

# MandateNow Review of FA Safeguarding Children Policy

## Safeguarding Children Policy and Procedures

### Club Template

#### Football Club Safeguarding Children Policy

1. [Insert name] Football Club acknowledges its responsibility to safeguard the welfare of every child and young person who has been entrusted to its care and is committed to working to provide a safe environment for all members. A child or young person is anyone under the age of 18 engaged in any club football activity. We subscribe to The Football Association's (The FA) Safeguarding Children – Policy and Procedures and endorse and adopt the Policy Statement contained in that document.

*A worthy statement that requires no specific action of anybody*

2. The key principles of The FA Safeguarding Children Policy are that:

- the child's welfare is, and must always be, the paramount consideration
- all children and young people have a right to be protected from abuse regardless of their age, gender, disability, race, sexual orientation, faith or belief
- all suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately
- working in partnership with other organisations, children and young people and their parents/carers is essential.

We acknowledge that every child or young person who plays or participates in football should be able to take part in an enjoyable and safe environment and be protected from poor practice and abuse. [Insert name] Football Club recognises that this is the responsibility of every adult involved in our club.

*Another worthy statement*

3. [Insert name] Football Club has a role to play in safeguarding the welfare of all children and young people by protecting them from physical, sexual or emotional harm and from neglect or bullying. It is noted and accepted that The Football Association's Safeguarding Children Regulations (see The FA Handbook) applies to everyone in football whether in a paid or voluntary capacity. This means whether you are a volunteer, match official, helper on club tours, football coach, club official or medical staff.

*And another*

4. We endorse and adopt The FA's Responsible Recruitment guidelines for recruiting volunteers and we will:

- specify what the role is and what tasks it involves
- request identification documents
- as a minimum meet and chat with the applicant(s) and where possible interview people before appointing them
- ask for and follow up with 2 references before appointing someone
- where eligible require an FA accepted Enhanced Criminal Record Check (CRC) with Barring List Check in line with current FA policy and regulations.

All current [Insert name] Football Club members working in eligible roles, with children and young people - such as managers and coaches are required to hold an in-date FA accepted Enhanced CRC with Barring List check as part of responsible recruitment practice<sup>1</sup>.

If there are concerns regarding the appropriateness of an individual who is already involved or who has approached us to become part of [Insert name] Football Club guidance will be sought from The Football Association. It is noted and accepted that The FA will consider the relevance and significance of the information obtained via the CRC Process and that all suitability decisions will be made in accordance with legislation and in the best interests of children and young people.

It is accepted that The FA aims to prevent people with a history of relevant and significant offending from having contact with children or young people and the opportunity to influence policies or practice with children or young people. This is to prevent direct sexual or physical harm to children and to minimise the risk of 'grooming' within football.

*This is a reasonable summary of a safer recruitment policy. However safer recruitment is only a first line of defence. If done properly it keeps out people who are already known to be a threat. But everyone abuses for the first time somewhere, the DBS list is only as good as the referrals to it and will not have the names of anybody who hasn't been brought to its attention by a whistleblower. Therefore checking with DBS has to be supplemented with procedures for reporting concerns about the behaviour of any member of staff or the welfare of any child at the club.*

5. [Insert name] Football Club supports The FA's Whistle Blowing Policy. Any adult or young person with concerns about a adult in a position of trust with football can 'whistle blow' by contacting The FA Safeguarding Team on 0800 169 1863, by writing to The FA Case Manager at The Football Association, Wembley Stadium, PO Box 1966, London SW1P 9EQ, by emailing [Safeguarding@TheFA.com](mailto:Safeguarding@TheFA.com) or alternatively by going direct to the Police, Children's Social Care or the NSPCC. [Insert name] Football Club encourages everyone to know about The FA's Whistle Blowing Policy and to utilise it if necessary.

*Whistleblowing implies that the whistleblower has to highlight wrongs by going outside the organisation that couldn't be addressed through internal channels. Also, what effect does the FA imagine will be achieved by somebody whistleblowing **within** the FA when the FA is under no legal obligation to discuss or refer the concern to the Local Authority?*

6. [Insert name] Football Club has appointed a Club Welfare Officer in line with The FA's role profile and required completion of the Safeguarding Children and Welfare Officers Workshop. The post holder will be involved with Welfare Officer training provided by The FA and/or County FA. The Club Welfare Officer is the first point of contact for all club members regarding concerns about the welfare of any child or young person. The Club Welfare Officer will liaise directly with the County FA (CFA) Welfare Officer and will be familiar with the procedures for referring any concerns. They will also play a proactive role in increasing awareness of Respect, poor practice and abuse amongst club members.

***It's very interesting what is not mentioned about the role of the Club Welfare Officer. The CWO is not expected (neither according to this policy nor according to the separate CWO***

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<sup>1</sup> The FA's policy on Disclosure and Barring Service CRCs is subject to change. CRC information and guidance can be found at [www.TheFA.com/football-rules-governance/safeguarding/criminal-records-checks](http://www.TheFA.com/football-rules-governance/safeguarding/criminal-records-checks)

*leaflet) to raise child protection concerns outside the FA, i.e. to local authority children's services. It's all kept in-house. This is a critical weakness. An effective child protection policy must involve raising concerns with those who have both the training and authority to properly investigate. The FA has neither.*

7. We acknowledge and endorse The FA's identification of bullying as a category of abuse. Bullying of any kind is not acceptable at our club. If bullying does occur, all players or parents/carers should be able to tell and know that incidents will be dealt with promptly. Incidents need to be reported to the Club Welfare Officer in cases of serious bullying the CFA Welfare Officer may be contacted.

*Again, it's all being kept within the FA.*

8. Respect codes of conduct for Players, Parents/ Spectators, Officials and Coaches have been implemented by [Insert name] Football Club. In order to validate these Respect codes of conduct the club has clear actions it will take regarding repeated or serious misconduct at club level and acknowledges the possibility of potential sanctions which may be implemented by the County FA in more serious circumstances.

*Doesn't say what the clear actions are. So by definition it's not clear!*

9. Reporting your concerns about the welfare of a child or young person. Safeguarding is everyone's responsibility if you are worried about a child it is important that you report your concerns – no action is not an option.

i. If you are worried about a child then you need to report your concerns to the Club Welfare Officer.

*This is fine as far as it goes, which is not very far. It tells all club staff to report concerns to the CWO.*

ii. If the issue is one of poor practice the Club Welfare Officer will either:

- deal with the matter themselves or
- seek advice from the CFA Welfare Officer

iii. If the concern is more serious – possible child abuse, where possible, contact the CFA Welfare Officer first, then immediately contact the Police or Children's Social Care.

*This is not good. It doesn't explicitly say who should be contacting the CFA Welfare Officer, though an initial reading is that the person with the concern should be making the report as this item is worded as an instruction following on from the introductory text of section 9. It's not for an ordinary member of staff to be able to diagnose whether there is "possible child abuse" and therefore decide whether under option (ii) merely to inform the CWO or under option (iii) to contact children's social care directly. Moreover item (iii) contradicts the procedure of item (i) which is always to go to the CWO. It's a disorganised mess.*

*The correct approach should be that all concerns go to the CWO, who then passes any case that may involve harm to a child straight to local authority children's services. If the CWO is not certain, he should phone the Local Authority for advice to see if a formal referral is needed. Once local authority children's services (LADO) are aware, it is for them to decide whether the child is sufficiently at risk of harm for them to investigate.*

***If the FA actually intends that the CWO should report to CFA WO and local authority children's services, then this item has been appallingly badly written. This is just not good enough for document describing how to keep children safe.***

iv. If the child needs immediate medical treatment take them to a hospital or call an ambulance and tell them this is a child protection concern. Let your Club Welfare Officer know what action you have taken, they in turn will inform the CFA Welfare Officer.

*The passage about medical attention is fine, the reporting arrangements thereafter are not. Yes, the CWO should be informed as soon as possible, but if there is a child protection concern here, then local authority children's services should be informed immediately.*

*Note that under item (iii) the individual staff member is supposed to inform the CFA Welfare Officer direct, while her (a supposedly more serious case) the CFA Welfare Officer is informed via the CWO. This really hasn't been thought out properly. These procedures do not match those of the FA's document "Grassroots Football Safeguarding Children: Working together to Safeguard Football: Our policy and procedures"*

v. If at any time you are not able to contact your Club Welfare Officer or the matter is clearly serious then you can either:

- contact your CFA Welfare Officer directly
- contact The FA Safeguarding Team on 0800 169 1863 or [Safeguarding@TheFA.com](mailto:Safeguarding@TheFA.com)
- contact the Police or Children's Social Care
- call the NSPCC 24 hour Helpline for advice on 0808 800 5000 or text 88858 or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

*This is absurd. When the Club Welfare Office is available, there is nothing in this procedure which suggests he **should contact anybody other than the CFA Welfare Officer**. So why is it suggested that others "can" contact the police, children's social care or the NSPCC helpline? What is more, does the FA Safeguarding Team and [Safeguarding@TheFA.com](mailto:Safeguarding@TheFA.com) only exist to take calls from clubs when the CWO is not available?*

NB – The FA's Safeguarding Children Policy and Procedures are available via – [www.TheFA.com/football-rules-governance/safeguarding](http://www.TheFA.com/football-rules-governance/safeguarding) – click on 'Raising Awareness – Best Practice Downloads', the Policy and Procedures document is within the resources area. The policy outlines in detail what to do if you are concerned about the welfare of a child and includes flow diagrams which describe this process. How to make a referral is also covered in the Safeguarding Children workshop. Participants are given the opportunity to discuss how this feels and how best they can prepare themselves to deal with such a situation. For more information on this workshop contact your County Welfare Officer.

*The "How to make a referral" form addresses how to make a referral within the FA. Not how to make a referral to local authority children's services.*

*If the full policy as described in the 'grassroots policy' is what every club should be implementing, then there is absolutely no purpose in the existence of this extremely abbreviated version that misses out just about all the important procedures.*

Further advice on Safeguarding Children matters can be obtained from:

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County Football Association's Welfare Officer

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- [www.TheFA.com/football-rules-governance/safeguarding](http://www.TheFA.com/football-rules-governance/safeguarding)
- Emailing – [Safeguarding@TheFA.com](mailto:Safeguarding@TheFA.com)
- The FA Safeguarding Children general enquiry line 0845 210 8080