contact with them is confidential and will not automatically be divulged to the Club or your line manager.

Once the protection agencies are involved it is their statutory duty to investigate. They will have to have consent from the person who holds legal responsibility for the child before they can talk to the child, unless they decide professionally this is too risky. They will share with the person with legal responsibility the details of the concerns and how they were made aware of them. Any person, raising concerns that are then investigated, will be fully supported by the Club and the Head of Safeguarding. This will be particularly evident when the allegation concerns a representative of the Club.

There will be occasions when the removal of children from their guardians will be considered. You must not allow this consideration to prevent you from acting. In truth very few children are removed and even less permanently grow up outside of their birth family. Whatever story you have been told about children being removed from their parents care, you must appreciate that this can only be done by the direct order of a special court that only deals with children and family matters.

The Children Act 1989 has very strict requirements and no child since it came into force in 1991 can be removed from the care of the legal guardian (usually the parent) without a court order despite what individuals and the media tell us. Virtually all applications and court cases about children have to involve their legal guardian and their legal advisor. It will also include a person nominated by the court, called a Guardian ad Litem (voice for the child) and a solicitor solely to represent the child's well-being.

REMEMBER THAT YOU CAN PROTECT CHILDREN AND THAT YOUR REPORT COULD STOP ABUSE AND GIVE A CHILD A FUTURE FREE FROM HARM

POTENTIAL OUTCOMES – FOLLOWING AN ALLEGATION OF CHILD ABUSE BEING MADE

Following an investigation into alleged abuse there are several potential outcomes, some but not all may involve you, the Club or our representative.

Most of this guidance is written from the perspective of a witness to an incident. If you were the alleged perpetrator the information still stands but it is more likely that you will require additional support.

If you are subject to criminal or civil proceedings, the Club strongly recommends you seek legal advice and discuss with them early on in the process what support can be identified for you. With your solicitor's involvement you must advise the Head of HR of your circumstances to ensure all support you are entitled to from the Club is given.

The first and most important potential outcome is the criminal one. If the police, following advice from the Crown Prosecution Service (CPS), believe they have sufficient evidence and/or witnesses they will commence legal proceedings under Criminal Law. During the period leading up to the court case commencing the CPS will decide who they will call as witnesses or what evidence they will be using during the proceedings and notify them accordingly.

If you are contacted direct by the CPS or the police you must inform the Chief Coordinating Officer or Safeguarding Service Manager straight away so that we can offer support and appropriate guidance to you. You must not discuss your potential involvement in the proceedings with anyone in any way. You may make your family aware you are to attend court as a witness but no details are to be given, unless you are the defendant in the matter.

All criminal matters start within the Magistrates courts but depend upon the nature of the charge or actions within the proceedings they may be transferred to the Crown court for hearing or for sentencing following the hearing in the Magistrates court. It will not always be known in which court the matter will be heard until approximately 6 weeks before the trial is due to be heard. If you are required to attend court to give evidence in respect of an allegation of child abuse involving the Club, then the Club will cover your work hours and you will not lose any pay. It is therefore necessary for you to advise the Chief Coordinating Officer of when the court case is being held. You will be given a form by the court to claim travelling and subsistence expenses. You will need to submit this to the court administration offices, once you have concluded your evidence. You will not have any loss of earnings to claim.

As part of the criminal proceedings process witness statements made during the investigation can be agreed between the parties without the individual having to attend court and should this be the case you will be advised of this. Unfortunately, this is not always well in advance of the matter being heard, so you will need to keep the diary date free in case you are still required to attend court.

The Safeguarding Service Manager will be in a position to explain what you can expect when attending court to give evidence. You may also have contact with the witness support service and if you have any questions make sure you ask them. If disciplinary action is deemed necessary, it will commence at the end of the Criminal proceedings.

The second potential outcome is that the police are unable to commence criminal proceedings but that the Local Authority/children's services are. These are called Civil Proceedings and are the most common taken against family members. Once again the information gathered through initial investigation will be scrutinized by the lead officers in the Local Authority and a decision taken as to what action they will take. This can vary tremendously and can be an application for an Interim Care Order or some similar court order governed by the Children Act 1989.

It is highly unlikely that you will be called to give evidence in these matters unless you have direct eyewitness testimony of an incident, but even then the normal approach is to have statements accepted without attendance as these hearings are held in private. What is much more likely is that the Local Authority will convene a forum in which to discuss the child and the concerns raised, to decide if they are in need of protection and then to agree on what information is required to take forward a civil application. These meetings are usually called Child Protection Conferences and the Club will usually be invited to contribute to this.

As a witness in any child protection incident involving the Club it is not acceptable for you to attend without the Safeguarding Service Manager or nominated other, and should you be contacted by the Local Authority or one of its officers direct you must re-direct them to the Safeguarding Service Manager or the Chief Coordinating Officer who will take the decide whether or not you will attend and what information will be made available to that forum. Should attendance be seen as appropriate the Club will cover any loss of earnings? However no travel

or subsistence will be available due to the court reimbursing for this as they have requested your attendance.

The Club may commence any disciplinary action deemed necessary at the same time the Local Authority commences their action and the two matters may run alongside each other.

The third outcome is similar to the above except that it would not be Local Authority intention to apply to a court for an order. Instead they would be looking to work with the family to ensure the child is safe and protected from harm. Again a Child Protection Conference would be convened and the protocol described above would apply.

The final potential outcome is that neither Criminal nor Civil proceedings are appropriate but that an individual may still be accountable under Employment Law. This may also apply once the Criminal and Civil proceedings have concluded. The Club has the responsibility to carry out an investigation to establish if any of the matters in hand lead them to believe the individual is not suitable to retain their post or that their actions constitute a fundamental breach of the contract. The process may result in a disciplinary hearing and potentially you may have a role to play in that, the Head of HR will keep you advised of what part you will play, if any, in this process.

You are reminded that irrespective of which potential outcome applies; you will be required to assist the process. The expectation is that you will conduct yourself at all times as a representative of the Club and will maintain confidentiality at all times. The Safeguarding Service Manager and the Head of HR will support you throughout your involvement and depending on need afterwards too.

In some circumstances no specific outcome will be taken or may be advised to you. Whilst this is sometimes difficult to accept, you will be required to rely on the professional expertise of those involved in the Child Protection agencies to conduct themselves and the investigation to the best of their ability, responsibility and legislative power.

However, if you have concerns regarding the professionals conduct or the manner in which the investigation has been conducted, then you must only discuss them with the Safeguarding Service Manager and Head of HR who alone have the responsibility to take any further action.

THE INFORMATION IN THIS SECTION IS VAST AND MAY EVEN APPEAR DAUNTING YET IT IS IMPORTANT THAT YOU ARE AWARE OF THE NUMEROUS CASE SCENARIOS.

ALWAYS REMEMBER YOU WILL BE SUPPORTED THROUGHOUT AND THAT THE SAFEGUARDING SERVICE MANAGER AND THE CLUB ARE HERE TO SUPPORT YOU THROUGHOUT THE PROCESSES THAT MAY OCCUR.

PROCEDURES:

- Ensure that the young person is not at immediate risk of further harm. In the event you have concerns then the police should be contacted.
- Be prepared to listen.
- Don't make judgments or assume anything about the information shared.
- Act immediately, irrespective of your location.
- Don't start investigating the allegation, the complaint or the alleged perpetrator.
- Ensure that you record the actual disclosure accurately, and where possible within 24 hours.
- Ensure that you report the incident/concern to the Head of Safeguarding, or The Head of Human Resources immediately of the disclosure..
- Inform the young person that you have a duty of care to pass all information on to relevant parent/guardians/agencies, providing you don't have reason to believe that this will potentially escalate further risk.
- Cooperate with the protection agency's investigation and make yourself available to attend interviews.
- You can discuss with the Safeguarding Service Manager or The Head of Human Resources any concerns or residual distress you have regarding the information shared with you.
- Be prepared to follow through your professional commitment by attending court or other similar professional forums.

SECTION FOUR

BCFC GENERAL CODE OF CONDUCT FOR ALL STAFF PARENTS & PLAYERS

- INTRODUCTION & GUIDING PRINCIPLES
- SAFEGUARDING CHILDREN - GUIDELINES FOR PERSONAL CONDUCT
- MASCOT COORDINATOR & JUNIOR FANS CLUBS
- BEAU BRUMMIE & BELLE
- FIRST TEAM PLAYERS
- ALL MEDIA AND COMMUNICATIONS OFFICERS
- PHOTOGRAPHY / IMAGERY
- COACHES AT ALL SITES FROM ALL DEPARTMENTS
- SCOUTS
- DESIGNATED DRIVERS
- MEDICAL AND HEALTH PERSONNEL
- VISITING OFFICIALS (AWAY & REFEREES)
- PARENT/PLAYER CODE OF CONDUCT
- NON OR LATE COLLECTION OF CHILDREN

INTRODUCTION

This general code of conduct has been developed by the Club for all staff. It applies to all activities that operate within the Club at any site. Staff with specific roles that have direct contact with children will also be required to follow guidance within the specific code of conduct as stated within this section. Each code of conduct will provide guidance on best practice, which should safeguard children attending or participating in an event alongside safeguarding staff involved in that event.

GUIDING PRINCIPLES

Any activity run by or attached to the Club on any site will be covered by this code of conduct. The Club strive to ensure that every child who attends, is safe, and enjoys their experience.

Advice from the Safeguarding Service Manager and HR must be sought in relation to all events, activities, marketing or commercial initiative which is designed or targeted to be delivered to any person under the age of 18 years old. Included in this will be the recognized promotion and delivery of every event.

In respect of external organizations using BCFC facilities for their own events consultation is always required. The Safeguarding Service Manager will confirm that all policies, procedures, obligations and liabilities in line with the safeguarding of children and adults at risk are adequate. The named person making the booking has the responsibility to notify the Safeguarding Service Manager of the forthcoming event.

The Club believes that Safeguarding is everyone's responsibility. Should there be a potential risk posed to Children or adults at risk our working practice should trigger an impromptu response. Our guidelines, policies and procedures should significantly reduce and ideally prevent any further risk.

It is the Boards expectation that all parents and legal guardians/guardians should be vigilant towards any potential abuse and will help us protect not only their children, but all children within our care. We encourage advocates, parents and guardians to report any concern or conduct that worries them immediately. All reports should be directed towards a responsible person whenever possible. The Safeguarding Service Manager should be made aware of all issues preferably as soon as possible but certainly within 24 hours of the incident occurring.

It is important for all individuals to understand that irrespective of the context of the contact with a child. The Club will hold the adult responsible for any problems that are encountered and will need to see evidence that the adult acted inappropriately.

Evidence will take the form of one or more of the following:

- Written or verbal contact with the Safeguarding Service Manager or other senior officer at the time of the incident
- Support of the incident via close circuit television recording
- By personal testimony of another colleague or worker in the Club, so long as it is clear that no collusion or coercion has occurred between the two adults or that a personal relationship exists between the two adults.
- Another adults' testimony is forthcoming (e.g. police officer, medic, parent) whose full personal details are available to the Safeguarding Service Manager for verification. Where too it is established that no collusion or coercion has occurred between the two adults, or that a personal relationship exists between the two adults.

SAFEGUARDING CHILDREN – SPECIFIC GUIDELINES FOR PERSONAL CONDUCT

- Do not allow yourself to be in a situation alone with a child. Where so ever possible assure that there are at least 2 adults present, especially in enclosed environments.
- Under no circumstances are you to divulge your personal details, contact telephone numbers or anything about your personal life to any person under the age of 18 years old.
- Under no circumstances must you take or go into the toilets with a Child who is or appears to be under the age of 18 years old. If asked by a Parent to escort their child to the toilet, regardless of sexual orientation, you must refuse. Good practice would be to advise the Parent to use a Parent & Child or disabled toilet. This will enable the Parent to adequately supervise their Child. It is reasonable to assume that an

adult is the parent or designated person in care of a Child without checking. However, if there is anything that provokes untoward thoughts or the child's behavior suggests something is not quite right, it is always good practice to enquire further if you are comfortable doing so. Otherwise, you may also report your concerns to a responsible adult or The Head of Safeguarding.

- Any negative or further worrying responses must be reported immediately. Dependent on the context of the situation, this may be to a senior officer at the site of the incident. Regardless of whom you tell first, in all circumstances you must report the incident to the Head of Safeguarding. Occasionally, this may be the first point of call.

IF YOU ARE GENUINELY WORRIED ABOUT THE IMMEDIATE SAFETY OF ANY CHILD YOU MUST SEEK IMMEDIATE ASSISTANCE TO SUPPORT YOU.

- Any action you consider must not include detaining by physical means any individual, but it might include asking them to wait with you whilst you await support from a colleague.
- Do not give sweets or gifts, however small or insignificant to you, to any child you have contact with whilst acting for the Club. You may mean well, but your actions could be misinterpreted by the Child and others.
- If a child becomes tactile with you e.g. tries to hold your hand, sit on your lap or tries to cuddle you; you must tell the child that this isn't acceptable and report the behaviour to a senior member of staff and ensure a log is made via the appropriate recording system. However, when greeting a Child, it is acceptable to shake their hand, as you would an adult.
- If a child is distressed, crying or frightened, it is important not to try to cuddle or draw them close to your body. Again you may use words. Remember they are not your child and should not be treated physically as they were. Avoid situations which could invite assumptions or misjudgments, as these may lead to allegations. If a child is distressed it is appropriate to offer support, reassuring the Child that you may be able to help. Extreme care must be taken not to follow an adult's instinct to comfort a child in any physical way, which could be seen as inappropriate. Any such situations must be reported to a senior officer and the Safeguarding Service Manager to allow accurate reports to be collated.
- You are not permitted to accept social invitations to any event from a child or their family you may have met through your professional role. In some rare situations this might be appropriate, however, all circumstances must be discussed with the Safeguarding Service Manager before the event takes place.
- You are not permitted to take photographs of any child or their family using your personal devices. Any such activities must be undertaken using Club property. If asked by family members to take a photograph of them, this is permitted using their devices. Where possible, ensure you have another member of staff present, who can verify that permission was given.
- At no time must you promise to get access to an autograph, player, manager or other prominent figure. If the opportunity presents itself for the child to be given appropriate access to an individual, then it should be encouraged but no personal credit should be taken.
- Under no circumstances are you permitted to accept gifts from children or their designated adults, this includes money. Should you receive any such token then make the Safeguarding Service Manager aware, ensuring transparency and alleviating any future implications which may arise as a result.
- At no time should you use offensive/ obscene language around children.
- Should you become annoyed, angry or disgruntled, you must remain professional. In circumstances where you feel this may affect your capacity to provide care for Children under your supervision, you must report this to a colleague and where possible seek support or take a break.
- If you observe a colleague becoming unsettled, maybe suggest they take a comfort break. Again, ensure you are not the only adult with the child. If you are the reason for your colleagues upset seek the intervention of a supervisor or third party to assist you both.
- Never physically or verbally chastise a child. You must in all situations engage the parent/guardian or designated person who is responsible for them and request they take suitable action for any child's behaviour. Never suggest or permit reprimands in public; guide them to do so in private, in the presence of another adult.
- If a child has to change clothes (into a kit, for example), supervision of changing must be given by the parent/guardian or designated person. A suitable private area needs to be made available. Under no circumstances must a child change in public, nor any area that is not designated for changing. The removal of tracksuits pitch side is exempt from this protocol.
- If the activity you are involved in requires a child to climb on equipment, you must not handle them without a child verbally asking for help and the designated person cannot give the child assistance. Remember to have as little physical contact as possible.
- If this cannot be avoided, as the child needs to be lifted, then place your hands as carefully as possible on the outside of the child's torso, avoiding chest area if female and avoiding lower torso with male and female.
- All physical contact with children should be avoided.
- At any time, in any environment within the Club, any person from the Club may ask an individual for proof of identity. If their response makes you feel uncomfortable, suspicious, then security must be informed before allowing the individual to continue the activity they were

engaged in prior to your enquiries. Especially, if they are photographing an activity, albeit, a child or adult event. Never put yourself at risk of abuse or threat or attempt to detain any individual.

- If any member of the Club is alerted to child or adult at risk, it is expected for that person to act appropriately, in line with the Safeguarding Policies and Procedures. INACTION IS NOT ACCEPTABLE. If you have acted in good faith, and whether you are right or have misunderstood a situation, you will be fully supported by the Clubs Board and the Safeguarding Service Manager in any circumstance.

MASCOT COORDINATOR & JUNIOR FANS CLUBS SPECIFIC GUIDELINES

- General Code of Conduct guidance must be followed; the specific code of conduct is directed by the Mascot Coordinator, although the general requirements of the specific code must also be followed by those engaged in the Junior Blues or any Club Membership scheme aimed at or created for U18s. If unsure ask the Safeguarding Service Manager for advice.
- The Mascot Coordinator is responsible for all preparation and delivery on match day. This includes ensuring appropriate liaison with catering, security and stadium tours have been undertaken. The Mascot coordinator will not be responsible for recruitment, selection or checking of employees.
- The Safeguarding Service Manager alongside the Mascot Coordinator is responsible for ensuring these duties are conducted in line with Safeguarding Children procedures. Any concerns or breaches will be dealt with by the Head of Safeguarding. If the Safeguarding Service Manager is not available, report concerns to him as soon as possible via email or phone.
- The Mascot Coordinator is expected to create and support an itinerary that is age-appropriate and entertaining. All elements of the proposed package must be in place at least 24 hours before delivery.
- The Mascot Coordinator will be supported in the delivery by suitably trained, DBS checked, Club personnel, who shall be known as the Mascot Team.
- When preparing the publicity associated with the mascot package, the Safeguarding Service Manager will ensure it is detailed in the text that no child is permitted unless accompanied by a parent, guardian or appropriate adult over the age of 18.
- Photographs of a Mascot Child must not carry the name of the child or identify them in any way.
- Any child spending time with the Mascot package must be supervised by their appropriate adult as explained above, except when asked to do otherwise by the Mascot Supervisor or Head of Safeguarding.
- The Mascot Coordinator alongside the commercial team will ensure that the Safeguarding Service Manager is advised of each matches package including any special needs.
- The Mascot Coordinator will ensure that each matches itinerary includes the following essential elements; meeting the players, entertainment including stadium tour, refreshments, and suitable goody bag, match day literature-for both Mascot and adult supporters, keep sake photographs, suitable seats and half time refreshments.
- No child may be photographed unless the child's responsible adult has given written consent to the Mascot Coordinator before the planned event.
- The Mascot Coordinator must be suitably dressed in their BCFC full costume with minimal jewellery etc.
- The Mascot Coordinator should only take/make mobile calls if urgent and of a work nature.
- Whilst 'on duty' as the Mascot Coordinator, no alcohol must be consumed.
- Age appropriate language must be used at all times
- The Mascot Coordinator will meet and greet the Mascots and their guests on arrival to the ground making sure appropriate supervision is in place throughout their experience.
- No alcohol is permitted in the Mascot lounge. Parents must be directed to areas where they can purchase and consume alcohol.
- A child must only leave the Mascot lounge with their appropriate adult and Mascot Coordinator.
- Special attention and support is to be made available by the Mascot Coordinator if an away Mascot is included in the package.
- The Mascot Coordinator must ensure that no bullying, intimidation or negativity is used against the away Mascot and their supporters at any time during the package progression or at pitch side.
- Inclusion in the entertainment, refreshments and a goody bag must be equal, although items may be substituted if needed.
- The Mascot Coordinator will ensure that only designated or approved support is used within the package. Any person who attempts to join the party will be asked to leave and security called if needed.
- If the Safeguarding Service Manager is not present, the Mascot Coordinator is to advise him immediately of any attempts to access the Mascot lounge.
- The Safeguarding Service Manager will take responsibility for ensuring a safe passage to pitch side is secured through the player's tunnel.

Alternatively, the Mascot Coordinator will ensure the transfer from lounge to pitch-side in a safe and child-secure manner.

- The Mascot Coordinator is responsible for ensuring all Mascots' adult supporters are transferred in an orderly manner to their seats, checking that all belongings have been taken with them on exit.
- The primary responsibility remains with the Safeguarding Service Manager for the wellbeing of the mascots once pitch-side. However, this will be shared with the Mascot Coordinator who jointly takes any action needed regarding the Mascots well-being. Especially, from the 1st Teams' warm up area.
- The Mascot Coordinator will oversee the warm up sessions, photographs with the community department, the photographer and Beau Brummie.
- The Mascot Coordinator will escort the Mascots to the tunnel, ensuring adequate time is made available for the walk out.
- The Mascot Coordinator is responsible for ensuring the Mascots are allocated to players for the walk out in a fair and unbiased way; promoting equality and diversity.
- The Mascot Coordinator will also ensure the Mascots are collected by the appropriate player as they progress out of the tunnel.
- Once the Team presentations have been made the Mascot Coordinator must ensure the safe exit from the centre circle to middle tunnel and then on to accompanying adults.
- At half time the Mascot Coordinator will ensure that the Mascots and their supporters are catered for appropriately.
- At the end of the match the Mascot Coordinator will check whether each Mascot party has any concerns, comments/complaints that the Mascot Coordinator can attend to. Any comments/complaints should be reported to the Safeguarding Service Manager and the Head of Corporate sales at a convenient time, away from children and adults at risk.

[COSTUMED] MASCOT: BEAU BRUMMIE & BELLE GUIDELINES

All the general Code of Conduct principles and guidelines must be followed, alongside these additional notes, as Mascots can work in vulnerable situations. If the [costumed] Mascots have any concerns regarding their conditions of work, they must speak to the Safeguarding Service Manager for advice/guidance immediately.

- Mascots attending matches, events or charitable occasions must be wearing the full Club Mascot Suit. The Mascots must remember that the media see them as icons for BCFC.
- Mascots are not permitted to receive or make mobile calls whilst in costume.
- Mascots 'on duty' must not smoke or drink alcohol.
- Children, especially younger ones, will not associate the furry sight of Beau or Belle Brummie with an adult. Remember, the size of the mascots may frighten the younger child initially or they may be in awe or unsure. Mascots must not approach a child from an unsighted position. With familiarization a child will tend to gradually welcome the antics and playfulness of the Mascots.
- Playfulness should never include 'horseplay' with any child. Gently kicking a football to and fro is fine, as is 'high fives' or 'handshakes', but no full on body contact e.g. hugs.
- When posing for photographs, whether family or professional, the child must not be encouraged to sit on a lap or a knee. Kneeling beside a child is acceptable. The Mascots may place their 'paw' around the shoulders of a child for photographs, but be mindful not to touch the chest area.
- Parents may encourage a child to cuddle or kiss Beau Brummie or Belle, therefore a mascot must never be referred to by their own, everyday name, as this can confuse/worry the child. The illusion that the mascots are furry animals should be preserved. Mascots must only be seen in full costume e.g. never with head piece off.
- While in costume the mascots are not permitted to speak, yet should there be a problem, they must attract the attention of supporting staff to help them.
- It is essential that staff supporting Beau Brummie or Belle in official duties are aware that visibility is seriously restricted by the heads of the costumes and to make sure children are not standing or playing in the Mascots unsighted view. The potential for risk of physical harm will be significantly reduced if staff remain vigilant.
- Additionally, over eager parents or older children must be prevented from engaging in any dangerous behaviours with the Mascot's costume that could result in any injury or difficulties for the Mascot adult, or to spoil the illusion for younger Mascots.
- The costume must be returned to its storage area and if there is any damage or need for repair, this should be notified after each use.

FIRST TEAM PLAYERS SPECIFIC GUIDELINES

The role of the players doesn't outline any supervisory roles of Children and/or adults at risk. With this in mind and in order to safeguard individuals from potential allegation or inappropriate behaviour, the general principles and preceding guidelines must be adhered to. In addition, when undertaking responsibilities towards Junior Blues, Mascots or at charitable events; players must be supervised at all times by personnel from the Club.

On match days, if Mascots are allocated to an individual player, then the only physical contact will be hand-to-hand during the actual pitch walk on and at no time should the child be lifted or carried by the player. If photographs of the event are to be taken, then an arm loosely placed around the closest shoulder of the child may occur.

It is essential to protect players from deliberate or targeted inappropriate fan attention, but at the same time support enthusiastic fans safe access to the players. This is more evident at charitable appearances, particularly those related to sick or particularly vulnerable children, including those with learning difficulties.

Physical contact between players and under 18's can occur, but it must always be minimal, public and restricted. The following is the expected conduct:

- Whether attending matches, events or charity events; all players must be properly dressed and attired. Players in the media eye must remember they are perceived as icons for the Club so Club tracksuits/suits with the Club tie preferred. However, if the situation suits more casual clothes, the players are requested to limit designer clothes and jewellery wear to a minimum.
- Whenever and wherever possible, players are requested not to make or receive mobile calls when involved in presentations.
- While 'on duty' at an event for children or with a group of under 18 year olds, players are not permitted to drink alcohol.
- To avoid disappointing children, the players must be punctual and understand the amount of time they have been allotted to be at any event.
- Players must remember that the children and parents you meet are the fans that support the Club and without them the Club could not operate, so be mindful of how you present yourself physically and verbally to preserve this relationship. The supporting officers of the Club will support and facilitate any comfort breaks you may need.
- Players are expected to use child appropriate language at all times. Any mistakes must immediately be apologized for remembering that some 'common usage and / or slang' are also inappropriate e.g. sod it, oh god, shit, bloody etc.
- When attending social events with juniors present, players will need to be vigilant that small children are around and extra care must be taken not to knock them over or accidentally hurt them.
- When children initially approach players they must be conscious to the difference in height and ensure that at all times children are encouraged to approach them from the side rather than the front, unless a player is seated and the child is standing.
- On greeting children, it is most acceptable to shake hands or give 'high' or 'low fives' and to say hello. The patting of heads or ruffling of hair is not to be encouraged, as some children will not appreciate this.
- Players must not stroke faces or hair. It can be misconstrued.
- Players must never kiss or cuddle a child. Should a child approach a player for a kiss or cuddle, players should try their utmost best to avoid contact. A side hug is appropriate, only when other adults, including the parents whenever possible, are present.
- After asking permission, with the players' consent, photographs may be taken. An arm placed around the upper part of the child's shoulders is acceptable.
- Players are encouraged to sit next to a child on a bench or appropriate seating, allowing the child to lean in if they wish.
- During hospital visits, do not sit on a child's bed. This is for safeguarding alongside hospital policy. When a child is in bed, pull a chair to the bedside and lean onto the bed for photographs or to converse with the child.
- If sitting on a bed simply cannot be avoided, it is only with the permission of the parent/s that this may take place. The player must then be aware of the proximity in relation to the child and equally, the player must never lie on the bed.
- Players must never comment on the attractiveness of a child or the style of clothing, as this can be seen as individually picking them out. However, comments such as 'glad to see you have the latest strip on' or 'I prefer the away colours' is fine.
- If players are offered a gift, the player must confirm with the child's parent/guardian/carer that they consent to them receiving the gift and then the player must verbally thank the child for the present.
- If a gift is inappropriate for any child to give to an adult, then the gift must be refused and returned to the adults supporting the child; using the statement of "players are not permitted to accept that type of gift". This specifically refers to alcohol, jewellery, underwear, any image or personal detail of the child, invitation to a family event or money. If in any doubt, the player must consult with the supporting staff of the Club.
- Players must remain vigilant of over amorous adult fans, male or female. It is an acknowledged fact that football players are more susceptible to inappropriate advances than many other professional sports personnel, even in their private life. Public socializing must be thought about in advance. This is to prevent individuals creating situations of embarrassment or humiliation involving players. If members of the public are involved in a social event, players are asked to be aware of the technology that exists to catch players off

guard and the amount of revenue paid for such unauthorised material.

Any concerns or questions regarding players conduct or behaviour around under 18's or adults at risk must be directed to the Safeguarding Service Manager who will assist and support you.

ALL MEDIA AND COMMUNICATIONS OFFICERS

Imagery of children, genuinely obtained or requested, has to be considered within the Child Protection arena. Due to the many advances in technology, the ability to distribute simple and honest images of children into distorted material is all too common. Scarcely a day goes by when the media does not include a story of the abuse of images, predominantly throughout the internet.

In light of the understanding of how images are obtained and circulated, the Club wants wherever possible to minimise the risk. Within these procedures, a specific section exists and all personnel are governed by those procedures. However, the Board looks to all media and communications officers to be extra vigilant in their roles to prevent the Club failing to protect children's images adequately.

As a Club, we have been conscious and took guidance from The Football Association on imagery/photography as well as being commended for our procedures in 2005 by the Independent Football Commission Guidelines 2002-2008 (now replaced with the Independent Football Ombudsman).

When promoting the Club, all Media and Communications Officers must be careful not to expose any individual under 18 old to inappropriate advances or contacts. Under 18's should not be used to 'improve' or give focus to publicity material, whether in a real or virtual way.

All publicity to promote merchandise should use professional models and not family members of workers, players or similar role/positions within the Club. All references to the models must not include any personal details that could identify the child.

When assisting at events or charitable occasion's, media and communications officers must be fully aware of the players' code of conduct and be on hand to ensure compliance is made. The media and communications officers will need to ensure external colleagues do not attempt to manipulate any breach of the players' code of conduct. If needed, the intervention of the Team Manager must be sought.

In preparation of match day programmes or similar documentation where images of fans under 18 are likely to be reproduced, all images must be selected with the prevention of manipulation in mind. No personal detail will accompany the photograph, other than a first name and possibly the general area that they come from. There must not be any mention of surname, school or any other specific personal detail that could assist in the identification of a child to a complete stranger.

Equally all Mascot photos will be passport type showing head and shoulders only; under no circumstances will full length shots be permitted.

All external photographers used to cover events on behalf of the Club will need to come from an agency that conducts its business under FA Guidelines, e.g. as a minimum, they have been subject to a DBS check and have undertaken the 3 hour safeguarding workshop on Safeguarding Children. If this is not the case, consultation with the Safeguarding Service Manager is needed before they engage in any activity.

PHOTOGRAPHS & IMAGERY

Birmingham City Football Club wishes to support and promote the safe and legitimate recording of young people engaged in football activities. As part of our service we recognize our responsibility to safeguard this area of our practice from the minority who would wish to abuse photography and imagery.

To minimise any potential abuse of imagery, BCFC has taken advice from the Premier League and specialist child protection agencies, to produce the following guidance, consolidated into our Child Protection procedures, which must be adhered to at all times. Any infringement or failure to comply with this guidance, by any individual operating under the Clubs sponsorship, will constitute a breach of those procedures and will be subject to further investigation under the Clubs disciplinary procedures.

The Clubs Safeguarding Service Manager will have lead responsibility on this subject. Any further agreed action will need to be approved by him and appropriate procedures implemented accordingly.

Guiding principles

- Every child who achieves any level of personal attainment or success has the right to have this visually recorded as a memento of the achievement.
- Not all adults/children taking photographs of children engaged in football activity should be seen as posing a risk. Rather that their recording could be subject to misuse in the future.
- Any activity operated within BCFC and associated providers will be subject to individual risk assessments which will facilitate a safer working environment. In addition, accurate record keeping and monitoring will inform our working practice.
- BCFC is well aware that not all families will be in a financial position to purchase professional photographs of their children, it is therefore considered that at all events opportunities will be created for a specific posed photograph for the family and their nominated person can take a specific shot. Any group or team shot will require the written consent of each child's parent or legal carer. This consent will also include a general disclaimer from BCFC as to the security of that visual image.
- The same level of expectations will apply to press or television crews and they will be advised as to acceptable and unacceptable practice.
- All major events held under the BCFC umbrella will be covered by an authentic photographer who the Club have DBS checked and is Child Protection trained.
- Wherever possible parent and legal guardians will be advised of the presence of any press or media coverage and will be required to consent directly to the camera operator/photographer to any shot their child is likely to be seen in.
- It is BCFC's expectation that all parents and legal carers are vigilant to possible abuse and to help us protect children in general by reporting any concerns they have to the Head of Safeguarding.

Acceptable imagery

- All children must be appropriately dressed for the activity being undertaken. Off the pitch this would usually include tracksuit or similar clothing.
- All focus will be on the activity rather than on specific children and be at a distance so as to give context to the photograph.
- Under no circumstances will any child's personal details accompany any photograph used in any identifying manner e.g. John from Birmingham is acceptable yet John Smith from 42 Alum Rock Road is not. Any reference or identification of siblings under the age of 18 is not acceptable either.
- Should a parent or legal guardian authorise a specific photograph of their child then they will have deemed to have entered into a specific contract with the photographer, separate to the conditions of this Child Protection procedure and no liability will be held by BCFC.
- All photographers used by BCFC in any event will have had an enhanced DBS check. They will have been issued with a copy of our policies, guidelines and procedures to help inform good practice.
- Any infringement must be reported to the Safeguarding Service Manager immediately for further investigation.
- Any photographs taken with the potential to be used in marketing or in the promotion of BCFC, will only have been taken with the prior written consent. This will be obtained from parent or legal guardian, subject to all conditions contained in this procedure.

Conclusion

BCFC is committed to promoting young people's involvement in football and will strive to apply this procedure with equity and fairness. It is essential that all adults associated with young people in football give their support to this procedure by ensuring it is adhered to. This may include challenging an individual who appears to be infringing the procedures and as long as this is done professionally, the Club will obviously support any individual who does.

The Safeguarding Service Manager will review the effectiveness of this and all Child Protection procedures. Any feedback favourable or not, from any source, should be sent via email to the Safeguarding Service Manager at BCFC for consideration at Wes.hughes@bcfc.com

COACHES AT ALL SITES & FROM ALL DEPARTMENTS

The following guidance must also be adhered to by all coaches, in all environments.

- Ensure you have a good understanding of the expectations in relation to the BCFC Safeguarding Children Procedures.
- In particular, coaches need to ensure they are aware of the different forms of bullying, and they are clear on how to proceed with any issues.
- Staff must conduct themselves in a manner that does not at any time bring the Club or themselves into disrepute. This not only applies to

their work place, but also whilst representing the Club in any capacity. Further to this, individuals must recognize they have a high profile and are in the ‘public eye’. The Club expect individuals to bare this in mind, conducting themselves in a professional manner at all times.

- As a Club representative you must at all times demonstrate a respectful and professional approach to all young people entrusted to you, including an awareness of the language, tone and manner in which you deliver instructions.
- Coaches will need to ensure their personal hygiene and appearance is of a high standard. Remember, players will model themselves on what they see....
- Coaches are not permitted to socialize with the young people they are coaching, regardless of where the activity is taking place.
- At no time whilst on duty may a coach be seen smoking, drinking alcohol or behaving in a way that is less than professional and football focused. Any reports of infringements of this guidance will be treated as evidence of gross misconduct and disciplinary action will be taken.
- Coaches will extend the same level of courtesy to parents, siblings and others supporting the young players. Should there be any difficulties of any sort, then these must be recorded and reported to the coaches’ line manager as soon as practically possible.
- Any allegations of inappropriate behaviour must be reported without delay to the Head of safeguarding.

Under no circumstances must a member of staff discuss allegations with the person who it relates to. Any failure to observe this guidance will be deemed as a breach of Safeguarding Children Procedures and disciplinary action will follow.

- Arrive at the training ground well in advance of the session/game and do not leave until the last player has left.
- Place the wellbeing of each player as the highest priority and practice this guidance at all times.
- Always plan in advance to promote high performance. In addition to this, coaches must have a contingency plan, in the event a session is disrupted.
- In advance of any game, always check equipment thoroughly, and check for any hazards on playing surfaces.
- Ensure the checks of all playing kit are undertaken before games.
- Plan your team line-ups at least 24 hours before games. Substitutes should be taken into account for e.g. Joe Bloggs will play CF in the third & fourth period.
- You should learn the names of all players you will have contact with, including trialists. Try to avoid using nick names.
- You need to conduct yourself at all times in an ethical and professional manner, adhering rigidly to high standards of integrity and fair play.
- Ensure all players are supervised at all times. However, you will need to be aware of privacy, dignity and personal space in some areas such as changing rooms, showers etc.
- Ensure that these areas are left clean and tidy after use.
- You must not play football with the young players and always be careful when demonstrating, since there is a big difference in your strength and ability.
- Only use Club approved training practices and techniques.
- You must guide and support the young players to achieve, rather than dominating or pressuring them.
- Young players need to learn to do things for themselves and be creative in their play.
- Try to establish a mutually respectful and trusting relationship with each player you work with.
- Encourage players to take responsibility for their own behaviour and performance.
- Always promote positive aspects of the sport. NEVER condone violations of the Laws/rules of the game, poor behaviour or the use of prohibited substances or techniques.
- Co-operate with colleagues and management to achieve the best possible outcomes for the players.
- When dealing with individual players, remember not to be alone. Seek support of other players or staff to ensure this does not occur.
- Do not transfer children in your own vehicle or again, if you are alone, seek advice from the Safeguarding Service Manager or your manager about sourcing an alternative, such as a registered taxi.
- Treat officials and visiting players with due respect, in both victory and defeat.
- If players make mistakes, NEVER shout at them. Remember ‘praise in public’, ‘reprimand in private’. Again, always ensure you are not alone.
- Remember to treat them the way you would wish to be treated. Give them time and attention, show them they are valued.
- If players, parents, guardians or other advocates have witnessed any untoward issues, they are advised to discuss these with the Safeguarding Service Manager as soon as possible.

Coaches are reminded that they are dealing with children and young adults, not peers.

You are required to particularly note the following requests from young players/scholars/students:

- Don’t tell me off when I get it wrong.

- I love football- so give me a chance to play and enjoy it.
- Let me make mistakes without being made to feel stupid.
- Don’t expect me to get it right first time - but praise me for trying.
- Don’t slap me down when I ask a question - your answer may help me learn.
- Don’t expect me to be able to produce what we practice straight away - I may not be ready.
- Try other ways of teaching me if I seem to be struggling - I learn if you find the right way.
- Look at me when I talk to you - it lets me know you are really listening.
- Remember, I am a young person not a small adult - sometimes I don’t understand what you are saying.
- Please use words and phrases that I can understand.

SCOUTS

The sole function of a scout is to identify players who they believe have the potential to play professional football. The Club might wish to later enter into negotiations with their parent/guardians, in order to secure their registration. Scouts are not themselves entitled to enter into any such negotiation, nor are they able to make promises or other inducements to any player they identify.

In order to be a scout for Birmingham City Football Club, individuals will be required to undertake a DBS check. In addition, they must attend and successfully complete recognised and accredited training such as the FA’s Talent Identification and Safeguarding Children Workshop. Scouts will be required to evidence they have attended and where appropriate, have also attended refresher courses. Scouts will need to ensure they are aware of the Club’s expectation, in respect to the Safeguarding Children Procedures.

- Scouts are employed by and represent their Club. Under the meaning of the FA Premier League and English Football League rules, which bind them, they are seen as officials.
- Scouts will need to have a full working knowledge of Premier League and English Football League rules, Section N-Youth Development, and be compliant to the specific rules that define their role at Appendix 5 of the Premier League Rules. This is of particular relevance when the Club commences its approach to potential players or students who are subject to registration with another Club.
- When acting in the course of their duties, a scout shall at all times carry the formal means of identification supplied by Birmingham City Football Club and produce it when asked. It is expected that this identification will be produced to the adult responsible for the player before any formal approach is made.
- Scouts are responsible for the conduct of their contacts and shall be liable for any act or omission by a contact, which would constitute a breach of the rules.
- Scouts must conduct themselves in a manner befitting their role as officials of Birmingham City Football Club and will take all steps to promote the reputation of the game and prevent it from being brought into disrepute.
- A scout will disclose to Birmingham City Football Club the nature and extent of direct or indirect interest they may have in any transaction or arrangement that involves the Club and of any benefit they derive whether direct or indirect.
- Scouts must also behave in an ethical and professional manner at all times and observe the highest standards of integrity and fair dealing.
- Scouts must never ever give a player a lift in their vehicle. If the child is accompanied by their parent/guardian, then this is permissible as long as the player sits in the rear of the vehicle. Any scout who is unclear about this must contact the Safeguarding Service Manager and discuss their concerns with him directly.

DESIGNATED DRIVERS

- All those involved in the transportation of young people will be required to observe the requirements of the general code of conduct found at the beginning of this section, and also Safeguarding Children Procedures in addition to the following conditions.
- The Club recognizes that drivers are at risk of allegations. They are often transporting young people alone, sometimes at night and away from the Club’s main sites.
- It is therefore essential that drivers follow the requirements without interpretation or deviation and should any individual have any queries, they are advised to discuss these with the Academy manager or the Safeguarding Service Manager before they undertake any related duties. Any failure to comply with these requirements could constitute a breach of the terms of engagement and lead to action under the Club’s disciplinary procedures.
- As a member of the Club who is seen by the public most of their working day, it is essential for the driver to remember that they are seen as a representative of the Club at all times. It is important for them to always be dressed appropriately. If you wish to wear the Club’s tracksuit to work this is acceptable, the alternative would be a suit and tie. Please ensure that you have the correct attire by checking with the Academy manager or designated deputy.
- Given how drivers will be in close proximity to others, extra attention to personal hygiene is required with the driver being ‘presentable’

throughout their duties.

- All drivers are reminded that they must not consume alcohol within 8 hours of commencing their duties. When more than 8-10 units of alcohol have been consumed, this increases to 12 hours, as one unit of alcohol can take an hour to disperse into your system. If you are unsure about how much you may have consumed and whether you are safe to drive or not, please refer to the Department of Health website for guidance. If you are still not sure then you should refrain from your driving duties.
- Equally, it is the driver's responsibility to ensure they have had sufficient sleep to undertake their duties. Should some personal difficulty affect this, the driver must discuss this with the Academy Manager or designated deputy as to their suitability to undertake their duties.
- All drivers are reminded that it is illegal to use a mobile phone whilst driving and that any prosecution is against the individual not the organisation.
- No driver should ever make individual arrangements to transport any young person, whether associated with the Club or not, in any Club vehicle at any time. Equally, all Club based arrangements must be made by the Academy Manager or designated deputy and will be recorded by them. The driver is expected to contribute to these arrangements by advising on expected times/journey routes they will take and of any specific road difficulties they are aware of e.g. Traffic, road works, alternative routes etc.
- Occasionally the planned arrangements will need to be altered, but this will only be at the Academy Manager or designated deputy's direction and they will take responsibility to record this change.
- All drivers are required to advise the Academy Manager of any change to their own circumstances, which may have a bearing on their ability to undertake the tasks associated with being a driver for the Club. This means all medical and criminal situations, which the law requires the DVLA to be notified of, inclusive of speeding offences, temporary physical disability and the use of prescription drugs which advise against the use of machinery and driving while in use. Any failure to adhere to this will result in the Club taking action under the disciplinary process.
- Before commencing on any journey the driver must make a reasonable visual spot check of the vehicle being used to ensure it is safe to precede, once a driver starts their duties, legally it is the drivers responsibly to ensure the vehicle is safe to be driven. Should the vehicle appear unsafe in any way, the driver must immediately advise the Academy Manager or designated deputy, so alternative plans can be implemented.
- It is important for the driver to take all necessary contact numbers with them should the journey be delayed in any way and parents and host families etc. must be kept informed, regardless of the space of delay.
- In all circumstances and at all times, it is not acceptable for the driver to have a sole young person sit in the front of the vehicle, regardless of which vehicle is being used or how short the distance to be travelled.
- The only time it is permitted to have a young person in the front seats of a vehicle is when there are multiple passengers, in which case, the front seat passengers must in all circumstances be the first to vacate the vehicle. Therefore no one is left alone in the vehicle in the front seat as others are dropped off.
- Ensure all young people who are transported in your vehicle are wearing seatbelts. Eating and drinking should not take place in the vehicle to minimise the potential harm from choking, which can also distract the driver's attention. However, when another adult is present and the journey is lengthy this can be overridden.
- It is essential for the driver to take rest/comfort breaks on long journeys. Young people should be informed of these arrangements as part of the debrief before departure.
- The driver is responsible for any music played in the vehicle, either on the vehicle's stereo, or on young person's portable devices. The volume should be played at a level which doesn't affect the driver's concentration. Any young person behaving inappropriately will be reported to the Academy Manager or designated deputy on return to the Academy for sanctions to be applied. Any persistent offenders may have transport provision retracted.
- Under no circumstances ever, is the driver to threaten action, swear or in any way act inappropriately towards a young person. In circumstances where a child is seated far away from the driver and placing themselves or others at risk of significant harm, the driver may raise their voice to alert the person of potential dangers.
- If the driver is alone and any young person being transported interferes or attempts to interfere with the driver's ability to drive, the Club requires the driver to pull over at the nearest safe place and contact the Academy Manager or designated deputy to seek support and direction. If this is not possible, and there is a genuine concern for anyone's wellbeing, then the assistance of the police should be sought immediately. If the police are in attendance, then the driver must contact the Academy Manager or designated deputy or the Safeguarding Service Manager as soon as possible.
- In the event a journey is interrupted by an incident, accident or breakdown, the driver must immediately contact the Academy Manager or designated deputy for advice and guidance. The Academy Manager or designated deputy will then take the appropriate action, which may include attending the scene or sending another officer to support the situation.
- If the driver is unable to continue with their duties as a result of the incident, then the Academy Manager or designated deputy will take responsibility for the young people and the resolution of their journey needs.

MEDICAL AND HEALTH PERSONNEL

Birmingham City Football Club acknowledges that all disciplines within the scope of the medical professional role will have their own professional code of conduct and are therefore governed by either individual professional bodies or the General Medical Council. However, those medical personnel at Birmingham City Football Club are still required to comply with the Club's codes of conduct and best practice principles in respect of written information, interviewing or treatment of young players.

The medical personnel will be involved in all trialist inductions and will have the sole responsibility for securing medical information, which they will retain in a secured and strictly confidential filing system and adhere to the requirements of the Data Protection Act 1989; inclusive of revised updates in 1998 and 2003.

In particular, those personnel involved in the induction process are required to ensure that they have gained informed consent to interview and provide treatment before it is required. The medical personnel must remember that no player should be offered an appointment time without the parent or responsible parent being informed, and wherever possible, involved.

If a player is injured, medical personnel must at all times confirm in writing that the parent or responsible adult has been advised of the proposed treatment or other planned injury management, ensuring any action is recorded. If a parent or responsible adult does not wish the Club to treat, advise or take any action in respect of an injury caused while playing football at BCFC Academy, then this must be recorded and reported immediately to the Academy manager. If the parent or responsible adult advises what alternative/s they intend to pursue, then this again must be recorded and relayed to the Academy Manager.

If the medical professional has any concerns that the young player may not receive appropriate alternative medical attention, then they should advise the Academy Manager and the Safeguarding Service Manager immediately of their concerns. Jointly, a written referral to their general practitioner can be sent. If any other concerns exist regarding the actions of the parent or responsible adult, the Academy Manager and Safeguarding Service Manager will consider the possibility of a Child Protection referral been submitted to the Local Authority.

Medical professionals are required to discuss any safeguarding concerns they may have with the Head of Safeguarding, either before they make a referral, or whilst the referral being made.

The Club fully respects the confidentiality of the relationship between the player and medical professional. However, if the player discloses information which is suggestive of abuse, either towards them or to another player, then the Club expects the medical professional to follow the Local Authority guidance and involve the Safeguarding Service Manager in the referral process.

VISITING OFFICIALS & REFEREES

Birmingham City Football Club expects all visiting teams and officials to conduct themselves in an appropriate manner and within the guidelines provided to them by the Premier League and English Football League rules.

Any Birmingham City Football Club personnel who have concerns regarding the conduct of any visiting official, must make their concerns known immediately to the Safeguarding Service Manager so that action may be taken. In his absence, immediately, contact must be made with the first available Safeguarding Officer or member of staff.

The person who has concerns must gather as much information regarding the concern, so as reports are clear and accurate for their respective governing body.

PARENT AND PLAYER CODE OF CONDUCT

Birmingham City Football Club expects all parents and players to conduct themselves in an appropriate manner and within the guidelines provided to them by the Football Association and English Football League.

Anyone in attendance at a Birmingham City Football Club event or site who have concerns regarding the conduct of any parent or player, must make their concerns known immediately to the Safeguarding Service Manager so that action may be taken. In his absence, immediately, contact must be made with the first available Safeguarding Officer or member of staff.

The person who has concerns must gather as much information regarding the concern, so as reports are clear and accurate.

All parents and players will receive a copy of the Parent and Player Code of Conduct which includes a Declaration Form which must be signed and returned to the Club.

The Club endorse a behaviour model which supports the Player Code of Conduct. This is SAFETY, LEARNING and RESPECT also abbreviated SLR. Any player who breaches one or more of these values will be subject to further action by the Club.

Moderate behaviours will be redirected by staff in an appropriate manner and players are actively encouraged to regulate their own emotions. In rare circumstances when players exhibit behaviours which are somewhat escalated to an unmanageable level, they may be asked to take a break from the program so as appropriate interventions can be devised then implemented. This may well include parent and player input where appropriate. In more severe situations players may be suspended and/or permanently excluded from the Academy/Club.

NON OR LATE COLLECTION OF CHILDREN

IF CHILDREN ARE NOT COLLECTED AT THE END OF A MATCH OR TRAINING SESSION

Guidelines

In the event of a parent/carer failing to collect their child after a match or training session, the following procedure must be followed.

Under no circumstances must a child be allowed off-site or left unsupervised.

All possible attempts must be made to contact the parent/carer using Emergency Contact Numbers.

If contact cannot be made with parent/carer or approved emergency contact, the coach **must** contact Wes Hughes, Safeguarding Manager, the Police Child Protection Unit or Social Services for advice. See Section for Contact details of Designated Safeguarding personnel.

THEN: -

- Reassure the child that they will be safe and remain with Club Staff until an appropriate adult or family member is present to collect them.
- The coach **must** record the telephone contact made including the name and position of the person contacted
- Continue to try to contact the parent/carer and emergency contacts
- Continue to seek advice from the Police/Social Services
- Keep senior Birmingham City Football Club staff informed of the situation, including the Safeguarding Manager
- Prepare a full written report for the Safeguarding Manager
- Should it be necessary to transport the child home (with the permission of the parent/carer), it is preferable for two members of staff to accompany the child. The child **must** sit in the rear seat of the vehicle.

SECTION FIVE

SAFEGUARDING ADULTS AT RISK POLICY

- RULES & REGULATIONS
- AIMS & PRINCIPLES
- HUMAN RESOURCES
- DISCLOSURE BARRING SYSTEM (DBS)
- RESPONDING AND RECORDING CONCERN
- ADULTS AT RISK
- CODES OF PRACTICE
- YOUTH PRODUCED SEXUAL IMAGERY
- INTERNET SAFETY
- GUIDANCE ON U18 PLAYING IN THE 1ST TEAM
- ACADEMY TRANSPORT POLICY
- APPENDIX I - SAMPLE IMAGES INFORMATION LETTER

INTRODUCTION

Birmingham City Football Club acknowledges and accepts it has a responsibility for the wellbeing and safety of all adults at risk who are under the care or using the Club's facilities. It is the duty of all adults working on behalf of Birmingham City FC in any capacity to safeguard the welfare of adults at risk and by creating an environment that protects them from harm under the Safeguarding Vulnerable Groups Act 2006.

The wellbeing of adults at risk is paramount for all staff and accordingly, it is the responsibility of HR to make staff aware of the Safeguarding Adults at Risk Policy as part of their induction process. Where appropriate, the following guidelines will be supplemented by in-service training and additional guidance.

An "Adult at risk" is defined as anyone aged 18 or over who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

RULES & REGULATIONS

The Club is governed by the rules and regulations set out in the Safeguarding Vulnerable Groups Act 2006. The Club is fully committed to ensuring that the best practice recommended by these bodies is employed throughout. The Club also has a responsibility to maintain regular dialogue with the relevant services and are compliant with Government legislation.

AIMS & PRINCIPLES

The aims of the Club's Safeguarding Adults at Risk Policy are:

- To safeguard all adults at risk who interact with the Club's activities.
- To demonstrate best practice in the area of safeguarding adults at risk.
- To develop a positive and pro-active welfare programme to enable all adults at risk to participate in an enjoyable and safe environment.
- To promote high ethical standards throughout the Club's activities.

The key principles underpinning this policy are:

- Safeguarding the adults at risk welfare is, and must always be, the paramount consideration.
- All adults at risk have a right to be protected from abuse regardless of their age, gender, disability, culture, language, racial origin, religious beliefs or sexual identity.
- All allegations of abuse will be taken seriously and responded to efficiently and appropriately.
- To ensure that coaches, parents and other adults who come in contact with adults at risk display positive behaviours.

SAFEGUARDING ADULTS AT RISK

The Club has a Safeguarding Services Manager who has overall responsibility for the safeguarding of adults at risk taking part in Club activities. The Safeguarding Services Manager assumes overall responsibility, and is the focal point for safeguarding. Anybody with a concern about an adult at risk's welfare should contact a Safeguarding Officer for advice in the first instance – details can be found at the end of this policy. In addition, there are some links listed below.

- <https://www.local.gov.uk/topics/social-care-health-and-integration/adult-social-care/making-safeguarding-personal>
- <https://www.anncrafttrust.org/>

HUMAN RESOURCES

RECRUITMENT

As part of the Club recruitment and selection process, offers of employment to positions which involve working adults at risk are subject to a satisfactory statement of declaration, DBS disclosure and appropriate references. See below for details of the Club DBS procedures.

STAFF TRAINING

All staff working in direct contact with children shall be required to complete the FA workshop on Safeguarding children & adults at risk. Details of those satisfactorily completing this course are retained by the Club. In addition staff will receive in-house safeguarding training, delivered by the Head of Safeguarding.

HEALTH AND SAFETY

The Club Health & Safety and Risk Assessment Policy gives guidance to those whose roles involve working with adults at risk. Where an adult at risk is involved, a risk assessment must take account of their particular additional needs. The risk assessment should set out what arrangements are in place for their care and supervision, examples of such risk assessments are kept with the Clubs Operations Manager.

STAFF BRIEFING

A briefing Note giving guidance to all employees is available during the initial staff induction. Whenever possible staff are advised to operate accompanied when operating in isolated areas.

DISCLOSURE AND BARRING SERVICE (DBS)

The Club is registered with the Disclosure & Barring Service (DBS) through TMG. The DBS provides a disclosure service for organisations. DBS disclosures enable employers to undertake more thorough recruitment and selection procedures for positions which involve working with children and adults at risk. Staff are given detailed instructions which explains how to process an application via the links below.

- <https://gbg.onlinedisclosures.co.uk/Registration/Registration>
- www.gov.uk/db

PROCESS FOR DBS CHECKING

New Appointments

All staff who are offered a position which involves working with children and adults at risk will be required to undertake a statement of declaration and enhanced DBS Disclosure. All employment offers are subject to the outcome of the screening process and when applicable, this is set out in their Offer of Employment. Until such time as their Disclosure certificate has been received, the member of staff will not be left unsupervised with children and adults at risk.

The Club is committed to the equal opportunities of its staff and therefore if a positive Disclosure is received it will not result in an instant dismissal from employment.

Should a positive Disclosure be received, a risk assessment will be carried out by the appeal panel, to assess the information contained within the Disclosure Certificate. The member of staff may also be asked to attend an interview prior to an employment decision being made.

New appointments who already have a Disclosure Certificate

In the case of casual employees, if a new member of staff has been DBS checked by their previous employer, the Club may not ask that person to undertake another check. However, the original Disclosure Certificate must be shown to the SAFEGUARDING SERVICES MANAGER and it must be dated within six months of the employee's start date.

Existing Staff

Priority is being given to those who come into contact with adults at risk. All staff who have unsupervised access with adults at risk have been DBS checked.

Temporary Staff and External Consultants

The Club will ensure that all temporary staff and external consultants sign a 'Self Declaration Form' and will not have unsupervised access to adults at risk during their employment with the Club.

Data Protection

The Data Protection policy adopted by the Club is in line with current legislation.

Parental Consent

The Club will obtain parental or carer consent for all activities using the FA template for parental consent form. The Club will be vigilant and seek to minimize risk so as to safeguard adults at risk.

Adults at risk who are not picked up on time

The Club has procedures in place for adults at risk whose parents/carers do not collect them from an activity at a specified time. All parents/carers are made aware that the adult at risk should be met no later than 30 minutes after an activity has finished.

Should the adult at risk not be collected within 15 minutes, staff have emergency contact numbers, however communication with the Ticketing and Community office can be sort to obtain alternative numbers if necessary. In the event that an adult at risk is not collected on time, a minimum of 2 staff will wait at the venue until the parent/carers arrives or will escort the adult at risk home. If there is no responsible adult available to care for the adult at risk, staff should contact police/social care (numbers listed below)

DBS

In accordance with the procedures detailed above, all staff undergo a DBS check every 3 years.

Activities for Disabled Persons

The Club carries out all activities for disabled persons under the guidelines of the Equal Opportunities Policy and in accordance with the Club's Equal Opportunities Policy.

RESPONDING AND RECORDING CONCERNS

HIGHLIGHTING CONCERN

Although the Club is committed to doing the utmost to safeguard adults at risk from harm there may be an occasion when concern is raised. Abuse and neglect' are generic terms encompassing all ill treatment of adults at risk as well as cases where the standard of care does not adequately meet the health or developmental needs. Adults at risk may be abused or suffer neglect through the infliction of harm, or through the failure to act to prevent harm. Abuse can occur in a family or an institutional or community setting. The perpetrator may or may not be known to the adult at risk.

RECOGNITION – SIGNS OF ABUSE

There are five main forms of abuse identified as follows, should you have any concern that abuse is occurring you should contact a Safeguarding Services Manager immediately.

PHYSICAL ABUSE

Physical abuse may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm to an adult at risk. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness.

SEXUAL ABUSE

Sexual abuse involves forcing or enticing adults at risk to take part in sexual activities, not necessarily involving a high level of violence whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative acts such as rape or oral sex or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. Sexual abuse may also include non-contact activities, such as involving adults at risk in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging them to behave in sexually inappropriate ways or grooming an adult at risk in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males, women can also commit acts of sexual abuse.

NEGLECT

Neglect is the persistent failure to meet the basic physical and/or psychological needs, likely to result in the serious impairment of health and

development for example: not providing adequate food, clothing, shelter (including exclusion from home or abandonment). Neglect may occur during pregnancy as a result of substance abuse.

Some measure

- Protect a adults at risk from physical/emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers) or
- Ensure access to appropriate medical care/treatment

It may also include neglect of basic emotional needs.

EMOTIONAL ABUSE

Emotional abuse is the persistent emotional ill treatment of a adults at risk such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a adults at risk they are worthless or unloved, inadequate, or valued only so far as they meet the needs of another person. It may include not giving the adults at risk opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on adults at risk. These may include interactions that are beyond the adults at risk's developmental capability, as well as over protection and limitation of exploring and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

BULLYING

Bullying is not always easy to define and can take many forms. The three main types are: physical, verbal and emotional including Cyber bullying causing adults at risk to feel frightened or in danger, or the exploitation or corruption of adults at risk.

For more detailed information on the five main forms of abuse refer to The Football Association Safeguarding Children & Adults at Risk Procedures and Practices Handbook.

RESPONDING TO A REPORT OR SUSPICION

Where possible the Safeguarding Services Manager should be contacted as early as possible, however it is recognised that an individual may need to respond to a situation immediately. With this in mind the following guidelines offer help and support in responding to abuse or a suspicion of abuse:

Do:

- Treat any allegations extremely seriously and act at all times towards the adults at risk as if you believe what they are saying.
- Tell the adults at risk they are right to tell you.
- Reassure them that they are not to blame.
- Be honest about your own position, who you have to tell and why.
- Tell the adults at risk what you are doing and when, and keep them up to date with what is happening.
- Take further action – you may be the only person in a position to prevent future abuse.
- Write down everything said and what was done, sign and date.
- Seek medical attention if necessary.
- Inform parents/carers unless there is suspicion of their involvement.

Don't:

- Make promises you cannot keep.
- Interrogate the adults at risk – it is not your job to carry out an investigation – this will be up to the police and social services, who have experience in this.
- Cast doubt on what the adults at risk has told you, don't interrupt or change the subject.
- Say anything that makes the adults at risk feel responsible for the abuse.

DOING NOTHING IS NOT AN OPTION, IT IS YOUR RESPONSIBILITY TO ACT – Make sure you tell the Designated Person (DP) immediately, they will know how to follow this up and where to go for further advice.

RECORDING ALLEGATIONS OR SUSPICIONS

The Safeguarding Services Manager will ask for a written factual statement from the person making the report.

If the report involves an allegation about another member of staff, that person will also be asked to write a brief report, sign and date it. Any statement made by the adults at risk should be reported in their own words, signed and dated. These reports should be confined to facts and should not include any opinion, interpretation or judgement.

The Club will ensure that any adults at risk concerned is immediately removed from any possible risk of harm.

Investigations into possible abuse will require careful management. The Safeguarding Services Manager should seek the advice of The Football Association Safeguarding Children & Adults at Risk Team, Social Care Children's Duty team, LADO (Local Authority Designated Officer) or the Police before setting up an internal inquiry and take their advice on informing the child or young person's parents. In any case of suspected abuse, as soon as the local Social Care Department has been informed, the Club must provide a report to the FA Safeguarding Service Manager Children & Adults at Risk.

CONFIDENTIALITY

There is always tension and caution around issues of confidentiality. The advice for all staff at the Club is that no guarantee of confidentiality can be given to a adults at risk but in a safeguarding adults at risk protection incident confidentiality is over ridden.

A adults at risk should never be pressured to give information or show physical marks unless they do so willingly. If they chose to show markings, two members of staff should be present.

There are actions which staff have to and are obliged to take once we are aware of a problem. Undertakings of confidentiality should not be given either to the person making the allegations or to the person being interviewed. A matter is confidential on a need to know basis and nobody should have any reservations about referring a safeguarding adults at risk issue to the Safeguarding Services Manager at the Club. The key issue is that the welfare of the adults at risk is protected.

CONTACT DETAILS

Jessica Addicott
Head of Safeguarding
The Premier League
Tel: 020 7864 9000

Wes Hughes
Head of Safeguarding
Birmingham City FC
E: wes.hughes@bcfc.com
M: 07843 419222

THE FOOTBALL ASSOCIATION / NSPCC SAFEGUARDING CHILDREN & ADULTS AT RISK HELPLINE
T: 0808 800 5000

TEXTPHONE FOR DEAF USERS T: 0800 056 0566

West Midlands Police:
T: *Emergency 999 Non Emergency 101*
E: <https://www.west-midlands.police.uk/contact-us>

For further advice and information on the FA Safeguarding Children & Adults at Risk Guidelines, please visit www.thefa.com/goal

ADULTS AT RISK WITH SPECIAL NEEDS AND/OR DISABILITIES

MEDICAL INFORMATION – BEST PRACTICE

Within the Safeguarding Policy the Club identifies the need for a medical and consent form completed by the parent or carer.

This is also an opportunity to include any other individual needs or difficulties. Players and their parents and carers should be encouraged to complete this section honestly – disability or other health needs does not necessarily prevent someone participating in football, indeed football is committed to making the game accessible to everyone and will take positive steps to ensure every effort is made to meet those needs.

In order for players to have confidence in this Policy and be honest the Club will endeavour to identify and promote role models within the game. In addition players will be assured that with full information they will be better able to ensure that the player will be able to meet their full potential and not compromise their health thereby increasing the time they are able to enjoy playing football.

The Club has a medical form that gathers the required information with additional information on any changes in the adults at risk life situation that may cause a change in behaviour e.g. death of a relative, divorce.

Remember, some disabilities such as asthma may require minimal or no specific action by the Club's staff. However, the knowledge of that disability will allow staff to have an awareness of what action to take in an emergency i.e. a severe asthma attack brought on by an injury or incident.

ASSESSMENT OF NEED – BEST PRACTICE

From the information received on the medical form, and through discussion with parents or carers, the Club staff can identify how to best meet the adults at risk needs to enable them to access the football in full.

Below are some points to consider in completing an assessment of need:

- Does the Club/venue have adequate access for the adults at risk?
- Does the Club/venue have the required facilities?
- When playing away matches does the host Club have required access/facilities?
- Does the Club have the required staff trained?
- Does the young person need additional help from a “support person” to access the Football?
- What aids are required and can the Club provide them. Do the parents have aids that can be used? I.e. specialist wheelchairs (charities can help with this).
- Does the adults at risk need personal care and if so who will provide it? Medication – see above
- What advice can the parent/carer give to avoid/deal with possible problems in behaviour?
- What, if any, support services are provided by the local authority or other agencies to enable them to participate in everyday activities including education? Ask for consent from the parent/carer to seek advice or support from these sources
- How will the Club ensure the disabled adults at risk is safeguarded from harm or injury while in the venue?
- Is an agreement with parents on attending the venue during sessions required?
- What action should be taken if a medical emergency occurred relating to any disability?

It has to be recognised that some medical conditions can be hard to manage in a mainstream Club if they place other members at risk of harm. Such decisions to exclude or refuse membership must be taken in line with appropriate guidance from the Club's SAFEGUARDING SERVICES MANAGER and the Safeguarding guidance. In some cases specialist Clubs such as Wheelchair Clubs may provide the best solution.

DIFFERENT TYPES OF DISABILITY – STAFF GUIDANCES

Chronic illness

Among the more common are asthma, allergies, diabetes, epilepsy, sickle cell anaemia or thalassaemia. Being diagnosed with a chronic medical condition presents many challenges for both the disabled child and their families. For parents, having access to information, treatment options and related resources such as football, can make a significant difference in their quality of life. Health issues such as severe asthma, diabetes and epilepsy, are likely to require the adults at risk to have regular medication.

The Club Welfare Officer and appropriate coaches must be aware of what medication is prescribed as well as what action to take if the disabled adults at risk becomes unwell. The Club must ensure that, while supporting the disabled adults at risk and parent or carer, they do not overstep what is appropriate for the Club to undertake in terms of care.

Knowledge of what to do and how to cope in an emergency is always important but it may be considered necessary that, in order to safeguard the young person, a parent or other responsible adult should always be in attendance.

For those illnesses where reaction time is vital, a plan should be developed with the disabled adults at risk and parent/carers to deal with emergencies so that a clear line of action and responsibility can be followed.

It may be appropriate, only with the expressed permission of the individual concerned and their parent or carer to share some information in order to raise awareness and challenge myths and fears among their peers or Club staff.

For example, a young person with diabetes may be required to inject insulin and they may prefer to make this explicit to their peers rather than risk being caught injecting insulin with the risk of misguided assumptions about drug abuse! Safe arrangements should be made for storage of medication if the parent/carers is not present throughout activities.

Autistic Spectrum Disorders (ASD)

There are a group of lifelong developmental disabilities, affecting how a person relates to or communicates with other people. Adults at risk with Autistic Spectrum Disorders experience difficulties known as “the triad of impairment – social interaction, social communication and imagination”.

The National Autism Society recognises that “the prevalent rate of ASD of 1 in 110 indicates that all services should expect to come into contact with adults at risk on the spectrum”. In football we need to recognise that ASD can cause problems not only for the individual concerned but for both fellow team members and coaches that are involved with them. It has to be remembered that this is not an issue of “poor behaviour” but a behaviour pattern that is part of ASD.

The Club will need to look at what they can and can’t provide to meet an individual adults at risk needs and complete a risk assessment with a decision on whether that risk is acceptable and manageable, and allows the Club to safeguard the needs of both the individual concerned and the Club members to whom the Club has a duty of care.

Attention Deficit Hyperactivity Disorder (ADHD) & Tourette’s Syndrome

Attention deficit hyperactivity disorder (ADHD) and attention deficit disorder (ADD) refer to a range of behaviours associated with poor attention span including impulsiveness, restlessness and hyperactivity, as well as inattentiveness, and may make it more difficult for adults at risk/disabled persons to learn or obey instructions and also cause misunderstandings when socializing. Tourette’s syndrome is often linked to or part of the symptoms of ADHD. Tourette’s may cause adults at risk/disabled persons to use inappropriate and verbally abusive words in an uncontrolled and unintentional manner. The Club will need to liaise with parents/carers and possibly professionals who help the player outside the Club to draw up a plan to support the player within the Club. The plan will need to be agreed by all concerned, e.g. coaches, parents and the adults at risk/disabled persons.

Learning Disabilities

Adults at risk with learning disabilities may require more help to learn new skills. Coaches need to be made aware of the player’s disability so that they understand that the adults at risk may need more help to participate in training sessions and games. It is important that parents communicate with the Club to prevent assumptions being made that the adults at risk is being disruptive or naughty.

Progressive or Potentially Terminal Illnesses

With adults at risk with progressive illnesses such as cancer, it is important to ask open questions that will allow the adults at risk and their parents or carer to share information openly about any progressive illnesses that may be active or in remission but could have an impact in

terms of possible health and safety issues. Progressive illnesses by their very nature are likely to change with time. The adults at risk’s ability to take part in activities may become more limited and more specialist provisions may be required to enable them to take part. For example a adults at risk being able to maintain his/her involvement with the Club for as long as possible may be of primary importance following a diagnosis of a potentially terminal illness such as cancer.

Learning Disabilities UK - www.Learningsisabilitiesuk.org.uk

National Autism Society - www.nas.org.uk

Tourette’s Syndrome (UK) Association - www.tsa.org.uk

The British Dyslexia Association - www.bdadyslexia.org.uk

Attention Hyperactivity Deficit Disorder - www.adhd.org.uk

Asthma UK – www.asthma.org.uk

British Deaf Footballs Council – www.britishdeaffootballscouncil.org.uk

Diabetes UK – www.diabetes.org.uk

National Deaf Adults at risk/disabled persons’ Society – www.ndcs.org.uk

EFDS Head Office – www.efds.co.uk

Mencap Football – www.mencap.org.uk

USE OF IMAGES

The Club takes its guidance on the use of images from guidelines issued by the FA, Premier League and English Football League. All photographs are taken by persons who have been briefed by the Activity Manager responsible for the activity being photographed.

- Before taking photographs of adults at risk and children, parental/carers consent is sought in writing prior to the event. Parents/carers are responsible for informing the head coach of any change of circumstances which may affect consent.
- Parents and carers will be informed of how the image will be used. The head coach will not allow an image to be used for something other than that for which it was initially agreed.
- All adults at risk and children featured in publications will be appropriately dressed.
- Where possible, the image will focus on the activity taking place and not a adults at risk or children.
- Designated photographers will undertake a DBS check, attend a Safeguarding Adults at Risk workshop and will be personally responsible for keeping up to date with the latest guidelines on the use of Images. Identification should be worn at all times
- Adults at risk or children who are under a court order will not have their images published in any document.
- No images of adults at risk or children featured in publications will be accompanied by personal details such as their school or home address.
- Any instances of inappropriate images in football should be reported to a member of staff or responsible guardian and from there the Safeguarding Service Manager at the Club must be informed.

CODE OF PRACTICE

1. What are images of adults at risk? Why have a Code of Practice?

Images are all photographs taken on film or digital cameras (including mobile phones) and all sorts of moving pictures.

There has been much talk about whether it is safe to have images taken of adults at risk participating in sport. Whilst the great majority of images are appropriate and are taken in good faith, it is a fact that images can be misused and adults at risk can be put at risk if common - sense procedures are not observed.

2. Aims of the Code of Practice

First, as in all matters concerned with the adults at risk, the aim is to help the Club projects establish and develop good practice.

Second, the Code will help the Club projects avoid three potential sources of abuse.

- The use, adaptation, or copying of images for child abuse, either on the Internet or in print. www.ceop.gov.uk
- The possible identification of a child when an image is accompanied by significant personal information which can lead to the adults at risk

being 'groomed'.

- The identification and locating of adults at risk where there are safeguarding concerns. Such cases would include, for example, adults at risk who could be compromised by an image because:
 - o they are removed from their family for their own safety
 - o there are restrictions on their contact with one parent following a parental separation
 - o they are a witness in criminal proceeding

3. The Code of Practice – general considerations

The Club should:

- communicate as widely as possible their approach to the recording of images, saying that its policy is designed to encourage best practice in the safeguarding of adults at risk and to prevent abuse if possible
- make sure parents, carers and adults at risk are told about the Club Social Media Policy before the adults at risk participates in an Activity
- get parents' or carers' consent to take images of the adults at risk for the purposes of the Activity.
- report any instances of inappropriate images to the contacts listed at Paragraph 3 of this document.

The Club should not:

- publish images with the full name(s) and details of the individual(s) in their programme or place images containing that information either on their website or in the press
- use an image for something other than that which it was initially agreed, e.g. published in the press when initially produced for a personal commemorative picture
- allow images to be taken by anyone in changing rooms, showers and toilets or anywhere else where adults at risk might be undressed.

The Club should remember:

- it is not an offence for someone to take appropriate photographs on public property, even if asked not to do so
- it cannot decide who can and can't take images on public property
- it can decide who can and can't take images on private property. If photographers do not comply with these requirements, then they may be asked to leave

4. The Code of Practice – the photographers

The aim of each photographer should be to help celebrate and promote football.

When taking an image, they should be asked to

- focus on the activity rather than the individual adults at risk
- include groups of adults at risk rather than individuals if possible
- ensure all those featured are appropriately dressed (a minimum of vest or shirt and shorts)
- represent the broad range of adults at risk participating in football - boys and girls, disabled people, members of minority ethnic communities. Sept 2018

YOUTH PRODUCED SEXUAL IMAGERY POLICY

The purpose of this document is to inform and introduce Policy and Procedure for the management of incidents relating to the production and sharing of sexual images by young persons (formerly known as sexting). A football club may encounter this situation from a number of areas within the organisation. These may be within an Academy setting with young players or Academy parents seeking guidance. Elsewhere in retail or catering it may be young members of staff sharing images or it could be in an engagement setting or school provision with the Community Trust Department. This is not an exhaustive list and it is wise to be prepared in order to be able to deal with the issue anywhere where it should arise.

THE CURRENT POSITION

The sharing of sexual images made by young people and sent to young people is a major issue in society.

Sharing photos and videos online is part of daily life for many people, enabling them to share their experiences, connect with friends and record their lives.

Photos and videos can be shared as text messages, email, posted on social media or increasingly via mobile messaging apps, such as Snapchat, WhatsApp or Facebook Messenger.

90% of 16-24 year olds and 69% of 12-15 year olds own a smart phone giving them the ability to quickly and easily create and share photos and videos.

This increase in the speed and ease of sharing imagery has brought concerns about young people producing and sharing sexual imagery of themselves. This can expose them to risks, particularly if the imagery is shared further, including embarrassment, bullying and increased vulnerability to sexual exploitation. Producing and sharing sexual images of under 18s is also illegal.

A 2016 NSPCC/Office of the Children's Commissioner England study found that just over one in ten boys and girls (13%) had taken topless pictures of themselves (around one in four of those were girls) and 3% had taken fully naked pictures. Of those who had taken sexual images, 55% had shared them with others. 31% of this group had also shared the image with someone that they did not.

Although most young people aren't creating or sharing this type of imagery, the potential risks are significant and there is considerable concern about the issue.

Research conducted by 'The Key' found that 61% of its secondary school head teacher members reported 'sexting' as a concern. This placed it higher than drugs, obesity and offline bullying in terms of frequency of reporting as a concern.

Research within education similarly found that 78% of parents were either fairly or very concerned about youth produced sexual imagery, compared to 69% who were concerned about alcohol misuse and 67% who were concerned about smoking.

Although the production of such imagery will likely take place outside of Clubs, these issues often manifest in organisations working with children and young people. As such, concerns may arise and it is our responsibility to ensure they are dealt with appropriately.

Our football club need to be able to respond swiftly and confidently to ensure that children are safeguarded, supported and educated. Much of the complexity in responding to youth produced sexual imagery is due to its legal status. Making, possessing and distributing any imagery of someone under 18 which is 'indecent' is illegal. This includes imagery of yourself if you are under 18.

The relevant legislation is contained in the Protection of Children Act 1978 (England and Wales) as amended in the Sexual Offences Act 2003 (England and Wales). It is an offence to possess, distribute, show and make indecent images of children.

The Sexual Offences Act 2003 (England and Wales) defines a child, for the purposes of indecent images, as anyone under the age of 18. This will clearly include the majority of our Academy players but may also involve our over 18s who have taken images of their younger partner etc.

‘Indecent’ is not defined in legislation. When cases are prosecuted, the question of whether any photograph of a child is indecent is for a jury, magistrate or District Judge to decide based on what is the recognised standard of propriety.

Young people who share sexual imagery of themselves, or peers, are breaking the law. It is not for our staff at the club to decide.

The police may, however, need to be involved in cases to ensure thorough investigation including collection of all evidence (for example, through multi-agency checks), and there are incidents which should always be referred to the police

Even when the police are involved, however, a criminal justice response and formal sanction against a young person would only be considered proportionate in certain circumstances.

The National Police Chiefs Council has worked with the college of policing to produce new operational advice for law enforcement relating to the investigation of youth produced sexual imagery offences. This will help enable local police services to develop a coordinated, effective, proportionate response in this area with safeguarding at its heart.

Where the police are notified of incidents of youth produced sexual imagery they are obliged, under the Home Office Counting Rules and National Crime Recording Standards, to record the incident on their crime systems. The incident will be listed as a ‘crime’ and the young person involved will be listed as a ‘suspect.’

This is not the same as having a criminal record

However, there have been concerns that young people could be negatively affected should that crime be disclosed, for example, on an enhanced Disclosure and Barring Service (DBS) check.

To mitigate this risk, the NSPCC have worked with the Home Office and the Disclosure and Barring Service and provided policing with a new way of recording the outcome of an investigation into youth produced sexual imagery. **This is called Outcome 21.** Where the police are notified of incidents of youth produced sexual imagery they are obliged, under the Home Office Counting Rules and National Crime Recording Standards, to record the incident on their crime systems. The incident will be listed as a ‘crime’ and the young person involved will be listed as a ‘suspect.’

This is not the same as having a criminal record.

However, there have been concerns that young people could be negatively affected should that crime be disclosed, for example, on an enhanced Disclosure and Barring Service (DBS) check.

In order to mitigate the risk to Birmingham City Football Club we have the following in place.

1. An Acceptable use of i.t. policy for staff.
2. Clear guidelines not to befriend young people connected with the club on social media.
3. Staff can use their own mobile phone to text young people connected with the Club in the age specific Whats App groups. (Whats App for over 12 year olds only and to follow the guidance of the football club). The Whats App groups are for general information sharing specific to the learning environment and should only be used for this purpose. The groups are set-up by the Head of Coaching Stuart English and he has oversight. Parents must sign an agreement for their child to use the Whats App Groups.
4. Filtering devices on club IT and regular examination of usage Procedures for how to deal with youth produced sexual imagery.

POLICIES AND PROCEDURES AND GOOD PRACTICE

Explanation of terms and definitions.

The term Youth produced sexual imagery’ best describes the practice because: ‘Youth produced’ includes young people sharing images that they, or another young person, have created of themselves. The previous term of sexting was not clear and often created confusion about its legality.

‘Sexual’ is clearer than ‘indecent.’ A judgement of whether something is ‘decent’ is both a value judgement and dependent on context.

‘Imagery’ covers both still photos and moving videos (and this is what is meant by reference to imagery throughout the document).

POLICIES AND PROCEDURES

This policy shall deal with:

1. A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18
2. A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult
3. A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18

This policy does not cover:

The sharing of sexual imagery of people under 18 by adults as this constitutes child sexual abuse and staff must always inform the Head of Safeguarding or the police. Follow the club guidelines in the Birmingham City FC Safeguarding Children Policy.

This Policy applies to all staff, employees and volunteers

Any incident as described previously shall be referred as soon as possible to
The Club Head of Safeguarding

or

The Academy Safeguarding DSO or the Community Trust Safeguarding DSO.

If a staff member is responsible the Head of HR must also be informed as soon as possible

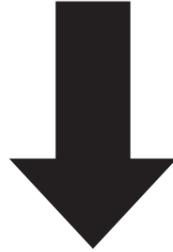
Young people should be reminded that possession of youth produced sexual imagery is illegal. They should be informed that if they refuse or it is later discovered they did not delete the image they are committing a criminal offence and the police may become involved. All of these decisions need to be recorded; including times, dates and reasons for decisions made and logged in the safeguarding records. Parents and carers should also be informed unless this presents a further risk to the young person.

Young people should be reminded that possession of youth produced sexual imagery is illegal. They should be informed that if they refuse or it is later discovered they did not delete the image they are committing a criminal offence and the police may become involved. All of these decisions need to be recorded; including times, dates and reasons for decisions made and logged in the safeguarding records. Parents and carers should also be informed unless this presents a further risk to the young person.

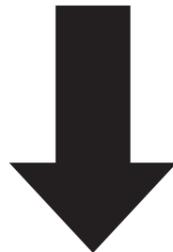
As with all child Safeguarding disclosure or should you discover a concern

1. Remain calm.

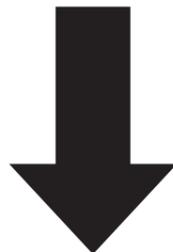
2. Reassure the young person that you will deal with the matter and ensure they are safe.
3. Reassure that you will treat the matter in confidence but inform them you will have to share the matter.
4. Record as soon as possible your actions and what the young person may say.
5. Inform the Head of Safeguarding or Departmental Safeguarding DSO.



The Head of Safeguarding must carry out a meeting with the staff involved and must record the matter and formulate an action plan.



There should be subsequent interviews with the young people involved (if appropriate) and an incident report form should be completed



Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.
 At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to children's social care and/or the police immediately.
 All members of staff shall be made aware of how to recognise and refer any disclosures of incidents involving youth produced sexual imagery. This shall be covered within staff training and referred to in the Clubs child protection/safeguarding policy.

The initial review meeting must consider the initial evidence and aim to establish:
 Whether there is an immediate risk to a young person or young people

Consideration must be given as to whether a referral should be made to the police and/or children's social care

Consideration must be given it is necessary to view the imagery in order to safeguard the young person – in most cases, imagery should not be viewed

The information recorded must note:

The names and address of those involved.

Their ages and dates of birth.

Schools attended and family details.

Any relevant facts about the young people involved which would influence risk assessment

Establish whether the imagery has been shared widely and via what services and/ or platforms.

What devices have been used? Though this may be unknown.

Whether immediate action should be taken to delete or remove images from devices or online services

Consideration must be given to whether there is a need to contact a school, college, another setting or individual.



An immediate referral to the police and/or children's social care should be made if at this initial stage:

The incident involves an adult

There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example special educational needs)

or

What you know about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent

The imagery involves sexual acts and any young person in the imagery is under 18

You have reason to believe a young person is at immediate risk of harm owing to the sharing of the imagery, for example, the young person is presenting as suicidal or self-harming

If none of the above apply then The Club may decide to respond to the incident without involving the police or children's social care (The Club can choose to escalate the incident at any time if further information/concerns come to light).
The decision to respond to the incident without involving the police or children's social care would be made in cases when the Head of Safeguarding or departmental lead is confident that they have enough information to assess the risks to the young person/people involved and the risks can be managed within the Club's disciplinary framework and if appropriate local network of support.

Guide to Risk Assessing

If a young person has shared imagery consensually, such as when in a romantic relationship, or as a joke, and there is no intended malice, it is usually appropriate for the Club to manage the incident directly. In contrast any incidents with aggravating factors, for example, a young person sharing someone else's imagery without consent and with malicious intent, should generally be referred to police and/or children's social care. If you have any doubts about whether to involve other agencies, you should make a referral to the police



When assessing the risks the following should be considered:

- Why was the imagery shared? Was the young person coerced or put under pressure to produce the imagery?
- Who has shared the imagery? Where has the imagery been shared?
- Was it shared and received with the knowledge of the young person in the imagery?
- Are there any adults involved in the sharing of imagery?
- What is the impact on the young person involved?
- Does the young person involved have additional vulnerabilities?
- Does the young person understand consent?
- Has the young person taken part in this kind of activity before?

Securing and handing over devices to the police

If any devices need to be seized and passed onto the police then the device(s) should be confiscated and the police should be called. The device should be turned off and placed under lock and key until the police are able to come and retrieve it.



Children's social care contact and referrals

Where the Head of Safeguarding or Departmental Safeguarding Lead are aware that children's social care are currently involved with a young person involved in an incident of youth produced sexual imagery then they should contact children's social care. They should also contact children's social care if they believe they may be involved, or have been involved with a young person in the past. If as a result of the investigation they believe there are wider issues which meet the threshold for children's social care involvement then they should make a referral in line with their child protection procedures. (Sandwell, Birmingham, Solihull or Walsall)

Sandwell, Birmingham, Solihull and Walsall use Multi-Agency Safeguarding Hubs (MASH) so this will be the most appropriate place for the club to initially make a referral.

Viewing Imagery

Adults should not view youth produced sexual imagery unless there is good and clear reason to do so. Wherever possible responses to incidents should be based on what DSOs have been told about the content of the imagery. The decision to view imagery should be based on the professional judgement of the DSO and should always comply with the child protection policy and procedures of the Club. Imagery should never be viewed if the act of viewing will cause significant distress or harm to the young person.

If a decision is made to view imagery it should only be with the agreement of the Head of Safeguarding or following guidance from the Police would need to be satisfied that viewing:

It is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the young person or parent in making a report is unavoidable because a young person has presented an image directly to a staff member or the imagery has been found on a Club device or network.

Guidance to all staff.

Never copy, print or share the imagery; this is illegal

Viewing is to take place if it is the only way to make a decision about whether to involve other agencies (i.e. it is not possible to establish the facts from the young people involved)

Discuss the decision with the Head of Safeguarding or Police

Ensure viewing is undertaken by the Head of Safeguarding or another member of the safeguarding team with delegated authority from the Head of Safeguarding or the Police.

Ensure viewing takes place with another member of staff present in the room, ideally the SSM or a member of the senior leadership team.

This staff member being informed of the matter finding the imagery does not need to view the images again. Wherever possible ensure viewing takes place on Club premises

Ensure wherever possible that images are viewed by a staff member of the same sex as the young person in the imagery.

Record the viewing of the imagery in the Club's safeguarding records including who was present, why the image was viewed and any subsequent actions

Ensure this is signed and dated and meets the wider standards set out for recording safeguarding incidents.

If the Club has decided that other agencies do not need to be involved, then consideration should be given to deleting imagery from devices and online services to limit any further sharing of the imagery.

Always seek advice on this point

It is recommended that in most cases young people are asked to delete imagery and to confirm that they have deleted the imagery. Young people should be given a deadline for deletion across all devices, online storage or social media sites.

Young people should be reminded that possession of youth produced sexual imagery is illegal. They should be informed that if they refuse or it is later discovered they did not delete the image they are committing a criminal offence and the police may become involved.

All of these decisions need to be recorded; including times, dates and reasons for decisions made and logged in the safeguarding records. Parents and carers should also be informed unless this presents a further risk to the young person.

Training and Learning for staff and young people

Staff training in this very challenging area shall take place throughout the football club on a regular basis.

The Community Trust, Stadium, Women's Team, Regional Talent Centre and Academy Staff shall all be made aware of the policies and procedures and shall feature in the Continual Professional Development of all staff

All Academy players and scholars shall receive training and guidance in this matter. The Head of Education at the Academy shall be responsible for ensuring that this training takes place and is recorded against the players' development and training record

It shall be made clear to all staff members and young people at the club that Birmingham City FC will view any such incident as a very serious matter and may have far reaching consequences for the continued employment of staff members or the retention of young footballers.

Any such actions by the club shall be in accordance with employment law, club policies and the guidance from football authorities

This guidance and policy is in accordance with National Legislation and guidance from the Premier League, EFL and the Football Association

PROFESSIONAL PHOTOGRAPHERS AND THE CLUB STAFF

DESIGNATED ADULTS AT RISK PHOTOGRAPHERS

One or more professional photographers engaged by the Club who take images of adults at risk engaging in specific activities should be listed as Designated Adults at Risk Photographers.

To achieve this:

- The Club should invite them to apply for inclusion in their list of Designated Adults at Risk Photographers, explaining to them that they will be screened and trained by them on safeguarding children matters before they are placed on the list.
- The Club should screen applicants for their suitability (just as they would check any other member of staff or volunteer working with adults at risk) and then provide training for them in their Safeguarding Adults at Risk policies and procedures.

THE DESIGNATED ADULTS AT RISK PHOTOGRAPHER'S INSTRUCTIONS

The Designated Adults at Risk Photographer (whether a professional photographer or member of Staff) should receive clear instructions, preferably in writing, which outlines acceptable practice.

- The Club should provide them with a clear brief about what is appropriate in terms of content - images should not be allowed to be taken outside the activity being covered.
- The Club should determine who will hold the images recorded and what is to be done with them.

PARENTS, RELATIVES, FRIENDS AND THE ADULTS AT RISK THEMSELVES

Parents, relatives and friends may want to take their own images of “their” adults at risk at the Activity - and the adults at risk too may want to take his/her own record.

It should always be made clear to them that no image taking at all is permitted in adults at risk changing rooms, showers and toilets and that, in connection with this, all mobile phones carried by adults at risk must be switched off in such accommodation.

In other activities, it is very difficult to control image taking by parents/carers etc but good practice can be encouraged by the provision of simple written information given to everyone.

The Club should decide whether, when and how parents, carers, family, friends should be permitted to take images of the adults at risk.

SAFEGUARDING FOR THE INTERNET AND OTHER E-TECHNOLOGY

Staff/Volunteers/ Parents'/Carers'

1. Know what your adults at risk are doing online and who they are talking to. Ask them to teach you to use any applications you have never used. It is advised that they cover their webcam when online as hackers now have the ability to intrude and get access to your environment without invitation.
2. Help your adults at risk to understand that they should never give out personal details to online friends — personal information includes their messenger ID, email address, mobile number and any pictures of themselves, their family or friends. If you're adults at risk publishes a picture or video online, anyone can change it or share it. Remind them that anyone may be looking at their images and one day a future employer could!
3. If your adults at risk receives spam/junk email & texts, remind them never to believe them, reply to them or use them. It's not a good idea for your adults at risk to open files that are from people they don't know. They won't know what they contain — it could be a virus, or worse — an inappropriate image or film.
4. Help your adults at risk to understand that some people lie online and therefore it's better to keep online mates online. They should never meet up with any strangers without an adult they trust and ideally this should be in a public place.
5. Always keep communication open for a adults at risk to know that it's never too late to tell someone if something makes them feel uncomfortable.
6. Teach them how to block someone online and how to report them if they feel uncomfortable.

For further information, please look at www.ceop.gov.uk and www.ThinkUKnow.co.uk

Advice adapted and acknowledged: Childnet: www.childnet.com

It's important to recognise that social sites are fun and offer great possibilities for adults at risk. However, there are potential risks including cyberbullying, inappropriate sexual contact with children and young people and the misuse of personal information.

Social networking sites, alongside sites which enable users to put up their own pictures, text and videos (known as user-generated content) such as YouTube, blogging sites, and interactive games sites for example are part of a social and technological revolution that is known as Web 2.0. Web 2.0 is characterised by the ease with which anyone can produce and publish their own content and link with others.

Adults at risk especially like this new environment because they can have a powerful voice to express their identity and opinions and many are using it to good effect. For example, some musicians and bands have launched themselves entirely on the strength of this new stage and all this is for free and with just one password.

Social networking sites, such as Twitter, Instagram and Facebook, are very popular with adults at risk. These types of sites allow adults at risk to be incredibly creative online, keep in touch with their friends and express themselves using a whole range of different media and applications such as video, photos, music, and chat.

Increasingly adults at risk are able to access and use these applications on the go through mobile and gaming devices, where they are away from supervision, enabling the instant publishing of pictures.

What sometimes appears as a private space for a adults at risk can become public very quickly and this blur between public and private expression can potentially put a adults at risk at risk in two main ways:

It is not easy talking to a young person about their social networking online or offline. Adults at risk often think of these sites as their private domain, in much the same way as they would a personal diary and address book. However because of the public nature of this environment and because young people have been hurt by inappropriate behaviour in these spaces, it is important that they understand the risks and are able to safeguard themselves with the help and support of others.

SAFE: Keep safe by being careful not to give out personal information — such as your full name, E-mail address, passwords, phone number, home address, photos or school name — either to people you are speaking with online or by posting it online where other people can see it.

MEETING: Meeting someone you have only been in touch with online can be dangerous. Only do so with your parents' or carers' permission and even then only when they can be present and ideally in a public place.

ACCEPTING: Accepting e-mails, Instant Messenger (IM) messages, or opening files, pictures or texts from people you don't know or trust can lead to problems — they may contain viruses or nasty messages!

RELIABLE: Information you find on the internet may not be true, or someone online may be lying about who they are.

TELL: Tell your parent, carer or a trusted adult if someone or something makes you feel uncomfortable or worried, or if you or someone you know is being bullied online.

GUIDANCE ON SENIOR APPEARANCE OF U18S

With acknowledgement to the English Football League.

FOREWORD – U18 DEBUT

If an U18 player gets the opportunity to play in the First Team, or under 23s it probably feels to him like the many years of training and coaching have resulted in him achieving his ultimate footballing ambition.

A senior team match is not an activity specifically designed for players U18 therefore some safeguards should be considered, however these will not be as stringent as if you are planning for an activity which is wholly targeted at players U18 years. When inviting a young player under 18 to a senior or first team game you should consider all the risks and put in place some safeguards.

In general terms, open age football is for anyone over the age of 16 years. As an employer you have a 'duty of care' to ensure that you put in place safeguards to protect those young people who are under 18 and who, in law, are still considered to be a child.

Questions have been asked in the past regarding those travelling to an away game, for example, *"When a player U18 is staying overnight at a hotel as part of the senior team, does everyone travelling need a Disclosure and Barring Service (DBS) and must the First Team Manager have a DBS when a player who is U18 is involved in a First Team game?"*

The answer to both questions is **NO**.

If the debut of the young player is going to occur during an away game, then good practice would be to ensure that one person travelling has a DBS certificate. Changes to the DBS means that the certificate is now workforce specific. This means that the document will state if the person has clearance for work with the children's workforce or for work with the adult workforce. Those medical professionals who work with both adults and with U18s will require '**child and adult workforce**' on their DBS certificate. Generally speaking, the Club physio is likely to already have an existing CRB or new DBS certificate.

Speaking with the player, his parents and all other interested parties, before any debut, would ensure that all of those involved will know what to expect, especially if the team is travelling to an away game. It is important to ensure that everybody understands that no single person is solely responsible for the care of the young player. Safeguarding is everyone's responsibility. Therefore, all of those involved should be made aware of their personal responsibilities when a young player is making his debut for the first team. Whilst this guidance is written around a debut appearance, the principle will apply for more regular senior appearances. Note: The younger the player is, the more vulnerable he may be.

Additional vulnerabilities to consider include:

1. the excitement and anxiety of playing for the first team or senior squad;
2. his keenness to do well and to impress and please the manager, coaches and team;
3. travelling to an away game as the only U18;
4. wanting to be one of the 'grown-ups', but being cautious and reminded of the code-of-conduct for U18s.

This Toolkit has been designed to help Designated Safeguarding Officers and those involved in the selection process to prepare and think things through in advance in order to support your Club in safeguarding their young players on their debut. This guidance provides information on good working practices which will be regularly reviewed and, where appropriate, improvements made. Suggestions to improve working practice and safety are welcomed from any source. The information contained in this document has been developed to help Clubs support the transition of young players into the adult game. Ensure you read through the whole document before making any plans.

Step 1 - Talking to parents

Talk to parents outlining some of the issues detailed in a) – e) below then follow up with a letter enclosing a consent form. Ask the parents to sign and return the consent form. Template examples of a letter to parents, a consent form and Code of Conduct are enclosed as Appendix 1- 3.

a) Outline what a great achievement it is that that their son has been offered the opportunity to debut with the First Team. If the match is an

away game, explain that they are likely to be the only U18 travelling (if that is the case). Explain that they may have been called up, but that does not automatically mean they will actually play on the day.

- b) Explain that you understand that their son may be thrilled at the prospect of playing but you are aware that he may be nervous and even a little anxious. Also, tell them that you will be speaking to him (or have already done so) to reassure him and ensure he is comfortable and knows what to expect.
- c) Explain that if away travel is involved he will be in a hotel room alone and will not be sharing with any of the other players. The only exception to this would be if two U18s are travelling with the team, in which case they can share a room.
- d) Explain that you intend to 'buddy up' their son with one of the senior players. Seek their support, explain that you would like them to talk to their son to prepare him and try to ensure he knows that this is a great opportunity and he should enjoy it. They should reinforce the fact that if he is uncomfortable about anything he should talk to someone he trusts.
- e) Explain that the reasons you are going through this process with them is to try to ensure that everything goes as smoothly as possible for his potential first team appearance.

Step 2 - Talking to the player

It is highly likely to have been the Academy Manager or First Team Manager who has informed the player that he has been called up. The information in a) – g) below is a follow up conversation which should be undertaken by the Safeguarding Services Manager or by another appropriate person who the player knows and trusts. Therefore, the timescales for talking to players and parents may be interchangeable.

- a) Congratulate the player on being selected to join the first team squad. Explain that he may have been called up, but that does not automatically mean he will actually play on the day. Be diplomatic in preparing them for this possible disappointment.
- b) Discuss with the player that while you understand that he must be very proud at the prospect of playing, you also understand that he may be nervous and even a little anxious.
- c) Explain that you will try to identify a 'Buddy' for him, and this may be a senior player who can provide support for him during his possible debut. Ask him if there is someone he thinks he would feel comfortable with. However, be clear that this may not necessarily be the person who is identified as his 'Buddy'.
- d) Explain to the player that he does not have to tolerate any unacceptable 'banter' or behaviour and that he needs to set his own boundaries and know what 'line' must not be crossed personally. Explain that there may quite a bit of 'down-time' and he should think about what he takes with him to fill the time.
- e) He also needs to know that if the team are travelling to an away game, he will be staying in a separate hotel room and should not share a room with any adult over 18.
- f) Outline what is expected of him in respect of a 'code of conduct'. That is what his personal responsibilities are during the trip. This includes, specifically, ensuring that he understands he must have no access to alcohol (including the mini-bar); no access to adult television or any adult materials; he should not engage in gambling; that he should use any social media platform in a responsible manner, in line with any Club policy and must be careful about comments which may be misinterpreted or insulting to others in any way; clarify that he must not make any inappropriate comments about the football environment. The Club may have additional responsibilities to add to this list.
- g) Ensure the player, knows and understands that if he has ANY concerns he can speak to his 'Buddy', or someone else that he trusts.

Step 3 - Talking to the 'Buddy'

The Safeguarding Services Manager will need to identify who may be the most suitable 'Buddy' for the young player. You may need to seek advice on this from the Academy Manager or other members of staff. Remember, however, to be sensitive when making a decision on this

issue. The idea is to try to support the player through a well-planned transition and not to create an environment where he 'stands out more' and is the focus of more attention.

Also remember the 'Buddy' should be someone that the player will feel comfortable with, however, it should be one of the senior players.

When you talk to the 'Buddy', it is important to stress that they are not responsible for the care of the young player. You are simply asking them to be a sympathetic ear, if required, and a mentor for the young player.

Step 4 - Talking to the person with the DBS Disclosure

As stated earlier a First Team or Development Squad Match is not an activity designed for U18s, therefore DBS/CRCs are not required by all of the adults involved. However, to provide additional safeguards, one member of the support team should have an FA CRB DBS certificate and be cleared through The FA for work in football. Generally, the Club physio may hold an appropriate disclosure.

When you talk to the person with the appropriate DBS, it is important to stress that they are not solely responsible for the care of the young player during any trip. The young player will not need constant independent supervision. You are simply asking them to be available for the young player, if required.

Young people over 16 years of age are often capable and legitimately entitled to live independently. A one night stay in a hotel room alone is something young players may already have done as part of family holidays.

Step 5 - Talking to the Manager and the team

Realistically, it may be only a few days before a game when you are informed that a young player is going to be called up. Therefore, the best approach for ensuring everyone knows and understands their responsibilities when a young player is called up is to ensure that as DSO you address this issue during an in-house safeguarding training session.

Through well planned training and using this guidance as part of a Club education programme, you should be better prepared for last minute confirmations of call-up which may occur a couple of days before an important game.

When delivering training, the key message would be:

- a) Young players U18 are defined in law as children and adults working with children need to not only protect those young players, but to also demonstrate standards of behaviour which do not leave the adults open to allegations against themselves.
- b) If the game involves away travel, players U18 should be in a hotel room alone and should not share with an adult over 18.
- c) An exception to this would be if two U18s are travelling with the team, in which case they can share a room.
- d) Players and staff should not encourage young players U18 to engage in any inappropriate activities such as gambling; the use of alcohol or other inappropriate or illegal substances; or watching or engaging in any inappropriate adult behaviour.
- e) Regardless of what experiences they, as experienced older players, encountered in the past, especially on their debut for the first team, players and all staff should recognise the vulnerability of young players U18 and the risks associated with encouraging young players to engage in inappropriate activities.
- f) It is important to remember that the younger the player, the more vulnerable they will be.
- g) The best way to inspire young players to play well and fulfil their potential is to provide encouragement and praise, especially during times of challenge and anxiety, such as on their debut for the first team. Providing positive role models in the form of more experienced players who demonstrate appropriate behaviour can help the player and the Club.

All staff that work with young players are in a position of trust. Young players, parents and carers must have confidence that any professional football Club working with children will ensure that they provide a professional, trained workforce that understand their roles and responsibilities when working with U18s.

Planning and preparing for the time when U18s will be called up for a first team or senior appearance can only help to provide protection for; the players U18, the senior players, the Club, the business and The Brand. It will also provide reassurance for families that their son will be provided with the right guidance and support during his development.

ADDITIONAL CONDITIONS OF PLAYER LOAN AGREEMENT

- 1) THE PLAYER RECEIVES WEEKLY FEEDBACK FROM THE COACHING STAFF ON HIS DEVELOPMENT AND PERFORMANCE. THIS IS DONE THROUGH A FORMAL MEETING WITH A MEMBER OF COACHING STAFF.
- 2) THE LOAN MANAGER 'MARK SINCLAIR' AT BCFC HAS A WEEKLY CONVERSATION WITH COACHING STAFF FROM THE 'LOAN CLUB' REGARDING THE PLAYERS DEVELOPMENT AND PERFORMANCE.
- 3) ACCESS IS PROVIDED FOR THE LOAN MANAGER OR OTHER STAFF TO VISIT AND OBSERVE TRAINING AND FACILITIES INCLUDING ACCOMODATION AND ALL OTHER PLAYER WELFARE ARRANGEMENTS.
- 4) WHERE POSSIBLE VIDEO FOOTAGE OF THE PLAYERS PERFORMANCE IS SENT TO BCFC PERFORMANCE ANALYSIS DEPARTMENT, IF INDIVIDUAL CLIPS CAN BE PROVIDED THIS WOULD BE APPRECIATED BUT A MINIMUM REQUIREMENT IS A COPY OF THE GAME.
- 5) ALL BCFC PLAYERS WILL BE PROVIDED WITH AN INDIVIDUAL TECHNICAL/TACTICAL PROGRAMME WHEN THERE IS NO MIDWEEK GAME. IT IS EXPECTED THAT SUPPORT IS GIVEN TO WORK ON THIS PROGRAMME OR THE PLAYER IS ALLOWED TO RETURN TO BCFC TO FACILITATE THIS.
- 6) ALL BCFC PLAYERS WILL BE PROVIDED WITH INDIVIDUAL PREHABILITATION AND STRENGTH AND CONDITIONING PROGRAMMES. IT IS ESSENTIAL THAT THE PLAYER FOLLOWS THE PROGRAMME AS REQUIRED AND THE NECESSARY SUPPORT AND TIME IS PROVIDED WHILST HE IS ON LOAN.
- 7) ALL BCFC PLAYERS RECEIVE NUTRITIONAL ADVICE HENCE IT IS EXPECTED THAT SUITABLE NUTRITIONAL ARRANGEMENTS ARE MADE. ACCESS TO BREAKFAST AND LUNCH IS REQUIRED.
- 8) ACCOMODATION AND TRANSPORT ARRANGEMENTS ARE SUITABLE AND MEET THE REQUIREMENTS OF BCFC. THESE ARE CHECKED WITH THE LOAN MANAGER WHO LIAISES WITH THE BCFC SAFEGUARDING OFFICER 'WES HUGHES'. THIS IS PARTICULARLY SIGNIFICANT IF THE PLAYER DOES NOT DRIVE AND ESPECIALLY IN THE CASE OF AN U18 PLAYER.
- 9) IF THE PLAYER IS U18 OR STILL CONTINUING WITH AN ACADEMIC PROGRAMME SUPPORT HAS TO BE PROVIDED TO ALLOW THE PLAYER TO CONTINUE TO DEVELOP IN THIS AREA. IT MAY BE THAT THE PLAYER ATTENDS BCFC TO FULFILL THIS OR THE EDUCATION PROVISION IS PROVIDED BY THE CLUB. THESE ARRANGEMENTS WILL BE MADE WITH THE HEAD OF EDUCATION AND WELFARE.
- 10) WHEN THE OPPORTUNITY ARISES FOR EXAMPLE: NO MIDWEEK OR SATURDAY GAME THE PLAYER RETURNS TO BCFC FOR A REVIEW AND CHECK UP. THIS WOULD BE EXPECTED TO BE FOR A MINIMUM OF 1 DAY, PREFERABLY 2 AND SHOULD HAPPEN AT LEAST ONCE EVERY 6 WEEKS .

Further support on safeguarding issues:

Wes Hughes

The Safeguarding Services Manager 'BCFC'

Mob: 07843 419222

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Mark Sinclair

The Head of Education and Welfare 'BCFC'

Mob: 07500 822981

Email: mark.sinclair@bcfc.com

Alexandra Richards

The English Football League Safeguarding Manager

Mob: 07792 284740

FA/NSPCC 24 hour helpline for advice on Tel: 0808 800 50000

APPENDIX 1 – TEMPLATE EXAMPLE PARENTS' LETTER

Date:

Dear Parent/Guardian,

We are delighted to inform you that your son, (name) has been selected to join the first team squad this weekend in the match against ///////////////. We are looking forward to having // with us for the match, but we want to ensure we put appropriate safeguards in place as he is still under 18 years of age.

Please complete the consent form attached to this letter and return it to the Designated Safeguarding Officer (contact details below) as soon as possible. An electronic copy with your typed signature will suffice.

This is a fantastic opportunity and we hope he really enjoys the experience. It is important to remember that being called into the squad does not automatically mean that he will play on this occasion; however, he should be congratulated on this achievement at such a young age. If he does not play on the day, we hope you can reassure him of how well he has done by being selected.

We understand that your son may be nervous and even a little anxious with this new and exciting challenge. In order to support him through this we are hoping to put a few things in place and we hope that you will also talk a few things through with him before the game.

We intend to identify a senior player who will act as a mentor and will 'buddy up' with your son. This is to provide him with someone he can turn to if he needs advice or support. It would be helpful if you discussed with him what a great opportunity this is, that he should try to enjoy the experience but that if he is uncomfortable about anything or has any concerns then he should talk to his 'buddy' or someone he trusts.

If the game involves away travel he will be in a hotel room alone and will not be sharing with any of the other players. The only exception to this would be if two U18s are travelling with the team, in which case they will share a room.

We will also be providing your son with a Code of Conduct which we expect him to adhere to. This is just to outline standards of behaviour which the Club expects of players U18 when placed in an adult environment. It would be helpful if you could support this guidance and reinforce the requirements of the Club.

We know this is a great occasion for // and wish him luck with the opportunity and challenge.

Yours sincerely,

(Name & title)
(Mob: Email contact DSO)



APPENDIX 2 – TEMPLATE EXAMPLE - U18 FIRST TEAM APPEARANCE CONSENT FORM

(NAME OF CLUB) CONSENT FORM

Congratulations to you and your son: he has been selected to join the senior squad in a forthcoming match against (name of Club). In order that your child may participate in this fixture we are seeking your consent and support in preparing him for the game. It is essential that you complete and return this form to (name of person and contact details), supplying relevant information and your consent as parent/legal guardian.

- By consenting to this I am stating that my child is in good health and that he is not participating contrary to medical advice.
- In the unlikely event of an accident occurring, I give my permission for a designated representative of the Club to authorise emergency medical treatment, including the use of anaesthetic if deemed necessary.
- Appearance as part of the senior squad will include TV and use of photographs/digital images. A separate images consent form should have been signed by you at the start of the season/contract, if not ensure you speak to the DSO to request that consent form also.

Player/Child's name Date of birthAge

Name of parent/guardian: Relationship to child:

Address:

Emergency contact telephone no. Mobile tel:

Please provide a second emergency contact name and telephone number:

Name Relationship to child

2nd Emergency contact telephone no. Mobile tel:

Please note: It is essential that we are able to contact one of these two numbers in the event of an emergency.

If your child has any medical conditions that may need to be taken into account, please give details below. The following information will assist the party leaders in caring for your child.

Special dietary needs:

Does your child suffer from: Asthma Hayfever Diabetes Epilepsy Nut Allergy

Any other allergies (e.g. Penicillin/nuts/anaesthetic)

Please add any other relevant information:

Important information to parents: The use of any regular medication by a professional player must be reported to the Club medical team to ensure that anti-doping regulations are met. You must inform the team manager of the use of any medications including over the counter purchases.

I consent to my child participating as a member of the first team/senior squad on this occasion **and for the rest of the season or scholar contract if required.**

Signature: Date:Please write your name in full

Office use only: Ensure a copy of this is given to the Designated Safeguarding Officer and a copy kept on the player file.

APPENDIX 3 – TEMPLATE EXAMPLE - CODE OF CONDUCT U18 PLAYER SENIOR APPEARANCE

Congratulations on being selected to join the senior squad for the forthcoming match against. When representing the Club at a senior level we expect certain standards of behaviour and we have outlined below a code of conduct which we expect you to maintain.

- Represent the Club in a manner and to a standard expected by a professional football Club.
- Recognise that whilst being invited into the squad, you may not be selected to play on the day. Understand that the Manager's decision is final and that any response to any such decision will be that expected of a professional footballer.
- Understand that you must not engage in any inappropriate adult activity and that you must not consume alcohol; access adult literature of any kind or engage in gambling whist with the first team.
- Agree to only use any social media platform in a responsible manner and not post any comments which may be misinterpreted or are insulting to others in any way, including making inappropriate comments about the football environment.

This is an exciting and challenging time for you, however it is important that you understand that if you have any concerns you can speak to someone you trust or to the manager.

- We hope to identify a 'Buddy' who will act as a mentor for you. If you need advice or support he will be available to provide this.
- It is critical that you understand that you do not have to tolerate any unacceptable 'banter' or behaviour. Know your own boundaries and don't be afraid to talk to someone you trust if you have any concerns.
- If you are travelling to an away game, you should be staying in a separate hotel room and must not share a room with any adult over 18. If there are two youth team players travelling, you may be expected to share a room.

If you have any concerns and would like to discuss these issues further then you can contact the Wes Hughes on 07843 419222
Enjoy the experience and good luck if you are selected to play during the match.

VULNERABLE GROUPS / YOUNG PERSON'S UK & OVERSEAS TRAVEL & TOURNAMENTS PROCEDURE

PURPOSE

To ensure that BCFC manage and assess the additional risks that may be presented by Vulnerable Groups / Young Person's undertaking travel and tournaments both in the UK and overseas. Where reasonably practicable BCFC will eliminate the risks, where this is not possible all risks are assessed, significant findings recorded and control measures put in place with the aim to bring the risks down to the lowest practicable level.

Risk assessment is an on-going business and should continue throughout the trip as the Management / Travel Organisers respond to situations and incidents during the course of the trip.

DEFINITIONS

- **Vulnerable Groups** - As defined under the Safeguarding Vulnerable Groups Act 2006
- **Young Person's** - Young Persons are a term used for a group of 'people' who are below the age of 18. However, this is further broken down into two key areas;
 - o A Young Worker – who are below eighteen years of age and above the Minimum School Leaving Age (MSLA) – this age is the official age at which a person is able to leave school – and is usually just before or just after the persons 16th Birthday and;
 - o A child – a person who is under the MSLA.
- **Travel Organiser** – For the purpose of this procedure, the person who shall ensure the travel arrangements are suitable and sufficient and that adequate up-to-date information is available so that correct decisions on travel and preparation can be made.
- **Local Management / agents** – For the purpose of this procedure, line management or BCFC approved agents based in, escorting or locally available in the country/workplace the young person is contracted and or undertaking work.

1. Procedure Planning and organisation / Informing parents / guardians and parental / guardian consent

1.1.1. There are some kinds of activity for which you would not normally ask specific parental / guardian consent, where when cost is negligible and/or when permission may be assumed simply by Vulnerable Groups / Young Person's being members of the Academy. For trips which are not residential, it is generally sufficient simply to inform parents / guardians about the trip by letter, whilst inviting them to contact you if they have any concerns about the arrangements.

The more major/ expensive/ lengthy/ unique the trip, the fuller the letter will need to be. For domestic residential trips it will also be necessary to add information on i.e. Accommodation (including information about security and supervisory arrangements) - Insurance cover provided or needing to be purchased by parents / guardians - A statement to the effect that in case of thoroughly unacceptable behaviour the Management / Travel Organisers reserves the right to return a young person home at parental / agency expense.

In the case of a major trip (e.g. a tournament or a tour abroad then parents may need to be invited to a meeting at which arrangements can be discussed in detail and parent / guardian may ask questions

1.1.2. The activities may be controlled by other managers / agents in the country visited through co-operative ventures. These are subject to the health and safety regulations of the country in question. Those managers / agents may have produced their own health and safety procedures, in communication with the BCFC Safeguarding Manager in the first instance and or the BCFC Health and Safety Officer, to which all employees adhere. Management / Travel Organisers where practicable, obtain such procedures in advance so that proper assessments and all necessary preparations are made, these are in addition to the requirements of the BCFC Club procedures and UK Health and Safety Law.

1.1.3. Management / Travel Organisers ensure that:

- An adequate risk assessment is made and that a safe system of operation is devised and advice sought from the BCFC Safeguarding Manager in the first instance and or the BCFC Health and Safety Officer where required.
- Proper organisational arrangements, including the full details of any external agents in situ are established and both the conduct and role of all concerned is clearly understood PRIOR to a party or individuals leaving.
- Individual employees and or leaders of groups that are travelling within the UK and or overseas are authorised, competent and, where necessary, qualified to undertake the activities they are expected to carry out and have previous experience of domestic and European Tours.
- All staff and or agents likely to interact, manage, supervise or escort Vulnerable Groups / Young Persons have been vetted and Enhanced DBS checked.
- All relevant BCFC staff have been issued with and read the FA Code of Practice for Tours and Tournaments. A copy of this is available on One Drive and staff must sign a declaration to confirm they have read and understood the guidance prior to the Tour.
- All relevant BCFC staff have been issued with and read the DFEE Health and Safety of Pupils on Educational Visits (A guide to good practice). A copy of this is available on One Drive and staff must sign a declaration to confirm they have read and understood the guidance prior to the Tour.
- Local 'living and working' conditions are explored sufficiently, commensurate with the likely risk.

- **Any domestic travel arrangements** are prepared as is reasonably practicable and include:
 - o Domestic transport to any UK airport is to be provided by club transport. This will be in the form of minibus. All club drivers are reputable and are employed as transport providers for the football club. The staff is reliable and is aware of Child Safeguarding issues. The drivers have been subject to DBS. Seat belts will be worn on all journeys.
 - o Domestic transport to any UK scheduled tournaments is to be provided by club transport or club approved transport providers. The drivers have been subject to DBS. Seat belts will be worn on all journeys.
- **Any Continental travel arrangements** are prepared as is reasonably practicable and include:
 - o Any flights / ferries / train tickets are arranged and booked so as to ensure that Vulnerable Groups / Young Person's and staff / agents are catered for as a 'group' and seating arrangements planned to ensure Vulnerable Groups / Young Persons are not located alongside 'others'. Onward coach transport from any airport to an arranged destination ensures that all coaches used are fitted with seatbelts and will be worn by all staff and students throughout any coach journey. A 'buddy' system will be utilised to lessen the risk of any child becoming separated from the party. Extra vigilance will be used at any comfort stops from venues. The Companies booked are suitably insured and all vehicles are considered lawful and roadworthy. Checks will be made by staff prior to the commencement of journeys.

1.1.4. Management ensure that they, or a designated person, act as a 'Travel Organiser' and in advance of the employees expected travel date:

- Contacts the Foreign Office and overseas contacts for any relevant travel advice.
- Obtains medical advice to determine necessary vaccinations, immunisations, first aid requirements, etc.
- Obtains information on climate, local culture and other local information, as appropriate.
- Obtains tickets, using authorised suppliers only, visas and any other necessary documentation for travel.
- Checks all participants have a valid passport
- Ensures that they complete the BCFC Travel Notification form and return it to the manager/travel organiser who will share a copy with the BCFC Academy Football Administration Work Placement (Alistair.chaplin@bcfc.com) as soon as they are aware of the travel requirement. Failure to do so may invalidate any insurance cover provided.
- Ensures adequate insurance cover is in place for groups and/or individuals that provides, as a minimum, the following: -
 - o Medical emergency and travel expenses
 - o Personal accident
 - o Personal liability
 - o Cancellation, premature return, rearrangement and replacement
 - o Baggage and personal effects
 - o Money and credit cards
 - o Hijack

1.2. Accommodation and general stay - Domestic and Continental

1.2.1. Management / Travel Organisers ensure they and any authorised external agents undertake proper accommodation arrangements,

including the full details of any booking agents in situ are established and will consider and ensure where reasonably practicable:

- o Upon arrival a risk assessment is undertaken and the fire arrangements understood and communicated to all parties. Evacuation routes and assembly points must be noted and the understanding of those routes and points by Vulnerable Groups / Young Persons affirmed.
- o Separate rooms are provided for staff and players when identified as reasonably practicable. That all rooms are en-suite and all shared and communal rooms will be checked and assessed by staff prior to occupation for suitability.
- o Where risk assessment identifies then consideration will be given to the removal of tea making facilities and irons. Pay TV will not be accessible for adult channels. There are no mini bars. If required, then lower floors to be utilised where possible. Access to balconies will be closely assessed and considered for any use. Checks will be made to the locking systems of the windows.
- o Where any gymnasiums and spa facilities are available they will be assessed on site for suitability and local Legionella and Water Safety Controls identified. If there is an outdoor Pool, then extreme caution is urged should you decide to allow use. Utmost vigilance must be taken and staff ratios to Vulnerable Groups / Young Persons must be identified and observed.
- o **Food Safety & Meal times** - Management / Travel Organisers must ensure that venues have a Food Safety Management System in place prior to travel. A separate local assessment will be made concerning meal times, service provision, cleanliness and hygiene provision (toilets, hand washing etc.). Consideration has been given to dietary needs, cultural requirements and any food allergies. Management and in-situ agents shall ensure that the Vulnerable Groups / Young Persons have an understanding of good hygiene practices and adhere to them to ensure any risk of stomach upsets, bugs and or virus are minimised.
- o **Medical Provisions** - All staff are to have undertaken accredited First Aid training. Medical consent forms have been completed for all Vulnerable Groups / Young Persons and all ailments and conditions have been notified to staff. Telephone numbers for nearest medical provision i.e. hospitals; dentist etc. will be obtained on arrival. Suitable liability insurance for the company BCFC must be in place. Vulnerable Groups / Young Persons to be advised, as with all tournaments, to supplement this with private travel insurance.
- o **Game and Training Venues** - All pitches and facilities must be assessed for safety and suitability. Any Rendezvous Points and local procedures for missing persons are discussed and understanding by all confirmed. A separate assessment to be made on any site upon arrival and throughout the tournament. Any risk with regard to the weather and environment to be made upon arrival.
- o **Recreational Time** - A thorough assessment of any recreational activity will be undertaken by Management / Travel Organisers and or any authorised external agents prior to commencement. Consideration to age, venue, suitability to health and safety will be paramount throughout.
- o **Climate** – Management / Travel Organisers shall consider climatic impacts prior to leaving and ensure suitable arrangements i.e. provision and use of Sun block/screen, head coverings and extra hydration, winter clothing, footwear etc. Local assessment of current climate conditions will be undertaken upon arrival and monitored throughout the trip.
- o **Miscellaneous** - Consideration is to be given to the diversity of the Vulnerable Groups / Young Persons and attendees at the tournament. Provision will be made for any religious, cultural or ethnic requirements. Consideration will also be given in any assessment to the specific cultural and social requirements of the area where the tournament is being undertaken.
- o All Vulnerable Groups / Young Persons will be issued with identification cards giving their name and the name of the accommodation. Contact numbers will also be displayed thereon.

1.2.2. Management / Travel Organisers ensure where local management are supervising staff and Vulnerable Groups / Young Persons, then they have the relevant skills, competency and knowledge to discharge fully the duties expected of them. This may include special training and instruction in advance of travel.

EQUIPMENT AND SPECIALIST CLOTHING

- 1.2.3. Management / Travel Organisers ensure that equipment, provided by BCFC, is checked and able to withstand the rigors of travel and is suitable for the conditions under which it is used.
- 1.2.4. Management / Travel Organisers ensure that protective clothing requirements, availability of appropriate storage and the transport and use of dangerous substances are considered when assessing the risks. If the equipment is not being taken from the UK, arrangements for the local procurement and the safe use of all necessary equipment is made.
- 1.2.5. Management / Travel Organisers and or Local Agents / Contacts ensure that full instructions and training is available for any

equipment to be used whether it has been provided by BCFC or not, and that proper visual safety inspections are performed before every period of use in accordance with the BCFC Work Equipment Procedure.

1.3. Health matters and emergency actions

1.3.1. Managers/Travel Organisers and those employees and Vulnerable Groups / Young Persons who intend travelling overseas on BCFC business use the BCFC Safeguarding Manager Wes Hughes in the first instance and or the BCFC Health and Safety Officer Dave Hoult for H&S advice and the further information available in the Travelling and Working Overseas Guidance Notes.

1.3.2. The BCFC H&S Officer recommends that all such individuals

- Obtain a copy of Health Advice for Travellers from any Post Office
- Seek advice of the local management / contacts regarding local conditions and requirements which will necessarily depend on standard of accommodation.
- Seek advice from the Foreign and Commonwealth Office, Travel Advice Unit, Consular Directorate, Old Admiralty Building, London, SW1A 2PA; t +44 (0)870 606 0290; f +44 (0)20 7008 0155; website - British Foreign & Commonwealth Office (FCO)
- Seek advice on medical and health from the Department of Health, Richmond House, 79 Whitehall, London, SW1A 2NL; t +44 (0)20 7210 4850; website - www.dh.gov.uk
- Obtain necessary vaccinations and immunisations either through GP or privately through a Travel Clinic unless specific arrangements have been made through the Club Medical Advisors.
- Ensure the employee is insured to travel – information on this can be obtained from Tim Smith Head of Academy Operations (Email: Tim.smith@bcfc.com)
- Obtain any 'Fit to Travel' medical, as required by some countries, through a GP and or through the Club Medical Advisors.

1.3.3. Managers/Travel Organisers ensure that at least one member of staff attending an overseas trip involving five or more persons is trained and holds a valid First Aid at Work Certificate. Further information available through the BCFC First Aid Procedure and Guidance Note.

1.3.4. Managers/Employees and or Local Agents ensure that any incident, accident, injury, unsafe act or condition is reported to the BCFC Safeguarding Manager in the first instance and or the BCFC Health and Safety Officer via the accident reporting process as detailed in the BCFC Incident Reporting Procedure and Guidance Notes.

1.3.5. Managers/Employees and or Local Agents ensure that any BCFC Significant Incident (SI) that happen in the UK or overseas and that might have an impact upon the whole of BCFC, its employees and reputation, is reported to Senior Management and BCFC Safeguarding Manager in the first instance and or the BCFC Health and Safety Officer as soon as possible. Further information can be found in the BCFC Significant Incidents Guidance Document.

1.4. Monitoring and review

1.4.1. Managers/Travel Organisers, where considered necessary, conduct a debriefing session following each and every trip. The information learned is then used to improve arrangements for future trips.

Certain matters are given consideration during the debriefing:

- Would the trip have progressed more smoothly?
 - o At a different time of year, different location or with different personnel?
 - o With better preparation, etc.?
- Were anticipated hazards encountered?
- Were adequate precautions adopted to counter the associated risks?
- In hindsight could they have been improved upon?
- Would the organisers repeat the exercise?
- Would changes be needed for any future similar work / trips overseas?

2. RELATED DOCUMENTS AND INFORMATION

BCFC Hazard Identification and Risk Assessment Procedure
 BCFC Reporting and Investigation Procedure
 BCFC First Aid Procedure
 BCFC Work Equipment Procedure

GUIDANCE NOTES

Hazard Identification and Risk Management Guidance Note
 Reporting and Investigation Guidance Note
 Travelling and Working Overseas Employees Guidance Note
 Travelling and Working Overseas Managers/Travel Organisers Guidance Note
 BCFC Significant Incidents Guidance Document
 First Aid Guidance

FORMS

BCFC Travel Notification Form
 BCFC Academy Transport Policy
 BCFC Consent Forms: an example version is included below

Working Safely Abroad Action Plan (Appendix 1 – Travelling and Working Overseas Guidance for Employees)

BIRMINGHAM CITY ACADEMY TRANSPORT POLICY

LAST REVIEWED OCTOBER 2018 BY WES HUGHES, SSM

INTRODUCTION

Birmingham City Football Club is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. All members of staff adhere to the safeguarding policy and procedures which are supported by the board of governors. All members of staff attend regular safeguarding courses and internal CPD to further enhance a safe environment for all young people and adults at risk for whom we support. One main area where the welfare of children and young people must be considered is when they are being transported as part of their Club activities.

The Club has developed this transport policy to provide staff, parents, carers and young players with all the information they need in terms of travel and transport during the working day or when carrying out Club duties. It is the responsibility of the Safeguarding Services Manager to ensure that this policy is communicated during pre-season induction sessions to all staff, parents/carers and young players, and to new starters throughout the season.

This policy has been developed to ensure that every consideration is paid to the welfare of young players who are under 18 years of age whilst on Club transport, whilst being transported by a Club member of staff, or whilst travelling independently to or from Club activities. This is particularly relevant to Apprentices due to the full time nature of their involvement with the Club. As the stadium, the training ground, the School and accommodation are all sited at different venues, arrangements have to be made for Apprentices to travel independently or to travel on Club transport.

Wherever possible and practical it is advisable that Apprentices and all players under the age of 18 travel in Club vehicles with a driver.

USE OF ACADEMY VEHICLES

- The vehicles are used for daily transportation to training, education and accommodation venues, on match days, to take players to medical appointments, and on trips and tournaments.
- This is also applicable to players on trial, loan and work experience to assist them with getting to and from the training ground whilst at the club on a temporary basis, with details confirmed via the Academy Recruitment Department.
- The vehicles are checked regularly and thoroughly by maintenance staff who complete a bi-weekly check sheet to include the safety of interior and exterior parts of the vehicles. When vehicles are used each time, a visual check before driving is also required. Any issues must be reported to the Transport Coordinator immediately. All the vehicles have breakdown cover.
- The vehicles are insured through the company insurance for all intended use which includes the transportation of young and professional players.
- For driving mini buses, staff must be in possession of a licence issued prior to 1997 or a separate mini bus license. In the event that training is needed for a member of staff to be able to drive a mini bus, the Transport Coordinator will arrange the necessary training and assessments (DVLA D1 minibuss assessment training) and keep a record of this on file.
- It is the Transport Coordinator's responsibility to secure a copy of all drivers' driving licenses, ensuring that drivers hold the appropriate license without any restrictions, with copies sent to the Club's Operations Director.
- It is the responsibility of the individual to advise the Transport Coordinator of any change in their medical or driving circumstances so that an assessment can be made to the continuing suitability of the individual to undertake the responsibilities of a driver. This will be in consultation with the HR department.
- Each journey undertaken must be recorded using a 'Vehicle Mileage Book' located in each vehicle – which outlines start and end destinations, mileage covered, drivers name and reason for journey.
- It is essential that when transporting apprentices, and all players U18, only the following vehicles are permitted to be used, as insured by

the club's travel insurance policy:

VEHICLE	REGISTRATION NUMBER	MAX NO. OF PASSENGERS (EXCL. DRIVER)	MIN. AGE PERMITTED TO DRIVE
VW Polo	BW66 ZCA	4	21
VW Touran	BG66 VWS	6	21
VW Touran	BG66 VWT	6	21
VW Touran	BX17 WCZ	6	21
VW Transporter (Kit Van)	MF16 VRJ	2	25
Ford Transit (Minibus)	YG62 HNH	16	25

TRANSPORTING APPRENTICES AND PLAYERS UNDER 18 (EXCEPTIONAL CIRCUMSTANCES)

In exceptional circumstances, staff can be authorized to use their own vehicle to transport apprentices, and U18 players, only if the appropriate insurance schedule and MOT certificate is received by the Transport Coordinator. In addition, consent must be provided by the Insurance Company via email or hardcopy, clearly stating that the insurance is adequate and in compliance with all legal requirements. In a circumstance where insurance cover/consent wasn't previously arranged, consent can be sort by phone then followed up by an email.

The decision to transport a child in a privately owned vehicle must meet a threshold where it is deemed safer to do so than not to do so. Some examples of exceptional circumstances would be non-collection of a child where a parent/guardian is unavailable to collect or if a child is in immediate danger, for example gang violence. Staff must ensure that where possible they are accompanied by another member of Staff. It is advised that players travel in the rear seats. Staff must make the Safeguarding Services Manager and Academy Manager aware of the transport arrangements and also the child's parent/guardian.

The Club cannot take any responsibility for players being transported in privately owned vehicles and therefore, advise staff to have business insurance for their vehicle, to declare to their insurers that they work within the Academy of a Professional Sports Club, and to make their insurer aware that this may involve the occasional transportation of young players. Staff are advised to ensure that their insurance cover would be adequate to transport young players.

TRANSPORTING APPRENTICES AND PLAYERS UNDER 18

- The Transport Coordinator is responsible for planning and approving all transport arrangements in relation to the Academy.
- Any unexpected journeys, or deviations from original journey, are to be reported to the Transport Coordinator.
- All those who will be involved in the transportation of any young person under the age of 18 will be required to have a clear DBS check and have undertaken the FA safeguarding course.
- Safeguarding procedures, inclusive of safe and best practice, mean that the Club expects that no member of staff, regardless of position, may transport any person under the age of 18 alone. In exceptional circumstances, it may be necessary for this to occur but this must only ever be at the direct discretion of the Transport Coordinator.
- It is the responsibility of the driver to ensure that all passengers are wearing a seatbelt.
- Staff must not offer lifts outside of normal working hours, unless this has been agreed by the Transport Coordinator and their guardian has consented.
- Staff must be fit to drive and free from any drugs, alcohol or medicine which is likely to important judgement or their ability to drive.
- Behave appropriately at all times.
- Where possible, be accompanied by another member of staff as this may significantly reduce the risk of distraction, accident, injury or

allegation of misconduct or abuse. The second member of staff can be responsible for directions, stops, head counts, checking seat belts are being worn, communications, and ensuring players are behaving appropriately.

- Where possible, be accompanied by another member of staff as this may significantly reduce the risk of distraction, accident, injury or allegation of misconduct or abuse. The second member of staff can be responsible for directions, stops, head counts, checking seat belts are being worn, communications, and ensuring players are behaving appropriately.
- No use of mobile phones (although be in possession of mobile phone in case of emergency)
- It is down to the discretion of staff members to make the decision of whether it is safe to transport young players in bad weather conditions. Staff should not transport young players if they do not feel it is safe to do so in the road or weather conditions. If a decision is made not to transport players to their destination, the relevant head of department should be informed as soon as it is safe to do so.
- Report any incidents that occur on the journey, or any unexpected/emergency journeys to the Safeguarding Officer, Academy Manager and parent/carer straight away or as soon as it is safe to do so.
- Staff are expected to take regular breaks when driving, as to avoid tiredness when driving, further information can be found at <https://www.gov.uk/drivers-hours/gb-domestic-rules>

COACH TRAVEL

- There are occasions when the Club will use a Coach Company; tours or long-distance fixtures. The Club has good relationships with reputable local transport providers (Boudens & Birmingham International) who understand the Clubs commitment to safeguarding, and who are used on the occasions when a Coach is required.
- The vehicles that are used are appropriately insured, roadworthy and regularly maintained. They are fitted with seat belts appropriate to the size and type of vehicle and passengers to be carried.
- Players are always accompanied by staff members when being transported by external transport providers.
- A transport register is created with a full-time member of staff allocated as 'group leader', being responsible for the health and safety of travelling players.
- The Register is then scanned and kept in a folder in case needed for future reference.

TRANSPORT CODE OF CONDUCT

- It is the player's responsibility when submitting a request for transport to advise whether or not they require collection/drop off only or both.
- Players are required to provide 24 hours' notice of their need to use this service and players must be accompanied by an adult for collection and drop off should they be under 16 years of age.
- All passengers must wear a seatbelt, and it is the responsibility of the driver to ensure that this requirement is met.
- Passengers must not do anything which may distract the driver or disturb their concentration.
- Staff must not offer, and apprentices or players Under 18 must not accept, lifts outside of normal working hours, unless this has been agreed by the Transport Coordinator and their guardian has consented.
- The maximum capacity for the vehicle must not be exceeded.
- Passengers must ensure that their behavior is appropriate at all times.

DRIVERS CODE OF CONDUCT

- All those involved in the transportation of young people will be required to observe the requirements of the general code of conduct found at the beginning of this section of Safeguarding Children Procedures in addition to the following conditions.
- The Club recognises that drivers can be at risk of allegation or concerns by virtue of the fact that they are often transporting individual young people alone, at night and away from the Club's main sites. It is therefore essential that drivers follow the requirements without interpretation or deviation and should any individual have any queries at all, they may discuss with the Academy Manager or the Safeguarding Services Manager before they undertake any related duties. Any failure to comply with these requirements could constitute a breach of the terms of engagement and lead to action under the Clubs disciplinary procedures.
- As a member of the Club who is seen by the public most of their working day, it is essential for the driver to remember that they are seen as a representative of the Club at all times, so it is important for them to always be dressed appropriately. If you wish to wear the Club's tracksuit to work this is acceptable, the alternative would be a suit and tie. It is your preference. Please ensure that you have the correct attire by checking with the Academy manager or designated deputy.
- Given how drivers will be in close proximity to others, extra attention to personal hygiene is required with the driver being 'presentable' throughout their duties.
- All drivers are reminded that they must not consume alcohol within 8 hours of commencing their duties and if more than 8-10 units of

alcohol have been consumed, then this increases to 12 hours, as one unit of alcohol can take an hour to disperse into your system. If you are unsure about how much you may have consumed and whether you are safe to drive or not, please refer to the Department of Health website for guidance. If you are still not sure then you should refrain from your driving duties.

- Equally, it is the driver's responsibility to ensure they have had sufficient sleep to undertake their duties. Should some personal difficulty affect this, the driver must discuss this with the Transport Coordinator or designated deputy as to their suitability to undertake their duties.
- All drivers are reminded that it is illegal to use a mobile phone whilst driving and that any prosecution is against the individual not the organisation.
- No driver should ever make individual arrangements to transport any young person, whether associated with the Club or not, in any Club vehicle at any time. Equally, all Club based arrangements must be made by the Academy Manager or designated deputy and will be recorded by them. The driver is expected to contribute to these arrangements by advising on expected times/journey routes they will take and of any specific road difficulties they are aware of e.g. Traffic, roadwork's, alternative routes etc.
- Occasionally the planned arrangements will need to be altered, but this will only be at the Transport Coordinator or designated deputy's direction and they will take responsibility to record this change.
- All drivers are required to advise the Transport Coordinator of any change to their own circumstances, which may have a bearing on their ability to undertake the tasks associated with being a driver for the Club. This means all medical and criminal situations, which the law requires the DVLA to be notified of, inclusive of speeding offences, temporary physical disability and the use of prescription drugs which advise against the use of machinery and driving while in use, any failure to adhere to this will result in the Club acting under the disciplinary process.
- Before commencing on any journey the driver must make a reasonable visual spot check of the vehicle being used to ensure it is safe to precede, once a driver starts their duties, legally it is the drivers responsibly to ensure the vehicle is safe to be driven. Should the vehicle appear unsafe in any way, the driver must immediately advise the Transport Coordinator, so alternative plans can be implemented. It is important for the driver to take all necessary contact numbers with them should the journey be delayed in any way and parents and host families etc. must be kept informed, regardless of the space of delay. In all circumstances and at all times, it is not acceptable for the driver to have a sole young person sit in the front of the vehicle, regardless of which vehicle is being used or how short the distance to be travelled. The only time it is permitted to have a young person in the front seats of a vehicle is when there are multiple passengers, in which case, the front seat passengers must in all circumstances be the first to vacate the vehicle, therefore no one is left alone in the vehicle in the front seat as others are dropped off.
- Ensure all young people who are transported in your vehicle are wearing seatbelts, eating and drinking should not take place in the vehicle to minimize the potential harm from choking, which can also distract the driver's attention off the road. However, when another adult is present and the journey is lengthy this can be overridden.
- It is essential for the driver to take rest/comfort breaks on long journeys and young people must cooperate and understand that it is a time of quiet.
- The driver is responsible for any music played in the vehicle, either on the vehicle's stereo or on young people's portable devices to have the volume of a comfortable level to avoid distraction or annoyance. Any young person behaving inappropriately will be reported to the Transport Coordinator on return to the Academy for sanctions to be applied.
- Under no circumstances ever, is the driver to threaten action, raise their voice, swear or in any way act inappropriately towards a young person. This includes those situations when they have failed to comply with a request to behave more appropriately and regardless of the cause of refusal to comply.
- If the driver is alone and any young person being transported interferes or attempts to interfere with the driver's ability to drive, the club requires the driver to pull over at the first safe and available moment and contact the Transport Coordinator to seek support and direction. If this is not possible, and there is a genuine concern for anyone's wellbeing, then the assistance of the police should be sought immediately. If the police are in attendance, then the driver must contact the Transport Coordinator or the Head of Safeguarding as soon as possible for advice.
- In the unlikely event that the journey is interrupted by incident, accident or breakdown, the driver must immediately contact the Transport Coordinator deputy for advice and guidance. The Transport Coordinator will then take the appropriate action, which may include attending the scene or sending another officer to support the situation.
- If the driver is unable to continue with their duties as a result of the incident, then the Transport Coordinator will take responsibility for the young and the resolution of their journey needs.



APPRENTICES TRAVELLING IN OWN VEHICLES

- It is the responsibility of any apprentice travelling to or from training, college or the ground to have the appropriate 'business use' on their insurance.
- It is also the responsibility of the apprentice to have the appropriate insurance in order to carry passengers for both leisure and business activities.
- The club will not ask apprentices to provide transport for peers or staff during their working hours.
- There are many risks associated with young drivers, which apprentices should be aware of. Further information can be found at www.rospa.com/road-safety/advice/young-drivers/young-drivers-at-work/

FURTHER INFORMATION

Safeguarding Manager: Wes Hughes (Email: wes.hughes@bcfc.com)

Health & Safety Officer: Dave Houlton (Email: dave.houlton@bcfc.com)

Head of Academy Education & Welfare- DSO: Mark Sinclair (Email: mark.sinclair@bcfc.com)

HR Manager: Michelle Daly- DSO: (Email: michelle.daly@bcfc.com)

Head of Academy Operations: (Email: tim.smith@bcfc.com)

Academy Transport & Match Day Coordinator: Dan Ferrar (Email: dan.ferrar@bcfc.com)

DECLARATION OF AGREEMENT AND UNDERSTANDING

I have read, have understood and agree to adhere to Birmingham City FC's safeguarding policies and procedure and the guidance for safer working practices.

If I am unsure of anything, either upon reading these documents or when dealing with a safeguarding concern, I will seek advice from the Club to clarify any uncertainties or for further support.

Forename	
Surname	
Position	
Date	
Signature	

USEFUL CONTACTS

BIRMINGHAM CITY FC – SAFEGUARDING SERVICES MANAGER

WES HUGHES

E: WES.HUGHES@BCFC.COM

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