

Birmingham City FC

Safeguarding Children and Vulnerable Adults Policy

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This policy has been approved in December 2020 by

Dong Ren	CEO	
Lungi Macebo	COO and Senior Safeguarding Manager	
Danetta Powell	Club Safeguarding Manager	
Mike Dodds	Head of Academy	
Mark Sinclair	Head of Academy Operations and Development	

This policy is to be reviewed by the Club in December 2021 or in the event of any serious safeguarding incident.

1.0 Introduction

1.1 Definitions

Safeguarding is the act of promoting children's welfare and protecting them from harm.

Safeguarding as defined by NSPCC is:

- protecting children from abuse and maltreatment
- preventing harm to children's health or development
- ensuring children grow up with the provision of safe and effective care
- taking action to enable all children and young people to have the best outcomes

"As per the definitions set out in the Children Act 1989, a 'child' is anyone who has not yet reached their 18th birthday. It also includes unborn children.

Adults aged 18 and over have the potential to be vulnerable (either temporarily or permanently) for a variety of reasons and in different situations. An adult may be vulnerable if he/she:

- Has a learning or physical disability
- Has a physical or mental illness, chronic or otherwise, including an addiction to alcohol or drugs
- Has a reduction in physical or mental capacity
- Is in the receipt of any form of healthcare
- Is detained in custody
- Is receiving community services because of age, health or disability
- Is living in sheltered or residential care home
- Is unable, for any other reason, to protect himself/herself against significant harm or exploitation" (National Children's Bureau, 2018)

1.2 Club's Commitment

Birmingham City Football Club is committed to promoting children's welfare and protecting them from harm. We believe that all children and young people:

- Have the right to be protected from harm, abuse and neglect

- Have the right to an education and to feel safe in their educational setting
- Are supported according to their individual needs
- Should be encouraged to respect the values of other people
- Have the right to express their views, feelings and wishes
- To be supported in nurturing their social, emotional and mental health and well-being

1.3 Club's Responsibilities

Birmingham City Football Club will contribute to protecting children and young people through the prevention of abuse, victimisation, bullying (including homophobic, bi-phobic, trans-phobic and cyber-bullying), exploitation, extreme behaviours, discriminatory views and risk-taking behaviour.

The Club accept that all staff and visitors have a role to play in safeguarding our young people.

2.0 Aims of the policy

This policy will contribute to the safeguarding and protection of the young people affiliated with the Club by:

- Clarifying the expected standards of behaviour for staff, players and parents
- Encouraging open and honest relationships between staff, parents and players
- Alerting staff to the signs of abuse
- Detailing best practice procedures for staff

2.1 Monitoring of the policy

This policy will be reviewed a year after development and annually thereafter or in the following circumstances:

- Changes in legislation or national guidance
- As required by the Birmingham Safeguarding Children's Board
- As a result of any other significant change in the Club
- As a result of a review of a serious safeguarding failure

3.0 Expectations

3.1 Club expectations of staff

All staff and visitors will:

- Be familiar with and adhere to all guidance in this safeguarding policy
- Understand their responsibility for safeguarding
- Be subject to Safer Recruitment processes and checks, regardless of whether they are a new starter, volunteer or contractor
- Be alert to signs and of possible abuse
- Record any concern and pass a record of their concern directly to the DSL or a deputy DSL



- Deal with a child/young person's disclosure of abuse in line with the guidance provided in this policy

3.2 Staff expectations of the Club

All staff can expect to receive annual Safeguarding training and update briefings as appropriate. Key staff will undertake more specialist safeguarding training as recommended by the FA.

4.0 Club Designated Safeguarding Leads

4.1 DSL

The Club's DSL is Danetta Powell. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL. This responsibility should not be delegated.

4.2 Deputy DSLs

The deputy DSLs will support the DSL within the role and take lead when the DSL is not on site. They are:

- Adele Barron
- Ciara Gallagher
- Stuart English
- Tim Smith
- Simon Jones
- Danny Barham
- Mark Sinclair
- Adam Roche
- Sarah Westwood
- Jonathan James

4.3 DSL Training

Our DSL and any deputies must undergo training to provide them with the knowledge and skills required to carry out the role. The training should be updated annually.

5.0 Safeguarding Information

5.1 Confidentiality

Safeguarding information will always be treated in a confidential manner. Wider staff will be informed any relevant information as and when the DSL deems this appropriate; and believes that sharing this information will allow staff to better support the child/young person.



5.2 Records

Safeguarding records will be stored securely in a central place overseen by the DSL and be kept separate from player files. Individual files will be kept for each child/young person. Records will be kept for at least the period during which the young person is registered with the Club, and beyond that in line with current data legislation.

5.3 Sharing Information

Parents should be made aware of what information the Club keeps about their children and should always be informed of any concerns staff may have. However, staff should not disclose any information to parents if the sharing of this information might put the child at risk of significant harm.

In the instance of a player's registration transferring to another Club, Birmingham City FC may share safeguarding records with them in the interests of continuing any support the player needs. A player and/or their parents will be informed should this occur.

5.4 Working with partners and commissioned services

We are committed to working closely with other organisations within sport and child protection so that we can identify, address and eradicate bad practice and in turn better protect our children and vulnerable adults.

6.0 Club Culture

6.1.1 Safer Recruitment

The Club is committed to safer recruitment and follows the NSPCC's Child Protection in Sport's guidance. We will ensure anyone undertaking a role that involves contact with or responsibility for children (or other vulnerable groups) will be taken through a safer recruitment process. A copy of our safer recruitment policy can be sourced from our HR department.

Our safer recruitment procedure includes:

- a clear job description and person specification
- creating an advertisement for the post
- standardised application form to gather relevant information about each applicant
- requirement of specific written references
- interviews of shortlisted applicants
- for relevant posts, undertaking a criminal records check - Disclosure and Barring Service (DBS)
- risk assessment of any concerning information
- verifying qualifications and experience
- recording recruitment decision



- induction to the role (including safeguarding policies and procedures, safeguarding training, staff handbook)
- for relevant posts, attending the FA Safeguarding Children and Welfare workshop
- probationary period

The Club's COO, Safeguarding Manager, HR department and relevant HOD's have all completed safer recruitment training and at least one of these persons will always be involved in a recruitment process and sit on an interview panel.

6.1.2 DBS

Any member of staff undertaking regulated activity with a child are required to undertake an enhanced criminal records check.

6.2 Staff Induction

All staff must be aware of systems within the Club which support safeguarding and these should be explained to them as part of staff induction. This should include:

- The safeguarding policy
- The staff code of conduct
- The role of the DSL (including the identity of the DSL and any deputies)

6.3 Whistleblowing

We are committed to ensuring that all of us have a safe, reliable, and confidential way of reporting any suspicious activity. We want each and every member of staff to know how they can raise concerns.

We all have a responsibility to help detect, prevent and report instances of bribery. If you have a concern regarding a suspected instance of bribery or corruption, please speak up – your information and assistance will help. The sooner you act, the sooner it can be resolved.

Preferably the disclosure will be made and resolved internally (e.g. to your Line Manager/Head of Department). Secondly, where internal disclosure proves inappropriate, concerns can be raised under the Whistleblowing Policy. Raising concerns in these ways may be more likely to be considered reasonable than making disclosures publicly (e.g. to the media). Staff can locate the Whistleblowing Policy in the Staff Handbook which can be found in your induction folder, a copy can also be obtained from the Club's HR department.

Concerns can be anonymous. In the event that an incident of bribery, corruption, or wrongdoing is reported, we will act as soon as possible to evaluate the situation.

Staff who refuse to accept or offer a bribe, or those who raise concerns or report wrongdoing can understandably be worried about the repercussions. We aim to encourage openness and will support anyone who raises a genuine concern in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring nobody suffers detrimental treatment through refusing to take part in bribery or corruption, or because of reporting a concern in good faith.



7.0 Personal Media

Online technology continues to advance and change the way people communicate and interact on a daily basis. Our Club, coaches and other involved in our provision for young people are increasingly using the internet and social media to communicate with them. Whilst these form of digital media and communication can provide great benefits, we fully appreciate the potential safeguarding risks they pose. As such the Club provides clear guidance for its staff and players to adhere to in the interests of keeping everyone safe.

7.1 Staff personal media guidance

The Club makes the following commitments:

- To monitor social networking pages regularly.
- To gain consent from parents before any access is given to a young person under the age of 18 (e.g WhatsApp groups).
- To always use group messages rather than message a young person directly and to ensure that parents and a DSL are copied into any communication with a young person.
- For all communications with young people to only be related to Club specific activities.
- Staff will not 'friend' or 'follow' a young person from their personal social media accounts.
- Staff will not communicate with a young person via personal accounts or private messages.
- Staff will avoid making contact with a young person outside of usual office hours.
- All messages to a young person will be signed off in a professional manner.

7.2 Young players personal media guidance

The Club wants all its young people to be able to use the internet and social media safely and fully appreciates all of the benefits that this can bring.

The Club has an acceptable use statement for internet and social media use (Appendix 1) which must be agreed to by all young players and their parents.

7.3 Guidance and procedures for youth produced sexual imagery

Youth produced sexual imagery is defined as the production and/or sharing of sexual photos and videos of and by young people who are under the age of 18. It includes nude or nearly nude images and/or sexual acts. It is also referred to as 'sexting'.

7.3.1 Guidance for staff

What to do if an incident involving 'sexting' comes to your attention:

(In keeping with guidance from the UK Council For Child Internet Safety and KCSIE 2019.)

Report it to your Designated Safeguarding Lead (DSL) immediately.

- Never view, download or share the imagery yourself, or ask a child to share or download – this is illegal.



- If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL.
- Do not delete the imagery or ask the young person to delete it.
- Do not ask the young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL.
- Do not share information about the incident to other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- Do not say or do anything to blame or shame any young people involved. Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL.

7.3.2 Guidance for players

Sexting can be seen as harmless, but creating or sharing explicit images of a child is illegal, even if the person doing it is a child. A young person is breaking the law if they:

- Take an explicit photo or video of themselves or a friend.
- Share an explicit image or video of a child, even if it's shared between children of the same age.
- Possess, download or store an explicit image or video of a child, even if the child gave their permission for it to be created.

8.0 Codes of conduct

There are three codes of conducts that are revised and circulated annually:

- Academy Parents and Carers
- Staff and Volunteers
- Academy Players

They are each designed to give clear guidance on the standards of behaviour expected by the Club.

The Club will always investigate and action breaches of their codes of conduct.

9.0 Prevention of abuse

Whilst we have a DSL and deputy DSLs in place, we will encourage a culture of shared responsibility for the safeguarding of our young people.

We will provide young people to develop skills, concepts, attitudes and knowledge that promote their safety and well-being.

We will ensure all staff are aware of the signs and indicators of abuse and are confident on how to respond.

We will keep accurate records of all concerns, escalating and referring where appropriate.

We will operate an open and honest environment where young people feel they have a trusted adult to confide in.



We will put the well-being of our young people at the centre of all our decisions.

10.0 Responding to and reporting concerns

The reporting of concerns is the responsibility of all staff at the Club. All concerns should be reported to a DSL using the incident reporting portal. The Safeguarding Manager will monitor all concerns which have been logged and action accordingly.

The Responding To A Concern flowcharts should be followed in all cases. (Appendices 2.1, 2.2, 2.3)

All allegations or suspicions and concerns are to be treated seriously and without delay. It is imperative that all reporting of an allegation made by a child is recorded in the 'child's voice' (i.e. as they have described it to you, without interpretation, bias or judgement).

Where there is evidence of immediate harm then the employee should phone 999 and report the incident to the Police.

11.0 Safeguarding those at risk of radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

Extremism is defined by the Crown Prosecution Service as: The demonstration of unacceptable behaviour by using any means or medium to express views which:

- Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
- Seek to provoke others to terrorist acts;
- Encourage other serious criminal activity or seek to provoke others to serious criminal acts;
- or
- Foster hatred which might lead to inter-community violence in the UK.

11.1 The Prevent and Channel Programme

Prevent is the Government's strategy to stop people becoming involved in violent extremism or supporting terrorism, in all its forms. Prevent works within the non-criminal space, using early engagement to encourage individuals and communities to challenge violent extremist ideologies and behaviours.

Channel is an early intervention multi-agency process designed to safeguard vulnerable people from being drawn into violent extremist or terrorist behaviour. Channel works in a similar way to existing safeguarding partnerships aimed at protecting vulnerable people.

11.2 Risk Reduction and Response

If you believe that someone within the Club is vulnerable to being exploited or radicalised, contact the Safeguarding Manager to escalate your concerns to the appropriate leads, who can raise concerns to Channel if appropriate.



11.3 Training

All staff are required to complete basic PREVENT training via the government's website every three years. Copies of certificates will be retained by the Club's HR department.

12.0 Safeguarding those at risk of exploitation, forced marriage, FGM or trafficking

Our Safeguarding Policy provides the basic platform to ensure children and young people are given the support to respect themselves and others, stand up for themselves and protect each other.

Our Club keeps itself up to date on the latest advice and guidance provided to assist in addressing specific vulnerabilities and forms of exploitation.

Our staff are supported to recognise warning signs and symptoms in relation to specific issues, and our education programme will include such issues, in an age-appropriate way.

Staff are supported to talk to families about sensitive concerns in relation to their children and to find ways to address them together wherever possible.

Our DSLs know where to seek and get advice as necessary and our school will bring in experts and uses specialist material to support the work we do.

As an education provider we will comply with legislation which subject school to a mandatory reporting requirement in respect of female genital mutilation. If a member of our staff discovers that an act of FGM appears to have been carried out on a girl aged under 18, that staff member has a statutory duty to report it to the Police. Failure to report such cases will result in disciplinary sanctions. They will also discuss the situation with the DSL who will consult Birmingham Children's Trust.

13.0 Adults at Risk

Birmingham City FC is committed to creating and maintaining a safe and positive environment and accepts our responsibility to safeguard the welfare of all adults involved in football in accordance with the Care Act 2014. The policy and procedures apply to all adults, 18 years or older, involved in football and applies to all employees paid and voluntary.

13.1 Definitions

For the purpose of this Policy the following definitions apply:

Adults at risk of harm

A person aged 18 or over who has needs for care and support (whether or not the local authority is meeting any of those needs) and

- is experiencing, or at risk of, abuse or neglect and
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.



This may include people with learning disabilities, sensory impairments, mental health needs, older people and people with a physical disability or impairment. It may also include people who are affected by the circumstances that they are living in, for example experiencing domestic violence. This list is not exhaustive.

An individual's level of vulnerability to harm may vary over time depending on the circumstances they are in and their needs at that time.

Abuse

Abuse is defined as a violation of an individual's human and civil rights by any other person or persons. It includes acts of commission (such as an assault) and acts of omission (situations where the environment fails to prevent harm). Abuse may be single act or omission or series of acts or omissions.

Capacity

Capacity refers to an individual adult's ability to take a specific decision or take a particular action at a particular time even if they are able or not able to make other decisions at other times. The starting point should be that the person has capacity to make a decision unless it can be established that they cannot.

Abuse specific to adults at risk

Appendix 3 of this policy outlines definitions and indicators of abuse for young people. However the Care Act defines additional types of abuse related specifically to safeguarding Adults at Risk which are described below.

Financial or material abuse

Stealing from an adult at risk, using them for financial gain, putting pressure on them about wills, property, inheritance or financial transactions, misusing or stealing their property, possessions or benefits. It may include depriving a person access to their money, property or assets. Financial abuse is something more usually related to adults but where professional (and future professional) footballers are concerned, this is a significant area of risk.

Coercive control

Coercive or controlling behaviour does not relate to a single incident, it is a purposeful pattern of incidents that occur over time in order for one individual to exert power, control or coercion over another. For example, restricting access to money, restricting movements, isolating the victim from family and friends, intercepting messages, or phone calls.

Modern slavery

Encompasses slavery, human trafficking, and forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.



Trafficking

The United Nations (UN) defines Trafficking in people as: the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, or abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purposes of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs. The recruitment, transportation, transfer, harbouring or receipt of a child for the purpose of exploitation shall be considered 'trafficking in persons' even if this does not involve any of the means as set out above.

Organisational

Neglect and poor care practice within an institution or specific care setting such as a hospital, care home or where care is provided within an Adult at Risk's own home. This may range from one off incidents to on-going ill treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes or practices within an organisation.

Neglect/acts of omission

Ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services or the withholding of the necessities of life, such as medication, adequate nutrition and heating. Self-neglect: Neglecting to care for one's personal hygiene, health or surroundings, and includes behaviour such as hoarding.

