

# Section 1

## 1.0 Introduction

The FA continues to be committed to ensuring all necessary steps are taken to protect from harm children and young people who participate in grassroots football. This document together with the safeguarding regulations, best practice guidelines and educational programme sets out The FA's position, role and responsibilities, and clarifies what is expected of County Associations; their affiliated clubs and leagues.

Everyone involved in football needs to understand the individual and collective responsibility they undertake when working with children and young people. It's clear that working together and giving young people a voice makes a difference when it comes to having effective safeguards in football.

It's essential that everyone is clear about how to report a concern about the welfare of a child or young person. In short this means following the guidelines set out in this policy. Further support and guidance can be obtained through your club or league Welfare Officer and County Association Welfare Officer. This essential network of Welfare Officers is further supported by The FA's Safeguarding team at Wembley.

Remember it's not your responsibility to decide if abuse is taking place, but it is your responsibility to report any concerns you may have.

*No specific requirements defined. But it is an introduction*

## 1.1 the association's Safeguarding Children Policy

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 abuse. This is the responsibility of every adult involved in football, thus every club is required to endorse and adhere to The Association's Safeguarding Children Policy.

The FA recognises its responsibility to safeguard the welfare of children and young people who play or participate in football by protecting them from abuse and harm.

This means creating a safe and inclusive atmosphere where everyone at the club works together to tackle both bullying and discrimination, ensure safer recruitment, and tackle poor practice which leads to harm and reduces equal opportunities.

Best practice in Inclusion, Anti-bullying, Equality and the Respect agenda are all part of making safer cultures and prevention of harm and abuse.

The FA is committed to working to provide a safe environment for all children and young people to participate in the sport to the best of their abilities for as long as they choose to do so.

The FA recognises that the terms 'child or young person', 'abuse' and 'harm' are open to interpretation, so for the purposes of this policy, these are defined in Appendix 1.

*This is the FA's safeguarding policy. So this document has just spent six paragraphs describing itself.*

### **The association's Safeguarding Children Policy principles 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, gender reassignment, sexual orientation, marital status or civil partnership, racial origin, faith, ability or disability, pregnancy and maternity
- 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 and carers is essential

*This is a worthy set of objectives, some of which have little or nothing to do with children. How many children are pregnant or have a marital status? That a standard-issue set of worthy objectives has been dropped in here with little thought as to its applicability to children is not encouraging.*

The FA is committed to working in partnership with the Police, Children's Social Care, Local Safeguarding Children's Boards (LSCB) and the Disclosure and Barring Service (DBS) in accordance with their procedures. This is essential to enable these organisations to carry out their statutory duties to investigate concerns and protect all children and young people.

*Not "in partnership" with other organisations "in accordance with their procedures". FA has to cooperate with DBS by law.*

The Association's Safeguarding Children Policy is in response to government legislation and guidance, developed to safeguard the welfare and development of children and young people.

Clubs and leagues with youth teams must appoint a Welfare Officer in line with FA affiliation requirements. All league and club Welfare Officers are expected to abide by the Code of Conduct for volunteer Welfare Officers.

*The role of the Club Welfare Officer is weak in terms of ensuring that child protection concerns get to local authority children's services*

The safeguarding children policy is further supported by The FA's Respect programme to address verbal abuse and bullying of youngsters by parents and coaches on the sidelines. More information can be found in Sections 3.1 and 3.2.

## Section 2

### 2.0 recruiting volunteers and staff

Grassroots football would not exist without the thousands of volunteers involved today. There are many different roles in football and ensuring we encourage individuals that are suitable is essential. Getting the right volunteers in place is key to a well organised and happy club that provides football in a safe and supportive environment.

Remember that a friendly, well run club is more likely to be successful in encouraging additional volunteers!

Whilst we understand that many clubs and leagues are in need of additional volunteers, all clubs and leagues with youth teams have a responsibility to ensure that appropriate recruitment checks have been carried out. Anyone may have the potential to abuse children and young people, therefore all reasonable steps must be taken to ensure unsuitable people are prevented from working with children and young people.

Sound recruitment and selection procedures will help to screen out those who are not suitable to work in football. Please ensure your club/league follow the steps set out here.

*This is vague. Note that the document is **not** saying that clubs “must” use these safer recruitment procedures. They are asking nicely and saying “please”.*

## 2.1 Planning and advertising

- Draw up a role profile which highlights the key responsibilities of the role
- Decide upon the skills and experience the role will need; a person specification
- Be clear about what your club/leagues aims and philosophy are in your advert/ information
- Reflect the club/leagues positive stance on safeguarding children and equal opportunities
- Use application forms to collect information on each applicant
- Ensure that more than one official looks at each application form
- Ask for original identification documents to confirm the identity of the applicant, e.g. passport or driving licence.

## 2.2 Interviewing

- Meet with all applicants prior to any recruitment decision
- Ensure more than one official is present. The meeting or interview will enable the club/league to explore further the information provided in their application form. Prepare in advance the questions you want to ask; they should provide the applicant with the opportunity to share previous experiences and give examples of how they have or would handle situations. It's important to obtain information regarding an applicant's technical capabilities and it's also necessary to explore their attitudes and commitment to child welfare. Here are examples that could be used to discover this information:

1. Tell us about any previous experience you have working with children or young people
2. Give a child related scenario and ask the applicant what they would do

e.g. 'It's a winter evening and the training sessions finished. A parent has not arrived to pick up their child – what would you do?' The applicant would be expected to say they would stay with the child and contact the parents to find out where they were.

## 2.3 references

Request at least two references from individuals who are not related to the applicant. One reference should be associated with the applicant's place of work and, if possible, one that demonstrates they have been involved in sport, particularly children's activities, previously, or

other voluntary work. References should be followed up prior to any offer of appointment being made. If the references raise any concerns you are advised to contact your CFA Welfare Officer.

## 2.4 Criminal record checks

Criminal record checks are another tool in the recruitment process. A criminal record Check Disclosure certificate contains impartial and confidential criminal history information held by the Police and government departments which can be used by The FA to make safer recruitment decisions. It can indicate that a person is not suitable to work with children, for example if they have a history of sexual offending or offences against children. It may also tell The FA that further investigations are required, for example if the person has a history of drug dealing or racist offending.

The type/level of criminal records check required in grassroots football will be determined by the role someone has, the frequency of that role being carried out and whether or not the role is supervised. Please use the guidance below to understand which roles in U18 football need to have a DBS Enhanced Criminal Record Check with Children's Barred List:

- Club Welfare Officers
- Coaches [this includes those who are referred to as Assistant Coach]
- Team Managers [including those referred to as Assistant Managers]
- Referees in U18 football, Referee Mentors, Referee Coaches and Referee Assessors
- First Aiders
- Physiotherapists and other Health and Care Professionals Council (HCPC) registered roles
- Regular Club Drivers

Ordinarily, Club Chairmen, Treasurers and Secretaries do not require a check, if they are just or mainly administrative roles. However, if the people in these roles also help with coaching or at matches, then they will need a DBS Enhanced Criminal Record Check with Children's Barred List in their role as a coach, team assistant, etc.

*In most organisations (for example schools which are companies, charities etc), the (nominal) proprietors of the organisation are considered to have ultimate the responsibility for safeguarding and are therefore expected to undergo an enhanced CRC. Ofsted insists that all the governors of every school undergo a check.*

Lots of roles do not need to have checks, for example: you do not need to have a check to watch your child play, if you occasionally run the line or if you drive your own child and his/her friends to games if this is a private and personal arrangement with other parents, or if your role is mainly administrative.

It is very important that people who do not need a check are not asked to complete one, as this is breaking the law and has serious consequences.

your role in football	action to take
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Under 18s coach, manager, first aider or other club based eligible role	Speak to your Club Welfare Officer
Club Welfare Officer	Speak to your County FA Welfare Officer
Referee	Contact your County FA Referee Development Officer
Licensed Coach applicant	Ring 0845 210 8080 or e-mail <a href="mailto:FAChecks@TheFA.com">FAChecks@TheFA.com</a> for advice
Working in a private soccer school or unaffiliated football	You may not be able to get a FA Enhanced Criminal Record Check. Please speak to your line manager or contact 0845 210 8080 or e-mail <a href="mailto:FAChecks@TheFA.com">FAChecks@TheFA.com</a> for advice
Unsure what you should be doing	Ring 0845 210 8080 or e-mail <a href="mailto:FAChecks@TheFA.com">FAChecks@TheFA.com</a> for advice

The FA will take into account the Rehabilitation of Offenders Act and only consider offences which are relevant to the care, supervision and training of children.

The FA is not allowed to tell the club about the actual offending and so applicants can be assured of confidentiality. The FA will however tell the club/league and County FA whether or not the person is considered suitable to work with children.

Anyone needing to complete an FA criminal records check can do so through their club/league Welfare Officer. There is an online application process available through FACRB. This service provides quicker, cheaper checks than the paper application and is simpler for clubs to administer.

We strongly recommend that applicants use The FA Online criminal records checks application system. For more about the online application system, e-mail

[FAChecks@TheFA.com](mailto:FAChecks@TheFA.com)

For more information about who is eligible and how to apply for a check please visit our Frequently Asked Questions – [www.TheFA.com/football-rulesgovernance/safeguarding/criminalrecords-checks](http://www.TheFA.com/football-rulesgovernance/safeguarding/criminalrecords-checks)

If you have been asked to have a check and you don't think you need one, please ring The FA Criminal Record Body on 0845 210 8080 or e-mail [FAChecks@TheFA.com](mailto:FAChecks@TheFA.com) for advice.

If you have been asked to check certain individuals and are not sure if they need a check, then please speak to your County FA Welfare Officer or e-mail

[FAChecks@TheFA.com](mailto:FAChecks@TheFA.com) for advice.

Club Welfare Officers can find out about The FA's Online Safeguarding Service; a tool developed specifically for Welfare Officers to monitor club membership and FA CRC compliance please refer to section 4.4 for more information.

*This section is hopelessly confused. It starts out by saying that criminal record checks "are another tool in the recruitment process" which gives the impression that they aren't mandatory. It then goes on to say that some roles "need" one, and then it goes on to say that other roles don't need one and it is against the law to ask for one for roles that don't need it.*

*But it's not clear that there are roles where you legally must make a CRC. How any club administrator is supposed to make sense of this is a mystery. With such a confused description of the requirements, it is a fair guess that errors and omissions occur.*

## 2.5 appointing volunteers and staff

Clubs and leagues should consider all the information they receive via the application form, confirmation of identity, the outcome of the take up of references and The FA criminal records check. This information should then be considered alongside the outcome of the meeting/ interview to make an informed decision as to whether or not to accept the applicant into their club.

## 2.6 Post appointment decisions

It is important that once a new volunteer has been recruited follow up action is taken and this should include:

- Any qualifications are substantiated e.g. request to see copies of their coaching certificate(s)
- New volunteers are made aware and sign up to the club's/league's safeguarding children policy and procedures, best practice guidelines and codes of conduct
- The roles and responsibilities of the new volunteer are signed up to
- Training needs are established and actioned
- A period of supervision/observation or mentoring is used to support the new volunteer; this is often referred to as an induction
- The FA's Safeguarding Children Workshop is completed or if it was taken over three years ago is renewed either Online or via a Workshop.

*It "should" include these items which means it's discretionary.*

# Section 3

## 3.0 Getting the essentials in place; the key safeguarding building blocks

Every football club and youth, mini soccer and girls' league must have a safeguarding children policy; this could be considered the cornerstone of your club or league. For your policy to be truly effective members need to understand what it actually means for them and that includes how it's integrated into daily football activities. A safeguarding children policy should be based on sound straight forward principles and the foundation of a well-run and effective club or league.

*If it's important that "members need to understand what [their club safeguarding policy] actually means" then the FA is setting a very poor example.*

By signing up to The FA's safeguarding children policy and Procedures (see Appendix 2) and implementing key policies and procedures, best practice will soon become common practice. It's important to make sure that this information is shared with all new members and that your club/league has a process to check that this is happening. The FAs current affiliation requirements for youth football mean every club and league with youth teams must have a Welfare Officer; they are key to ensuring everyone is aware of the safeguarding children policy and what this really means for the club/league.

Having an information event such as a pre-season open evening for new players and their parents/carers would be an excellent way of introducing your club's officials including the Welfare Officer and sharing the philosophy and expectations of the club.

*Discretionary again*

### 3.1 Policy and procedures check lists

Please make use of these checklists to ensure your club/league has the key 'building blocks' in place with which to build and develop successfully run clubs and leagues. Having these in place will guide your club/league members as to what they can expect from your club/league and what in turn you expect from them!

*Discretionary again*

Policy	In place	In progress	last revised
Safeguarding children policy			
Selection and recruitment policy			
A whistle-blowing policy			
Health and safety policy			
Anti bullying policy			
Equality policy			
Codes of conduct for coaches, players, officials and parents/spectators			
A clear club philosophy that is shared at the start of the season.			

#### Procedures check list

Procedures	In place	In progress	last revised
A Club Welfare Officer appointed*			
Procedures for reporting concerns about the welfare of a child or young person			
Complaints and disciplinary procedures			
A system for gathering player and parental consent			
A system for gathering medical information about a child or young person			
A system for gathering information about a child or young person's specific needs			
An avenue for young people to express their views and have them heard			

Information for parents, carers and players		
A committee representative of the wider local community, one that is inclusive representing current members and potential members (e.g. representing age, gender, disability and ethnicity)		
Travel and overnight stay procedures		
The FA's Respect Programme		

\*In line with The FA's affiliation policy refer to Section 4 for more information

For further guidance on developing a club or league 'Health and Safety Policy', 'Complaints and Disciplinary Policy' and having a 'Complaints Policy' see Appendix 3.

Welfare Officers will be given support on how to implement and develop the key 'safeguarding building blocks' when they attend The FA's Welfare Officer Workshop. Further information and support can be obtained via your CFA Welfare Officer. Download our recommended template policies and procedures for use in your club or league via – [www.TheFA.com/football-rules-governance/safeguarding/raisingawareness---downloads-section](http://www.TheFA.com/football-rules-governance/safeguarding/raisingawareness---downloads-section)

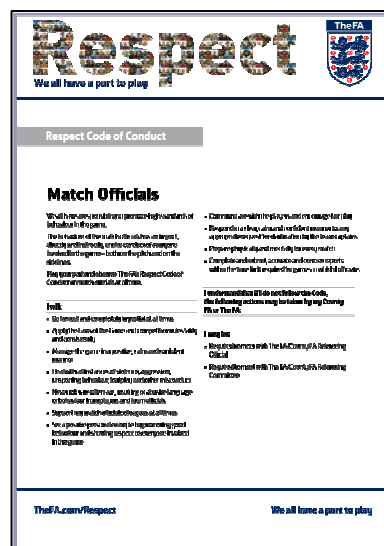
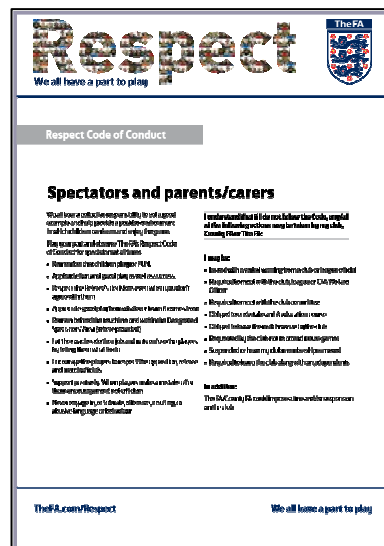
## Safeguarding children policy anti-bullying policy template for clubs



Visit the following link to download the respect codes of conduct for:

- Young players
- Spectators and parents/carers
- Coaches, team managers and club officials
- Match officials [www.TheFA.com/my-football/more/respect/respect-resources](http://www.TheFA.com/my-football/more/respect/respect-resources)





The FA is also committed to promoting equality by treating people fairly and with respect, by recognising that inequalities may exist, by taking steps to address them and by providing access and opportunities for all members of the community. It's essential that all youth clubs and leagues adhere to this policy and we would recommend you make use of The FA's template policy.

*What has the FA's equality policy got to do with safeguarding? This document appears to have large numbers of worthy statements thrown in without consideration for their relevance. Organisations which have poor safeguarding practice quite often pad their safeguarding policies*

*with lots of impressive-looking but largely irrelevant text, which has the effect of hiding how limited their procedures are.*

### 3.2 Footballs 'respect' programme

We would encourage clubs and leagues to sign up to the Respect Programme; it's free to join and there are excellent resources available to support clubs and leagues to introduce Respect.

The Respect programme includes four practical steps to improve behaviour - on the pitch and on the sidelines - in and at matches throughout the country:

Step 1: Respect Codes of Conduct

Step 2: Designated Spectator Areas

Step 3: Captain taking responsibility

Step 4: Referee managing the game

Respect is simply the collective responsibility of everyone involved in football to create a fair, safe and enjoyable environment in which the game can take place.

Ensuring everyone understands what's on offer, what's expected and what's not tolerated at your club or league will help to ensure children and young people get to play their football in a fun and supportive environment. Sign up and make use of the resources available including the following:

- Respect Codes of Conduct
- Online parents guide
- Respect guide for youth clubs
- Good practice guide for leagues
- Respect pitch side barriers
- Promotional films; these have had great reviews, they are short and to the point To access more information on these resources and others either speak with your CFA Respect Officer, CFA Welfare Officer or visit – [www.TheFA.com/Respect](http://www.TheFA.com/Respect)

*Again all very good and worthy, but (a) this has little to do with safeguarding and (b) contains no specific instructions. It is merely exhortations to good practice.*

*Experience has shown that if organisations want to cover up abuse, they will ruthlessly distinguish between mandatory and discretionary actions, and will always interpret the discretionary ones in the way that most easily facilitates the coverup.*

### 3.3 best practice guidance

We also have a wide range of safeguarding best practice guidance which aims to guide clubs and leagues on things such as how to go about 'appointing a Welfare Officer', ensuring safer recruitment of volunteers and organising trips away. For more information either ask your CFA Welfare Officer or visit – [www.TheFA.com/football-rules-governance/safeguarding](http://www.TheFA.com/football-rules-governance/safeguarding) to find out more about: •

Appointing a Club Welfare Officer

- Club Welfare Officer Roles and Responsibilities

- Appointing a Youth League Welfare Officer
- Youth League Welfare Officer Roles and Responsibilities
- Safer Recruitment
- Club Annual Membership and Consent Form
- Choosing a Club for Your Child
- Travel, Trips and Tournaments
- Safe Away Cards
- Changing Rooms and Showering Facilities
- Photography Guidelines
- Advice and Support; for individuals receiving a disclosure
- Advice and Support; for those against whom a complaint of poor practice or an allegation of abuse has been made
- Best Practice guidance on including and safeguarding Deaf and Disabled Children Guidance on how to deal with a concern about a child's welfare, can be found via – [www.TheFA.com/football-rulesgovernance/safeguarding/dealing-withconcerns](http://www.TheFA.com/football-rulesgovernance/safeguarding/dealing-withconcerns)

*Defining "best practice guidance" is not the same as having a policy that all clubs must follow on pain of sanctions from the FA.*

### 3.4 Social media

Facebook, Twitter, blogs, instant messaging and photo and video exchange sites are now common ways of communicating. All of these online tools provide a useful way for everyone in football to connect with children and young people. However the use of social networking sites also introduces a range of potential safeguarding risks to children and young people.

## NSPCC

'More than one in four children aged 11 to 16 with a social networking profile have experienced something upsetting on it the last year. The most reported issue was trolling\*.Smaller numbers of children reported experiencing other things like racism, homophobia, being urged to hurt themselves or asked to respond to or send a sexual message.'

*\*Trolling was defined as any unkind, sarcastic or negative comment or rumours circulated online*

Source: 'How Safe Are Our Children?' **NSPCC Report 2014**

Registered charity Registered charity numbers 216401 and SC037717

So it's important that you, your club/league and your members keep pace with how children and young people are being communicated with and follow the best practice guidance provided by The FA. The following information is available via – [www.TheFA.com/football-rules-governance/safeguarding](http://www.TheFA.com/football-rules-governance/safeguarding)

- Social networking, websites, mobile phone and email communications
- Running a website- Do's and Don'ts
- Responsible use of social networking sites
- Communicating responsibly with young leaders, coaches and referees U18
- Using texts and emails with U18 – Dos and Don'ts
- 'Trolling' – advice for parents

*A statement with no procedure and no requirement to act.*

For additional information and guidance on cyberbullying (including trolling) please refer to section 5.4.2

Additional care may be needed with some children with learning difficulties in terms of internet safety dependant on their understanding and development. This may be an area to consider in partnership with the child and their parent/carer.

*A statement with no procedure and no requirement to act.*

### **3.5 managing risk**

We naturally assess the potential for risks when planning activities. However, to ensure the welfare of children and young people within our care it is important to always ask the following basic questions:

- What is the activity?
- What are the ages or levels of development of the children involved?
- Where is the activity going to take place?
- Are there any additional needs within the group? How do they affect the child's ability and needs in terms of safeguarding
- Are there mixed groupings?
- What experience and qualifications do the organisers have?
- Are staffing or volunteer levels appropriate to the needs of the group?
- Do you have someone with the appropriate level of first aid training for the needs of the group?

It's important to also consider your familiarity with the venue and the level of responsibility you have for the activity e.g. at your home ground (which may or may not have access to telephone, toilet and changing facilities, first aid provision, secure perimeters) or an unknown ground that your club has to travel to. Local sports centres or community playing fields will have guidelines on use and types of facilities, which you may or may not have access to. Also be mindful of social activities at a non football venue, which may or may not be known to you.

The principles for assessing potential risks remain the same whatever the activity, therefore you need to consider these and decide what ratio of adults to children or young people you consider to be appropriate to ensure their safety.

Adult/participant ratios must be based on the age and understanding of the children and young people involved, the degree of risk the activity involves, and whether there are additional needs. The lower the age of the participants, the higher the ratio of staff should be. If the activity is mixed gender, male and female staff should ideally be available.

Whatever the age of the children and young people and type of activity, a minimum of two adults should always be present. This ensures at least basic cover in the event of an incident.

As rule of thumb teams should generally have a minimum of 1 adult to 16 children and young people. Where the children are aged 8 or younger you will require more staff and remember a minimum of two adults should always be present. If the children and young people have additional needs e.g. learning needs or a disability the ratio should be higher than 1:16 to ensure you can meet the specific needs of any given group.

You may have club volunteers including FA Level 1 Coaches who are not yet 18. They cannot be considered an adult legally; therefore this affects the ratio of adults to children and young people. However, you can ask parents to come along in such circumstances. It is also important to consider the experience of the adults involved. Clearly it is best practice to have FA Licenced Coaches.

*Descriptive text. No specific requirement or procedure.*

### **3.6 Charter standard programme**

The FA Charter Standard programme is an accreditation, which recognises and rewards high quality levels of provision in grassroots clubs and leagues. The accreditation is awarded to clubs and leagues that are well run, sustainable and which place safeguarding, quality coaching and safety as being paramount.

There are three levels of FA Charter Standard Awards for clubs to recognise the different standards.

‘FA Charter Standard Club  
(youth and adult)’ – entry level

‘FA Charter Standard Development Club’

‘FA Charter Standard Community Club’ – the most advanced level.

Each advanced level requires additional criteria to be met. Any club can apply for FA Charter Standard status, even a one team club. The criteria are challenging, but attainable for every club. Once awarded, FA Charter Standard clubs and leagues are given an annual health check to ensure the standards of provision are maintained. Signing up to The FA Charter Standard programme can help with the direction of your club, ensuring minimum standards are in place, setting a clear philosophy and ensuring consistency year on year as well as offering opportunities for growth and development.

Criteria for achieving the entry level award include having a trained Welfare Officer, Criminal Record Checks for all volunteers involved with youth teams with a valid FA Safeguarding certificate, FA Emergency Aid-trained volunteers linked to each team, Respect programme signup, a minimum Level 1 coach for each youth team, appropriate club administration in place and an volunteer FA Charter Standard Co-ordinator.

The benefits for an FA Charter Standard club include free Nike footballs, a free kit for clubs with a youth team as part of the McDonalds FA Charter Standard Kit Scheme, access to the

McDonald's FA Charter Standard Kit store for a 20% discount on all Nike kit and equipment, free access for coaches to sign up to The FA Licensed Coaches club, access to a free FA legal helpline, access to a free Charity and CASC helpline, tickets upon application for England youth and women's internationals, local in-service FA coaching events, free access to Club Matters business and administration workshops and support with funding applications.

The 'hidden' benefits are key to most clubs working towards the accreditation. By achieving The FA Charter Standard accreditation, you are demonstrating to all members, parents, sponsors and the public, that you are a well-organised, safe club offering opportunities for all.

The club accreditation lasts for one season and will be renewed each year as part of the Annual Health Check process. Accreditation awards can be withdrawn if a club has a poor disciplinary record, fails to attend in-service FA Charter Standard events or is unable to continue to meet the criteria. For more information visit – [www.TheFA.com/charterstandard](http://www.TheFA.com/charterstandard)

*Descriptive text. No specific requirement or procedure.*

## Section 4

### 4.0 responsibility for safeguarding in football

We all have a moral and legal responsibility for the safety and protection of children and young people within football. However, there are people designated at every level of the game who take a lead with regards to safeguarding children and young people. Their role also includes supporting staff and volunteers in raising and thinking through how to manage concerns with the aim of making football as safe as possible for all concerned.

The FA requires a Welfare Officer in all clubs and leagues with youth teams in order to affiliate in grassroots football. The Welfare Officer role is a position of significant responsibility. The FA therefore requires that prior to appointment, every potential Welfare Officer is considered to be 'suitable' to hold such a position as defined in the 'Welfare Officer Person Specification and Suitability Checklist' see Appendix 4.

The FA requires that all Welfare Officers are perceived as being approachable, having a child-centred approach and the ability to maintain this perspective when carrying out their role. A Welfare Officer should be clearly identified in every football setting and that includes football festivals and tournaments.

**All grassroots football Welfare Officers must have:**

- Attended an FA Safeguarding Children Workshop
- Attended a Welfare Officer Workshop
  - Completed a Disclosure Barring Service Enhanced Criminal Record Check: with Children's Barred List via The FA Criminal Records Body
- Been made aware of The FA's Welfare Officer Code of Conduct, (for more information please see Appendix 5). For more information about The FA's safeguarding courses and how to book on them please visit – [www.TheFA.com/football-rules-governance/safeguarding/raising-awareness---downloads-section](http://www.TheFA.com/football-rules-governance/safeguarding/raising-awareness---downloads-section) or speak with your CFA Welfare Officer.

*So we have a requirement to have a club welfare officer. This is about the first specific requirement (apart from 3 pages on safer recruitment that ought to be specific but aren't) and we have already made it to page 21 of a 60-page document.*

#### **4.1 The club Welfare officer**

Where clubs have multiple youth teams feedback from Welfare Officers has shown that having more than one Welfare Officer in place is incredibly helpful. Your club might wish to consider having a Welfare Officer for each of its age groups or perhaps one for boys' teams and another for girls' teams.

Having a realistic ratio of Welfare Officers to teams will help to ensure everyone knows who their Welfare Officer is, how to contact them and therefore ensure more effective safeguards are in place in your club. Why not speak with other clubs and see what the benefits have been for them.

We would also recommend that the Welfare Officer sits on the club's management committee in order that safeguarding becomes embedded in grassroots football – remember safeguarding is everyone's responsibility and the club's management committee must play its part in supporting the club Welfare Officer.

The club Welfare Officers are responsible for promoting best practice throughout the club and play a key role in dealing with poor practice concerns in line with the club's own disciplinary processes. Matters of a more worrying nature should be referred to the CFA Welfare Officer for advice and support. Confidentiality regarding concerns should be maintained on a strictly 'need to know' basis.

*Lots of "should" "might" and "recommend" here. No requirements.*

Club Welfare Offices are required by The FA to:

- Know who the CFA Welfare Officer (CFA WO) is and how to contact them
- Refer all child protection and relevant poor practice concerns to the CFA WO
- Seek advice from the NSPCC Helpline if the CFA WO is unavailable or in circumstances of child protection urgency
- Seek advice from local Children's Social Care or the Police in an emergency
- Assist the club in effectively implementing The FA's safeguarding children policy
- Assist the club to utilise The FA's Safer Recruitment best practice guidance on recruiting volunteers and always requesting and following up references and recruitment checks
- Support the club in identifying those members who require a criminal records check, ensure they complete the appropriate check via the FACRB and making use of the Online Safeguarding Service to manage compliance across the club
- Promote, support and encourage the benefits of the Safeguarding Children education programme
- Assist the club in implementing The FA's best practice guidelines.

Please refer to section 3.3 or download information via – [www.TheFA.com/football-rules-governance/safeguarding/raising-awareness---downloads-section](http://www.TheFA.com/football-rules-governance/safeguarding/raising-awareness---downloads-section)

*The second bullet is particularly worrying. Child protection issues get referred within the FA to the CFA WO, not to local authority children's services. The FA is looking to handle abuse in-house.*

*Further note: the second bullet actually contradicts the reporting procedures in section 6.2 of this document. The subclauses of 6.2 are themselves somewhat contradictory, but certainly aren't limited to all concerns being passed to the CFA WO). It rather looks as if the reporting procedures in section 6.2 (which have a quite different writing style to them) have been pasted into this document but nobody has bothered to go through the rest of the document to ensure it is consistent with the new section. If the FA has such an unreliable approach to writing down what it expects from its people, it would be unsurprising if this this was reflected in child protection practice. It is vanishingly rare for an organisation to have good safeguarding practice without good clear written documentation defining what is expected of people.*

#### **4.2 the youth league Welfare officer**

All Youth League Welfare Officers (YLWOs) are expected to promote awareness of The FA's safeguarding children policy and procedures and best practice guidelines. The introduction of codes of conduct, appropriate sanctions and proactive requirements for affiliation such as signing up to the Respect programme will do much to safeguard children and young people. It is anticipated that the league's rules and disciplinary procedures will deal appropriately with many poor practice issues.

However, where appropriate the YLWO may be required/asked to acknowledge and support sanctions imposed by the CFA. Any concerns about a child's or young person's welfare should be reported immediately to the CFA WO.

YLWO are required by The FA to:

- Know who their CFA WO is and how to contact them
- Know who their registered clubs Welfare Officers are and how to contact them
- Ensure all their registered clubs have a safeguarding children policy
- Encourage all their registered clubs to implement The FA's Safeguarding best practice guidelines
- Promote and support as many people as possible to complete The FA's Safeguarding Children Education programme
- Have an understanding of The FA CRB and its role within safeguarding children and young people
- Advocate the importance of complying with appropriate criminal records checks via the The FA CRB and make use of the Online Safeguarding Service to monitor club compliance
- Coordinate annual CWO network gatherings for those CWO who are affiliated to their league

Youth League Welfare Officers are also advised to make use of The FA's Respect programme which will help to embed safeguards. Please refer to section 3.2. or visit – [www.TheFA.com/Respect](http://www.TheFA.com/Respect)

*From that list of items, the YLWO has no role at all in addressing child protection concerns. It's just not mentioned.*

#### **4.3 the county football association Welfare officer**

The CFA WO is a key member of The FA's safeguarding team and works closely with The FA. They will receive and collate child protection concerns in accordance with FA protocols and procedures and



deal with poor practice concerns directly. As and when required they will seek advice from The FA Case Manager, Children's Social Care, the Police or the NSPCC Helpline regarding case referrals.

Part of their role is to promote and support the aims of The FA's safeguarding children policy and procedures and The FA's best practice guidelines. They will assist the youth, mini-soccer and girls' leagues to appoint Welfare Officers. Thereafter they will maintain contact with the network of Welfare Officers to offer support and guidance where necessary. The CFA WO will also support clubs and leagues in implementing criminal records checks and can advise on making use of The FA's Respect programme.

*"As and when required". The thing is there is no legal requirement, so this commits the FA to precisely nothing. To talk of "FA protocols and procedures" without defining which ones or where they might be found is to make imposing-sounding statements that actually have no meaning or effect.*

#### 4.4 the Fa's online safeguarding service

The FA Online Safeguarding Service (FA OSS) is a tool which allows club Welfare Officers to monitor who are current members at their club/league who has completed The FA's Safeguarding Children Workshop, who still needs to and who has completed a criminal records check and who still needs to. Welfare Officers are reminded that they should be making use of The FA OSS each time they take on a new volunteer. Please note this is only available to Welfare Officers with an accepted criminal records check, Safeguarding Children Workshop (SCW) certificate and Welfare Officer Workshop (WOW) certificate. The system provides different levels of information for club and league Welfare Officers as detailed below.

This system for club Welfare Officers includes the following tools:

- Receive updates from the Equality & Children Protection (ECP) department via the Safeguarding page
- View the CRC and SCW Certificate via the Club Status screen
- Filter records by CRC Status (Accepted or Not Started)
- Remove individuals who are no longer involved with the club
- Add individuals missing from the club records
- Print the Safeguarding records of individuals at the club
- View the Safeguarding profile of an individual by clicking on an individual's FAN via the Club Status page. This includes their CRC, SCW and WOW records along with the contact details we have on record.

The system for league Welfare Officers includes the following tools:

- View the CRC, SCW and WOW information of individuals of any club within their league via the Safeguarding screen.
- View the Safeguarding profile of the club Welfare Officer by clicking on their FAN via the Safeguarding page. This includes their CRC, SCW and WOW records along with the contact details we have on record.

For more information about requesting access to this system, FAQs about the service and to access the CWO and YLWO users guide please contact your CFA Welfare Officer.

*Descriptive text with no specific requirement*

#### 4.5 everyone's responsibility; raising awareness

The network of designated persons is critical; but for clubs and leagues to be really effective in creating a well run, happy and safe club/league everyone needs to play their part.

Raising awareness of what safeguarding means for everyone will pay dividends. Make sure you encourage parents/carers as well as the club's/league's management committee to get to know your Welfare Officer(s) and also to attend The FA's Safeguarding Children Workshop.

*Descriptive text with no specific requirement*

## Section 5

### 5.0 Poor practice and abuse

Child abuse is a very emotive and difficult subject. It is important to understand the feelings involved but not to allow them to interfere with our judgement about any action to be taken. It is also important that child abuse and child protection are openly discussed as this helps create an environment where people are more aware of the issues and sensitive to the needs of children. Open discussions also create environments that deter abusers. Neglect and child abuse can occur anywhere both within and outside of the family. This includes sport, leisure, cultural, religious and care environments and on the transport to and from these places. It can also occur on-line and through social media. Recent inquiries have also indicated that abuse which takes place within a public setting is rarely a one-off event. This means that if abuse is detected, it is highly unlikely to be the first time it has happened. It is therefore crucial that all allegations and suspicions are treated seriously and appropriate actions taken.

Children may be harmed or abused by professionals, volunteers, carers, family members and by other children. The issue is the effect on the child; sometimes harm or abuse is intentional; sometimes the intent is unclear, sometimes the harm is unintended.

*Descriptive text with no specific requirement*

### 5.1 legislative framework

The Children Acts 1989 and 2004 set out duties to support families to meet the needs of children, to meet needs and to carry out enquiries where 'significant harm' is suspected. This role is given to Social Care but all agencies and organisations have a duty to work together, share information and cooperate in the best interests of the child.

Working Together to Safeguard Children 2013 is the guidance for all local authorities and all agencies whether statutory, non-statutory and including sports bodies.

*This is out of date. The 2015 edition of "Working Together to Safeguard Children" is current.*

All local authorities have Local Safeguarding Children Boards (LSCBs) which coordinate the work of the agencies, and organisations in their area.

Extra government guidance, Safeguarding Disabled Children, was produced in 2009. All individual agencies working with children will have their own child protection policies which fit into this framework.

It is not the role of The FA to investigate where significant harm to a child is suspected – but it is our role to carefully pass on to Social Care our concerns, record and report them accurately including areas we are unsure about – it is the role of the Police to investigate possible criminal offences and of Children’s Social Care to investigate risks to children and to consider how they need to be managed. The use of social media/mobile technology continues to increase and whilst they offer many benefits for football it’s important that those working with children and young people understand that appropriate boundaries must be in place in an online environment just as they need to be on or off the field of play. For more information about social media refer to section 3.4.

*We have text here describing the FA’s role “to carefully pass on to Social Care our concerns, record and report them accurately”. But don’t yet (on page 24: Section 5 of the original .pdf policy document) have any descriptions of what the FA requires any individuals to do in order to fulfil that role*

An environment that explicitly attempts to identify and report abuse helps create a safer culture for children and young people. **let’s make football safe – not sorry.**

Allegations may also relate to poor practice where an adult’s or a peer’s behaviour is inappropriate and may be causing concern to a young person within a football setting. Poor practice includes any behaviour that contravenes existing Codes of Conduct, infringes an individual’s rights and/or reflects a failure to fulfil the highest standards of care. Poor practice is unacceptable in football and will be treated seriously with appropriate actions taken. Sometimes a child or young person may not be aware that practice is poor or abusive and they may tolerate behaviour without complaint. An example of this is a child with a disability who is used to being excluded from activities or a bullied young person who is used to being mocked. Children may also be used to their cultural needs being ignored or their race abused. This does not make it acceptable.

Many children and young people will lack the skills or confidence to complain and it is therefore extremely important that adults in the club advocate for the children and young people. Advocating for children and young people who find it hard to speak out is part of creating a safer culture for them. For information about the categories of abuse and signs and indicators see Appendix 6. If you have not already attended The FA’s Safeguarding Children Workshop but would like to find out more about Safeguarding Children in football then please contact your CFA Welfare Officer.

*All descriptive text with no specific procedures or requirements.*

## 5.2 relationships of trust

The power and influence an older colleague (where an U18 has taken on a leadership role) or member of staff has over someone attending a group activity cannot be underestimated. If there is an additional competitive aspect to the activity and the older person is responsible for the young person’s success or failure to some extent, then the dependency of the younger member upon the older will be increased. This is the case in coaching. A coach has significant power and influence over his or her players and is therefore in a relationship of trust, Coaches are therefore expected to act within appropriate boundaries with their players, in relation to all forms of communication. Coaches

should be mindful of any physical contact with their players and coaches should not have intimate or sexual relationships with their players. It is therefore vital for volunteers to recognise the responsibility they must exercise in ensuring that they do not abuse their position of trust.

Genuine relationships do occur between different levels of volunteers and participants in a group; however no intimate relationship should begin whilst the member of staff or volunteer is in a position of trust over them.

The FA acknowledges that intimate relationships between teenagers take place and often no harm comes from them. However, it is also acknowledged that children and young people who suffer abuse often do so at the hands of other children or young people.

It must be understood that the notion of 'relationships of trust' applies as much to young people who have taken on a leadership role as it does to adults involved in football.

"The inequality at the heart of a relationship or trust should be ended before any sexual relationship begins". Caring for Young People and the Vulnerable? Guidance for preventing abuse of trust (Home Office 1999).

Please note: young people aged 16-18 can legally consent to some types of sexual activity; however, in some provisions of legislation (under the Children's Act 1989) they are classified as children.

"It is an offence for a person aged 18 or over to involve a child under that age in sexual activity where he or she is in a specified position of trust in relation to that child. This includes those who care for, advise, supervise or train children and young people (Sexual Offences Act 2003)".

The principle of this section of the Sexual Offences Act 2003 will be applied by The FA thus if you engage in an intimate or inappropriate relationship with a young person it is a breach of The Football Association Regulations and as such may result in disciplinary action. You can download The FA's safeguarding regulations via this link –

[www.TheFA.com/~media/files/thefaportal/governance-docs/rulesof-the-association/2014-15/025a\\_safeguarding-children-regs.ashx](http://www.TheFA.com/~media/files/thefaportal/governance-docs/rulesof-the-association/2014-15/025a_safeguarding-children-regs.ashx)

For further guidance on 'position of trust' download the CPSU 'briefing paper' via – [www.thecpsu.org.uk/resourcelibrary/2013/abuse-of-positions-of-trustwithin-sport/](http://www.thecpsu.org.uk/resourcelibrary/2013/abuse-of-positions-of-trustwithin-sport/)

*Descriptive text with no specific requirement*

### **5.3 raising awareness of potential vulnerability**

Some children may experience multiple challenges and difficulties. This could be due to family circumstances, poverty, discrimination, disability, family problems with mental health, domestic violence or substance and alcohol use. The more challenges facing a child or young person the greater their vulnerability.

This safeguarding children policy is inclusive and the same actions should be taken regardless of the needs and background of the child or young person. The FA recognises however that some children and young people are disadvantaged by their experiences and would want to highlight the following.

*Descriptive text with no specific requirement*

#### **5.3.1 Children and young people with disabilities**

Research has consistently shown that children with a disability are more at risk of abuse. Disability may be visible such as Cerebral Palsy or invisible such as a learning disability. Many things contribute to this including:

- Poor practice resulting from not understanding the care and support the child needs
- Attitudes and assumptions about disability
- Lack of awareness and the belief that disabled children are not abused
- Factors linked to the impairment i.e. it may be harder to communicate or avoid the abuser if the child depends on them
- Targeting by abusers who may believe they are less likely to tell or be believed

Because of this clubs may need to put extra safeguards in place. Best practice to build safeguards includes:

- Making sure everyone working with the child understands what the impairment actually means for the child
- Talking to the child and parents/carers to understand the child's needs
- Making sure there is a plan to meet additional needs and that this is clear and shared with those who work with the child
- Listening to what the child says and communicates by their behaviour as well as their words or signs
- Making sure the child knows who to go to and how to do so if they are worried about anything
- Observing carefully and getting to know the child and understanding how they respond to different experiences
- Reviewing the child's involvement regularly to help them get the most from the game
- Looking for the child's abilities not their disabilities!

For further information please download the 'Best Practice guidance for including and safeguarding children with disabilities' via – [www.TheFA.com/football-rulesgovernance/safeguarding/raisingawareness---downloads-section](http://www.TheFA.com/football-rulesgovernance/safeguarding/raisingawareness---downloads-section) County Welfare Officers can also offer additional guidance and signposting to other organisations who can help and advise.

Coaches can take a course called 'Coaching Disabled Footballers' which helps safely include all children.

*Descriptive text with no specific requirement*

### **5.3.2 Children and young people from minority ethnic groups**

Children and young people from minority ethnic groups are additionally vulnerable because they may be:

- Experiencing racism and racist attitudes
- Experiencing racism being ignored by people in authority
- Afraid of further abuse if they challenge others
- Subjected to myths, e.g. all people of a particular culture are good with or hit their children
- Wanting to fit in and not make a fuss

- Using or learning English as a second language.

The FA's commitment to ensuring that football is for everyone means that as more people from all communities and faiths get involved in the game, there is an increased possibility that instances of female genital mutilation, forced marriage or honour based violence may be reported or advice sought. Please refer to 5.3.3, 5.3.4 and 5.3.5 respectively for further advice and guidance. "Child trafficking is about taking children out of their protective environment and preying on their vulnerability for the purpose of exploitation". International Labour Organisation (ILO).

Any concerns about the possibility of a child or young person being trafficked should be reported via the statutory agencies. Although no precise figures exist, the ILO (in 2005) estimated that between 980,000 to 1,225,000 children - both boys and girls - are in a forced labour situation as a result of trafficking internationally.

FIFA has implemented regulations and an on-line system to monitor and control the movement of under 18s to help safeguard children and young people in football. The regulations only permit the international movement of under 18s in very limited circumstances and require the approval of FIFA before an under 18 can be registered in a new country. The FA, Premier League and Football League work closely to ensure the FIFA regulations are fully respected by English clubs. If you have any concerns about a young person involved in football then please contact your CFA Welfare Officer or The FA Safeguarding Team.

For more information please download our 'Useful Contacts' document, via – [www.TheFA.com/football-rulesgovernance/safeguarding/raisingawareness---downloads-section](http://www.TheFA.com/football-rulesgovernance/safeguarding/raisingawareness---downloads-section)

*Descriptive text with no specific requirement*

### **5.3.3 Female Genital mutilation (FGM)**

Female genital mutilation is a form of child abuse common to some African, Asian and Middle Eastern communities in the UK. This illegal and life-threatening initiation ritual can leave young victims in agony and with physical and psychological problems that can continue into adulthood. Carried out in secret and often without anesthetic it involves the partial or total removal of the external female genital organs.

The NSPCC Female Genital Mutilation (FGM) helpline offers specialist advice, information and support to anyone concerned that a child's welfare is at risk because of female genital mutilation. Though callers' details can remain anonymous, any information that could protect a child from abuse will be passed to the Police or Social Care services. Clubs should be mindful if a regular attender goes missing from a club or if a child, their peer or relative starts expressing worries about a trip abroad.

If you are worried that a child may be at risk of FGM, you can contact the 24 hour helpline anonymously on 0800 028 3550 or email [fgmhelp@nspcc.org.uk](mailto:fgmhelp@nspcc.org.uk).

If you wish to find out more about FGM then you can access the NSPCC's fact sheet via this link – [www.nspcc.org.uk/Inform/resourcesforprofessionals/minorityethnic/female-genitalmutilation\\_wda96841.html](http://www.nspcc.org.uk/Inform/resourcesforprofessionals/minorityethnic/female-genitalmutilation_wda96841.html)

*Descriptive text with no specific requirement.*

### 5.3.4 Forced marriage

A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. It is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. The pressure put on people to marry against their will can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological (for example, when someone is made to feel like they're bringing shame on their family).

The Forced Marriage Unit (FMU) operates a public helpline to provide advice and support to victims and those being pressurised into forced marriages. Of the 1,300 plus cases dealt with in 2012 40% of victims were under 18.

If you are worried that a child may be at risk of forced marriage, you can contact FMU via the helpline on 020 7008 0151 or email [fmu@fco.gov.uk](mailto:fmu@fco.gov.uk). For more information on forced marriages go to [www.gov.uk/forced-marriage](http://www.gov.uk/forced-marriage)

*Descriptive text with no specific requirement*

### 5.3.5 Honour based violence

The term 'Honour Based Violence' (HBV) is the internationally recognised term describing cultural justifications for violence and abuse. It justifies the use of certain types of violence and abuse against women, men and children.

The Association of Chief Police Officers defines HBV as: 'A crime or incident, which has or may have been committed, to protect or defend the honour of the family and/or community'. HBV cuts across all cultures, nationalities, faith groups and communities and transcends national and international boundaries. HBV is also a Domestic Abuse issue, a Child Abuse concern and a crime. If you are worried that a child may be at risk of HBV contact Children's Social Care for further advice and guidance or speak with your County FA Welfare Officer.

*Descriptive text with no specific requirement*

### 5.3.6 Supporting lesbian, gay, bisexual and transgender young people

Lesbian, gay, bisexual and transgender (LGB&T) young people come from all socio-economic backgrounds, religions, faiths, ethnicities and cultures. It is estimated that six per cent of the population is lesbian, gay or bisexual, so there's a good chance that in a group of 30 young people, at least two will be or will grow up to be lesbian, gay or bisexual. Most young people will know LGB people too, including family and friends. In addition, a 2010 piece of research, funded by the Home Office, estimated that between 300,000 and 500,000 people in the UK may identify as transgender.

However, LGB&T people remain largely invisible across sports, and two thirds of LGB young people say they don't like team sports. This lack of visibility, as well as the misapprehensions about LGB&T people, contribute to an environment of homophobia and transphobia in sport. This can potentially cause LGB&T young people to feel excluded, isolated or undervalued.

We therefore all have a role to play in dispelling myths about LGB&T people, challenging homophobia and transphobia when they occur, and creating a football environment where



everyone feels included. It's important to remember that people realise they are lesbian, gay, bisexual or transgender at different stages of their lives; so if a young person seems to identify in a certain way, it doesn't mean they will remain that way in the future. It's also worth remembering that, when young people come out or identify a wish to reassign their current gender it's often the first time they've told anyone and how they do that will often be in response to the way they think others will react. Let them decide how they feel and what, if any, identity, they feel they have, and be supportive.

"Many lesbian, gay or bisexual people in sport face discrimination simply because they are perceived to be different from the heterosexual 'norm': As well as causing many lesbian, gay or bisexual athletes to leave clubs or sport entirely, in the worst cases such negative treatment has resulted in self harm or suicide". Source: CPSU Homophobic Bullying in Youth Sport, April 2011

Every young person has the right to be treated with dignity and respect; this includes all young people who are openly lesbian, gay, bisexual or transgender or are thought to be. A club culture that permits casual use of homophobic or transphobic language makes it all the easier for players to suffer name calling and bullying. This can impact on a young person's sense of belonging, self-esteem and therein achievement.

Lesbian, gay, bisexual and transgender young people have the same needs as any other teenager. They'll enjoy, achieve and stay safe if they:

- Feel able to be themselves
- Feel valued for who they are
- Feel included and part of a community
- Have access to resources and information relevant to them
- Feel safe and supported
- Feel they have people to talk to if things aren't going so well

Don't make assumptions; it's impossible to tell whether a young person is lesbian, gay, bisexual or transgender by the way they act, talk, dress or by who their friends are. Be positive when young people come out and know what to say; offer them reassurance, listen and be supportive – direct them to where they can get further advice and guidance.

Don't discuss a young person's sexual orientation; with their parents/carers without the young person's permission.

Protect young people from bullying; all young people have the right to grow up free from fear of bullying and that includes those young people who are lesbian, gay, bisexual or transgender. Be inclusive; any football setting for young people can make sure it's inclusive by creating zero tolerance for homophobic and transphobic bullying. Make sure your club/league makes use of The FA's Equality and Anti-Bullying Policies Much of this information has been taken from materials developed by Stonewall. For further information visit [www.stonewall.org.uk](http://www.stonewall.org.uk), or to speak with someone call 0800 050 2020. The FA's equality team has more information about tackling homophobia in football, email [equality@TheFA.com](mailto:equality@TheFA.com) or visit [www.TheFA.com/equality](http://www.TheFA.com/equality)



### 5.3.7 Children and young people who take on leadership roles

Taking on a leadership role within football is intended to be an enjoyable and positive learning experience. However, coaches, club officials, players, parents/spectators in both adult and junior football often lose sight of the fact that an individual in a leadership role who is under 18 is still legally a child! As a consequence young coaches, medics and referees are open to experiencing abusive behaviour verbally, physically and emotionally. This behaviour is not acceptable in adult or youth football. The increased potential harm that verbal, physical and emotional abuse can cause to children and young people in these roles needs to be recognised.

It is important that clubs acknowledge their role in ensuring that club officials, players and spectators behave appropriately towards young people who take on such roles. It is necessary to recognise that, like adults, children and young people can and do make mistakes when they are learning, and overly critical and unsupportive responses may constitute verbal and or emotional abuse. Some young match officials have experienced physical abuse from coaches, spectators and players. Please make use of the Respect Codes of Conduct to guide appropriate behaviour and ensure those who fail to adhere to their code are dealt with accordingly. **remember failing to take action means you can become part of the problem!**

Inappropriate behaviour unchallenged can often become the norm – everyone needs to take responsibility for creating change and ensuring positive and supportive environments for children and young people involved in football, whatever their role. There is safeguarding guidance provided directly to Young Leaders when they enter into the Football Futures Programme, if you would like more information about this please speak with your CFA Welfare Officer.

From January 2015 Children in Leadership positions over the age of 14 and under 16 can take The FA's new Online course 'Be on the Ball - Safeguarding Children in football'. This helps young leaders recognise poor practice and abuse and know how to report it. It helps them keep themselves safe from harm and report concerns.

### 5.4 Dealing with bullying

No one deserves to be the victim of bullying. Everyone has the right to be treated with respect. The FA will not accept or condone bullying in football and has defined bullying as a category of abuse. It is the responsibility of everyone in football, whatever their role, to ensure that bullying is dealt with appropriately.

Bullying can be defined as:

- Physical: hitting, kicking and theft
- Verbal: name-calling, constant teasing, sarcasm, racist, sexist or homophobic taunts or comments about disability, threats and gestures
- Emotional: tormenting, mobile text messaging, ridiculing, humiliating and ignoring or isolating.

Bullying can take place anywhere but is more likely to take place where there is inadequate supervision, e.g. in the changing rooms or on the way to and from the football pitch - but it can also take place at a training session or competition. Football's competitive nature can create and even

support an environment for the bully if individuals and clubs are unaware or fail to challenge. *The bully in football can be:*

- A parent who pushes too hard
- A coach or manager who has a win-at-all-costs philosophy
- A child or young person intimidating another
- An official who places unfair pressure on a child or young person.

The damage inflicted by bullying can often be underestimated. It can cause considerable distress to children and young people, in some cases affecting their health and development. In extreme circumstances it can lead to self-harm.

*Descriptive text with no specific requirement*

#### **5.4.1 bullying as a result of any form of discrimination**

Bullying because of discrimination occurs when bullying is motivated by a prejudice against certain people or groups of people. This may be because of their gender, age, race, nationality, ethnic origin, religion or belief, sexual orientation, gender reassignment, disability or ability.

*Generally, these forms of bullying look like other sorts of bullying, but in particular it can include:*

- Verbal abuse – derogatory remarks about young female players, suggesting they are inferior to boys; or that young black, Asian or minority ethnic coaches are not as capable as white coaches; spreading rumours that a young referee is gay, or that someone or something is inferior and so they are ‘gay’ - for example, “you’re so gay!” or “those trainers are so gay”. Ridiculing a young volunteer because of a disability or mental health related issue, or because they have a physical, mental or emotional developmental delay. Referring to someone by the colour of their skin, rather than their name; using nicknames that have racial connotations; isolating someone because they come from another country or social background etc.
- Physical abuse – including hitting, punching, kicking, sexual assault, and threatening behaviour.
- Cyberbullying – using on-line spaces to spread rumours about someone or exclude them. It can also include text messaging, including video and picture messaging. Discrimination is often driven by a lack of understanding which only serves to strengthen stereotypes and can potentially lead to actions that may cause women, ethnic minorities, disabled people, lesbian, gay, bisexual or transgender people, or people who follow specific religions or beliefs, to feel excluded, isolated or undervalued. Ensure that club members know that discriminatory language and behaviour will not be tolerated in your club/league.
- If an incident occurs, members should be informed that discriminatory language is offensive, and will not be tolerated. If a member continues to make discriminatory remarks, explain in detail the effects that discrimination and bullying has on people. If it is a young person making the remarks their parents should be informed just as in any breach of the club’s Code of Conduct and AntiBullying policy
- If a member makes persistent remarks, they should be removed from the training setting in line with managing challenging behaviour procedures and the club Welfare Officer or club officials should talk to them in more detail about why their comments are unacceptable

- If the problem persists, the member should be made to understand the sanctions that will apply if they continue to use discriminatory language or behaviour
- Consider inviting the parents/carers to the club to discuss the attitudes of the youth member in line with the procedures detailed in The FA's AntiBullying template policy.

*Descriptive text with no specific requirement*

### 5.4.2 Cyberbullying

Young people are communicating more frequently online through social networking sites and via mobile – whilst a great way to communicate it also lends itself to potential abuse. Cyberbullying is when a person uses technology i.e. mobile phones or the internet (social networking sites, chat rooms, instant messenger), to deliberately upset someone. This behaviour can also be referred to as 'Trolling' when deliberately offensive comments are posted on an individual's social media pages aimed at causing upset and distress. This type of behaviour could result in legal action.

Bullies often feel anonymous and 'distanced' from the incident when it takes place online and 'bystanders' can easily become bullies themselves by forwarding the information on. There is a growing trend for bullying to occur on line or via texts - bullies no longer rely on being physically near to the young person.

Clubs and leagues have a responsibility to ensure their websites and/or social networking pages are being used appropriately and any online bullying must be dealt with swiftly and appropriately.

All young people should know that there are potential risks associated with meeting up with people they have only met online. A young lesbian, gay, bisexual or transgender person will naturally want to meet other lesbian, gay, bisexual or transgender people with similar experiences, and they will seek friends they can relate to and a community where they can be themselves. This can make them particularly vulnerable in an online environment. It's essential that they understand that healthy friendships are based on mutual respect and trust and where to turn for further advice and support. For more information visit [www.stonewall.org.uk](http://www.stonewall.org.uk) to speak with someone call 0800 050 2020.

Children with disabilities also use the online world to meet others and at times hide their disability in order to make friends and build relationships. People who pose on line as children may target disabled children and young people.

Remember that The FA's equality team has more information about tackling homophobia in football, email [equality@TheFA.com](mailto:equality@TheFA.com) or visit [www.TheFA.com/equality](http://www.TheFA.com/equality)

*Descriptive text with no specific requirement*

### 5.4.3 taking a proactive approach

- Ensure The FA's definition of bullying and its anti-bullying policy are promoted
- Ensure your club or league has codes of conduct of which an anti-bullying policy is a part; why not make use of The FA's Respect Codes of Conduct?
- Ensure that you take all signs of bullying seriously
- Raise awareness of what discriminatory bullying is and how your club or league will respond

- Develop an open environment that encourages children and young people to share their concerns; why not introduce a young person's forum into your club or league?
- Ensure you have someone regularly monitoring your club website and social networking sites  
Remember that it is not the responsibility of an individual to decide that bullying is or is not taking place in football, but it is their responsibility to act on any concerns. If your club or league signs up The FA's Respect Programme then measures should be in place to seek to prevent bullying if everyone is adhering to their Respect Code.

Download further information on developing an anti-bullying policy via –  
[www.TheFA.com/~media/files/thefaportal/governance-docs/safeguarding/raising-awareness/the-faanti-bullying-policy-for-clubs-2012.ashx](http://www.TheFA.com/~media/files/thefaportal/governance-docs/safeguarding/raising-awareness/the-faanti-bullying-policy-for-clubs-2012.ashx)



If you would like to find out more about organisations who can provide support if young people are experiencing bullying whether online or directly please visit [www.anti-bullyingalliance.org.uk](http://www.anti-bullyingalliance.org.uk)

The FA is proud to support the National Anti-Bullying Alliance annual 'anti bullying week', if you would like your club or league to get involved then ask your CFA Welfare Officer for more details or visit their website (as detailed above) to find out about the latest week of action.

*Descriptive text with no specific requirement*

## 5.5 reducing the potential for vulnerability

Bearing in mind that children and young people can be and are disadvantaged by these and other experiences, it is important for all clubs, leagues and County FAs to be extra vigilant in creating a safe culture, including:

- Finding ways of understanding and communicating with all children and young people
- Ensuring best practice at all times in physical and health care
- Developing knowledge of the diverse cultures they serve
- Respecting cultural differences
- Promoting positive environments and behaviours in which difference (in a variety of senses) is embraced

- Building relationships with parents and carers and including all families in club activities
- Observing carefully changes in mood, appearance and behaviour and discussing those concerns with families, carers or the Welfare Officer if suspicions or concerns are significantly aroused about the care of the child or young person
- Acknowledging that disabled children and young people are additionally vulnerable and that vigilance is essential
- Acknowledging that abusive behaviour directed towards a minor whilst they are carrying out a leadership role is not acceptable and will be reported to the appropriate designated person as poor practice and or abuse
- Raising awareness of what discriminatory bullying is, how you will respond and ensure effective reporting systems are in place to enable members to report incidents
- Implementation of a club code of conduct for spectators and players
- Acceptance of the special role club officials have in setting a good example of the way in which people should behave towards children and young people in leadership roles.

It may be necessary to ask other specialist agencies for help and advice in including some children and young people in football. It should be seen as a strength of the club and league to approach families, Education, Health, Social Care, voluntary agencies and community groups for advice on including and protecting particular children.

The mentoring of young match officials is particularly helpful in supporting them if they are faced with abusive behaviour and indeed preventing the continuation of such behaviour. The mentors role is to support, assist and help the young referee develop their confidence and offer effective guidance. They can offer support should the young referee be subjected to abusive side-line behaviour and be on hand to prevent this. It's vitally important the mentor ensures the referee is able to enjoy the game as much as the players. Further information can be obtained via The FA's Referees Department 0800 169 1863.

It's recognised that empowering children and young people helps to protect them; ensure your club or league is effectively communicating with its young members and listening to their needs and suggestions for change. The FA provides safeguarding guidance for children and young people; this can be viewed via – [www.TheFA.com/football-rulesgovernance/safeguarding/be-on-the-ball](http://www.TheFA.com/football-rulesgovernance/safeguarding/be-on-the-ball)

*Descriptive text with no specific requirement*

## Section 6

### 6.0 responding to concerns, allegations and disclosures\*

\*The term disclosure in this context is used to describe the sharing of child protection concern(s) by one individual to another and not the Disclosure Barring Service formal record of an individual's relevant convictions.

**There is a legal and moral responsibility to report any concerns about a child or young person in any context.** The FA will support anyone who, in good faith, reports his or her concern that a

colleague is, or may be, abusing a child or young person, even if that concern is proved to be unfounded. The following guidelines are relevant whether or not the child or young person is

involved in football. It is essential that you follow The FA procedures for any concerns that are related to football settings.

***There is no legal responsibility to report concerns.***

*Note that what is being described below is “The following guidelines”. Guidelines are discretionary. If the FA genuinely believed that there is a “legal responsibility” to report child protection concerns, then in order to ensure that clubs are aware of their legal responsibility and know how to fulfil it, the reporting procedures described in this clause would be described as essential mandatory procedures rather than merely “guidelines”.*

*Even though there is in fact **no legal obligation** to report abuse, the FA could make it a membership obligation by describing these as essential procedures, and using the word “must” to make it clear that member clubs do not have discretion in whether or not report abuse, and that failure to report abuse will result in disciplinary sanctions against the club. But the language used is much weaker. These reporting procedures are mere “guidelines.” The word “should” is used throughout rather than “must”, again offering discretion in whether the guidelines are followed.*

Concerns may arise because:

- A child or young person informs you directly that he or she is concerned about someone’s behaviour towards them
- You become aware, through your own observations or through a third party, of possible abuse occurring.

Most suspicions of abuse come about from observation of changes in the child or young person’s behaviour, appearance, attitude or relationship with others. Your suspicions may develop over time (see Appendix 6 Signs and Indicators of Abuse). Where the concern does not involve individuals in football settings, the matter should be reported directly to local Children’s Social Care or the local Police.

## **6.1 What to do if a child or young person discloses to you**

If a child or young person informs you directly that they are concerned about someone’s behaviour towards them, this is known as a disclosure. A disclosure may be given slowly over time or all at once and it may seem incomplete, unclear and may sometimes be retracted. Children don’t often tell in one simple ‘disclosure’.

The person receiving the disclosure should:

- React calmly so as not to frighten the child or young person
- Ensure the immediate safety of the child or young person
- Tell the child or young person that he or she is not to blame and that he or she was right to tell
- Take what the child or young person says seriously
- If the child or young person needs immediate medical treatment, take them to hospital or telephone for an ambulance, inform doctors of concerns and ensure that they are aware that this is a child protection issue as it is their responsibility to refer this on appropriately to the Police or Children’s Services

- When speaking with the child or young person keep any questions to the absolute minimum. Ask only what is necessary to ensure a clear understanding of what has been said
- Re-assure the child or young person but do not make promises of confidentiality or outcome, which might not be feasible in the light of subsequent developments
- In the event of suspicion of sexual abuse try to avoid the child bathing or showering until given permission to do so. Washing can destroy valuable evidence
- Take a detailed written record of what the child said to you
- As soon as the child or young person completes the disclosure make sure you accurately record what they said using their language and of any actions you may have taken as a result
- Inform the parents/carers immediately unless you have a specific reason not to, e.g. the child has named the parent/ carer as the abuser. If this is the case then contact the Welfare Officer. If they are unavailable contact local Children's Social Care or the Police for guidance.

*Apart from the fact that the word "should" rather than "must" is used throughout, the guidance in 6.1 is fairly good until the last bullet, which is terrible. The Club Welfare Officer should **always** be the first person contacted. From there a disclosure of abuse should go to local authority children's services, who will be in a position to decide whether the parents should be informed.*

*This last bullet also contradicts items 9(iii) and 9(v) of the Club Template safeguarding policy. It also contradicts the procedures in the flow charts in sections 6.2.4 and 6.2.5 of this document. Which is to be treated as authoritative, the text or the flowchart?*

*How can anybody be expected to know what to do when different documents from the same source advocate different courses of action?*

## 6.2 the FA's reporting procedures

Whether informed directly by a child or young person, via a third party, or through your own observations within a football setting, you should follow The FA Procedures outlined below and in the flow diagrams on pages 37, 38 and 39.

*Note "should". Not "must" again. It's discretionary. Even though there is no legal obligation to report abuse, the FA is wholly entitled to say "must" within its own procedures. Unless it does, it becomes very hard to justify any disciplinary action against anyone who fails to follow the procedure.*

*This reporting procedure contradicts the last bullet of 6.1., which expects the person receiving an allegation to inform a child's parents unless there is good reason not to. That is absent from the reporting procedures described within 6.2 and its subclauses.*

- Ensure the immediate safety of the child or young person
- If the child or young person needs immediate medical treatment, take them to hospital or telephone for an ambulance, inform doctors of concerns and ensure that they are aware that this is a child protection issue



- Report the concerns to the designated person for child protection or the person in charge immediately, unless the concern is about this individual

*“the designated person for child protection” is a term **not** previously defined in the document. It seems they mean the club welfare officer, but this is not explicitly stated anywhere. It appears that this text has been imported from elsewhere without any attempt at adapting it to the document it has been pasted into. It seems likely that the author of this document was not very aware of what (if any) reporting arrangements the FA previously had, and therefore what changes elsewhere in the document needed to be made as a result of pasting this text in.*

- If the designated person is not available, or the concern is about this person, report your concerns directly to the local Children’s Social Care, the local Police or the NSPCC Child Protection Helpline
- If the child has a disability or extra communication needs share the needs with the people you report to so they can communicate effectively with the child or young person
- These agencies will advise you whether a formal referral to Children’s Services is necessary and what further action you might need to take. If you are advised to make a formal referral make it clear to Children’s Social Care or the Police that this is a child protection referral
- All Police forces have dedicated Child Protection Teams (CPTs) which deal with allegations of abuse within the family setting and by people in a position of trust. In a real emergency dial 999 to involve the full squad
- Remember if the concern is about someone involved within a football setting and you are unable to contact the Welfare Officer in your club/league or CFA, then you should also inform The FA’s Safeguarding team on 0800 169 1863 Extension 6300 or 6400 or via email on [safeguarding@TheFA.com](mailto:safeguarding@TheFA.com) and let them know what action, in line with FA procedures, you have taken.
- The flow diagrams on pages 37-38 explain how to deal with a concern about possible poor practice and or child abuse within a football setting. The following definitions on page 36 will help you to decide whether the issue is likely to be poor practice or abuse. If you are at all unsure make sure you seek guidance from your club or league Welfare Officer or CFA Welfare Officer as appropriate.
- If you decide the concern relates to poor practice follow flow diagram 1 on page 37. If you decide that the concern relates to abuse use flow diagram 2 on page 37. If you decide that the concern relates to concerns outside of a football setting use flow diagram 3 on page 38.

*This procedure is again different from that stated in the template club safeguarding policy. The template club safeguarding policy only mentions reporting concerns to the CFA WO. There is no mention of any circumstance under which the Club Welfare Officer should refer any concerns to outside organisations such as local authority children’s services.*

### 6.2.1 Dealing with possible poor practice and/or abuse in a football setting

You become aware of a poor practice and/ or possible abuse situation.

- Stay calm
- If child or young person is present reassure him or her they are not to blame



- Don't make promises of confidentiality or outcome
- Keep questions to a minimum
- Is the concern poor practice or child abuse?
- Write down what the child has said using their words and phrases or the signs and gestures they used For clarification concerning poor practice concerns see page 37. If the concern is child abuse follow flow diagram 2 on page 38. If you are not sure talk to the designated person and ask their advice, if the concern is poor practice:

Contact the CWO who will either:

- Follow club procedures for a first report of poor practice, complete and submit The Affiliated Football referral form to the CFA WO for information only
- Seek advice from the CFA WO

Where appropriate the CFA WO will either:

- Give advice for the CWO to action
- Monitor the behaviour of individual or club as required
- Gather additional evidence
- Refer concerns to The FA's Safeguarding team for advice

Where deemed appropriate, contact will be made with and action taken by:

- CFA Disciplinary Committee
- CFA FDO or CDM
- YLWO

Possible outcomes:

- Further information requested
- Advice/warning as to future conduct/sanctions
- Further training/support needed
- No case to answer
- Referral to FA's Safeguarding team for action
- All appeals regarding County FA decisions will be dealt with via CFA complaints procedures\*

(\*refer to the current FA Handbook)

### **6.2.2 Distinguishing between child abuse and poor practice**

Concerns identified as child abuse will fall within the following five categories:

**Physical Abuse;** A child is physically hurt or injured by an adult or an adult gives alcohol or drugs to a child or young person

**Neglect;** A child's basic physical needs are consistently not met or they are regularly left alone or unsupervised

**Sexual Abuse;** An adult or peer uses a child or young person to meet their own sexual needs

Emotional Abuse; Persistent criticism, denigrating or putting unrealistic expectations on a child or young person

Bullying; Persistent or repeated hostile and intimidating behaviour towards a child or young person.

Incidents of poor practice occur when the needs of children and young people are not afforded the necessary priority, so that their welfare is compromised.

For example:

- When insufficient care is taken to avoid injuries (e.g. by excessive training or inappropriate training for the age, maturity, experience and ability of players)
- Giving continued and unnecessary preferential treatment to individuals and regularly or unfairly rejecting others (e.g. singling out and only focusing on the talented players and failing to involve the full squad)
- Placing children or young people in potentially compromising and uncomfortable situations with adults (e.g. changing in a 1:1 situation with a young referee)
- Allowing abusive or concerning practices to go unreported (e.g. a coach who ridicules and criticises players who make a mistake during a match)
- Ignoring health and safety guidelines (e.g. allowing young players set up goal posts unsupervised by adults)
- Failing to adhere to the club's codes of practice (e.g. openly verbally abusing the referee)
- When a child's impairment related needs have not been taken into account

There is evidence which indicates that some children and young people have experienced what may be referred to as 'initiations more commonly now referred to as 'hazing'' into a sports club or team; often a historical practice which may have been started with good intentions but can result in oppressive, intimidating and abusive behaviour. Hazing; is any action or situation, with or without the consent of the children and young people, which recklessly, intentionally, or unintentionally endangers the mental, physical, or emotional wellbeing of a child or young person. Reported concerns of hazing will be taken seriously and appropriate actions taken.

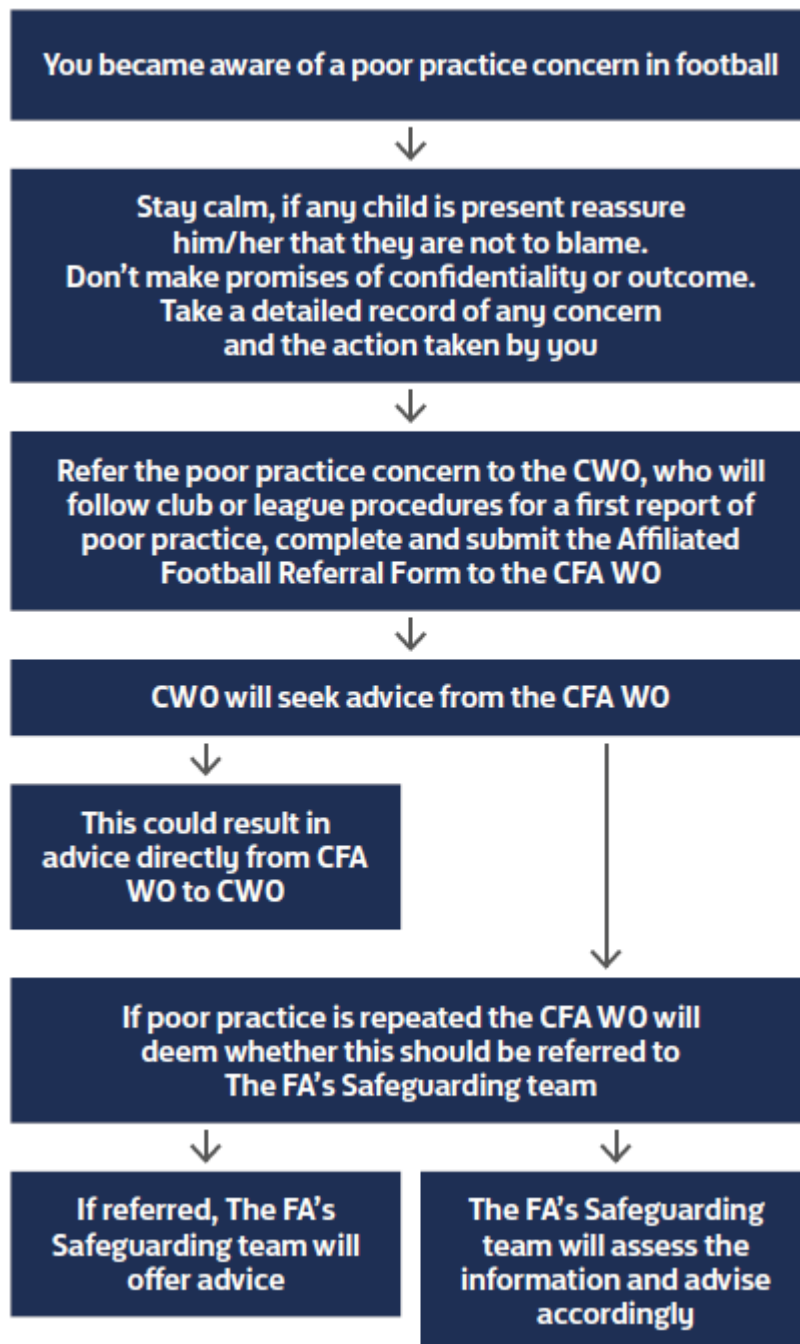
Please note:

- The assessment about whether an incident is one of child abuse or poor practice (or hazing) may not be able to be made at the point of referral, but only after the collation of relevant information
- The majority of poor practice concerns can be dealt with by the club or alternatively with support and guidance from the County FA
- All child abuse will be dealt with by The FA (in conjunction with the statutory agencies) and with the support of the County FA
- For further clarification concerning abuse concerns see Appendix 6.

*This is all backwards. The description of things that might need to be reported as abuse comes **after** the description of how to report, within a section on how to distinguish between abuse and poor practice. Moreover while there is a detailed set of examples of poor practice immediately to*

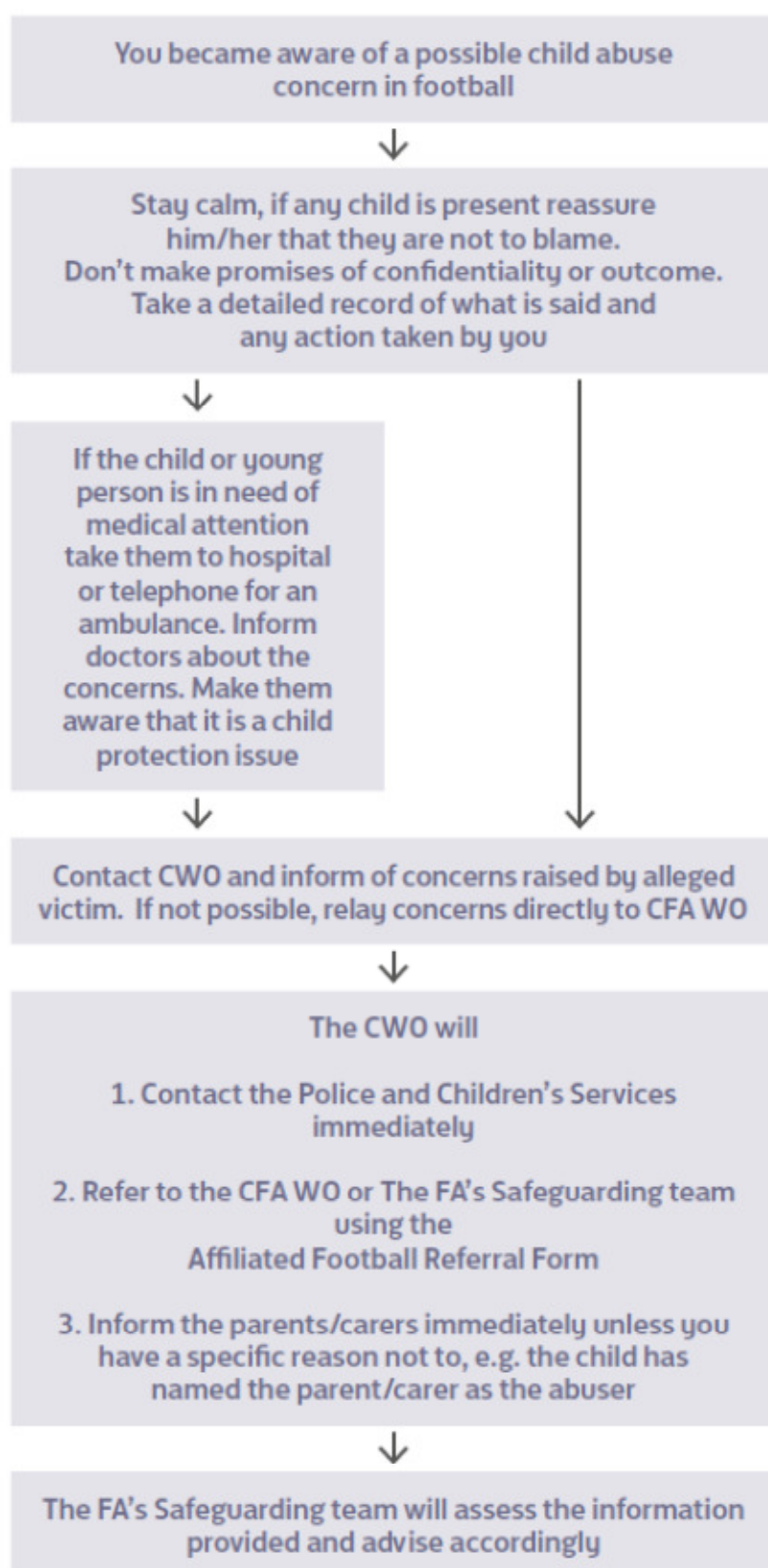
*hand, examples of indications of abuse that people should be on the lookout for are relegated to an appendix.*

### 6.2.3 Flow diagram 1: dealing with possible poor practice in a football setting



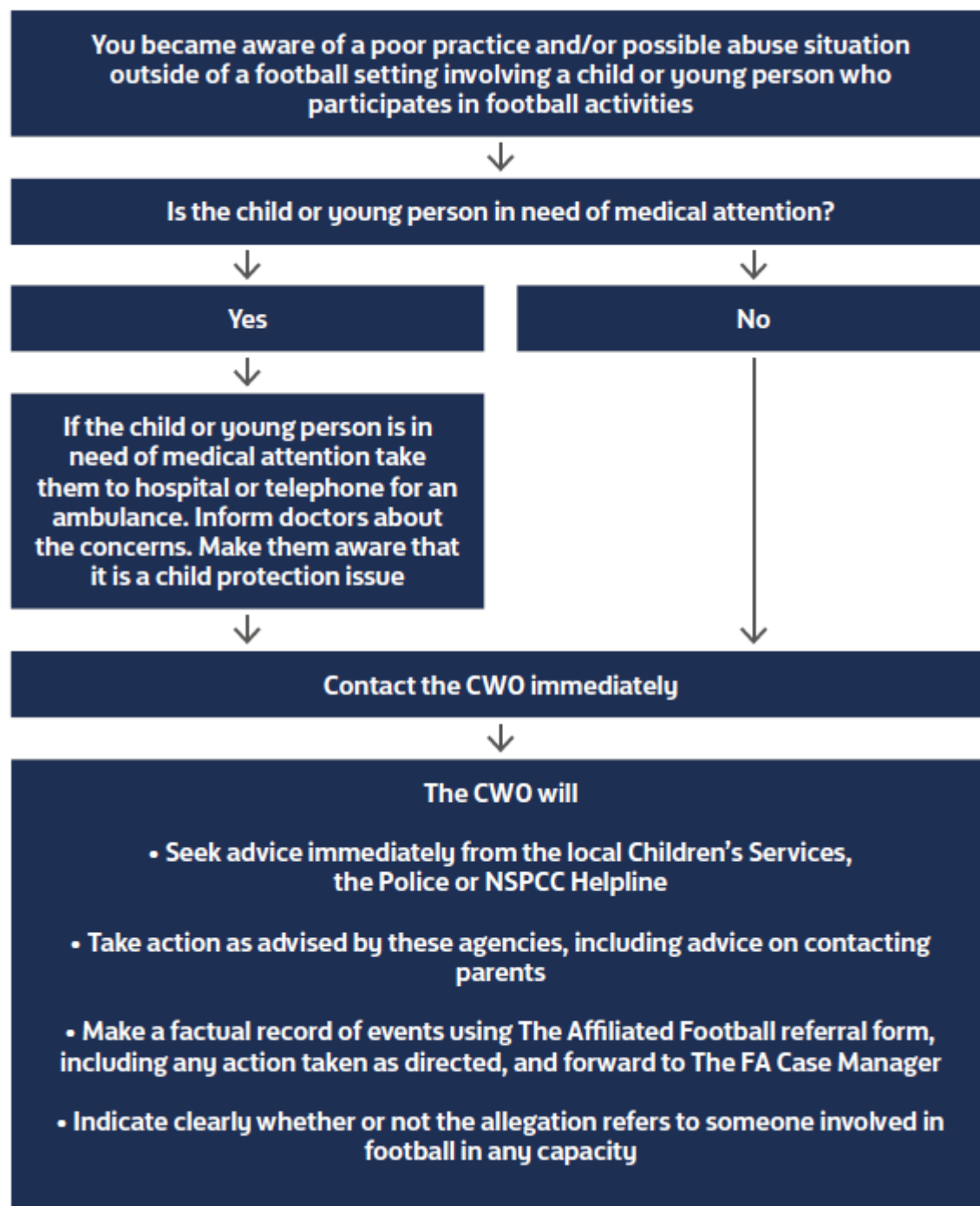
NB If the designated person is not available, or the concern is about this person, report your concerns directly to The FA Safeguarding team

#### 6.2.4 Flow diagram 2: dealing with possible child abuse in a football setting



NB If the designated person is not available, or the concern is about this person, report your concerns directly to the local Children's Social Care, the local Police or the NSPCC Child Protection Helpline

### 6.2.5 Flow diagram 3: dealing with concerns outside of a football setting



NB If the designated person is not available, or the concern is about this person, report your concerns directly to the local Children's Social Care, the local Police or the NSPCC Child Protection Helpline

*Whenever you have both flowcharts and text describing the same procedure, there is always the possibility that they may differ, even if only in their scope for varying interpretations. Always one or other should be defined as the authoritative procedure.*

*In this case, it wouldn't matter even if they were wholly different, because according to the first paragraph of section 6.2 people only "should" follow either. It's discretionary despite the policy document wrongly informing in section 6.0 that there is a 'legal' duty to report.*

### **6.2.6 Concerns outside of a football setting**

You may receive information regarding the welfare of a child or young person who is involved in football, yet the concern itself does not relate to someone within the game. In these circumstances (e.g. the concern relates to the child's home or a social setting other than football) you need to follow The FA Procedures outlined below:

- Follow the guidance on page 34 if the child or young person informs you directly
- If your concerns are via a third person or through observation, report your concerns directly to the CWO
- If you are unable to contact the CWO immediately or the CFA WO refer your concerns directly to local Children's Social Care or to the local Police
- These agencies will advise you whether a formal referral to Children's Social Care is necessary and what further action you might need to take. If you are advised to make a formal referral make it clear to Children's Social Care or the Police that this is a child protection referral
- Make a factual record of events using 'The Affiliated Football Referral Form' including any action as directed, indicating clearly whether or not the allegation refers to someone involved in football. Forward this to The FA Case Manager.

*This procedure is not the same as the flowchart covering the same topic in the previous clause. For instance the flowchart doesn't offer the option for an individual to contact children's services directly if the CWO is unavailable, and the text of the last two bullets should make it clear that the actions described should normally be carried out by the CWO. Between them there is a mixup as to who is supposed to be doing what. For something as critical as a reporting process for child abuse, that's really not good enough. This procedure has to be clear enough to be operated by people who aren't social workers, who are in many cases volunteers at the football club.*

### **6.3 recording of suspicions, concerns or events**

- Accurate recording is essential, as there may be legal proceedings at a later date. Referrals to Children's Social Care or Police should be confirmed in writing within 24 hours - if not, then at the earliest opportunity
- Keep a record of the name and designation of the Children's Social Care member of staff or Police Officer to whom concerns were passed and record the time and date of the call in case any follow-up is needed
- Ensure all information is maintained safely in accordance with data protection legislation
- Information should only be shared on a strictly 'need to know' basis

- Complete Appendix 7 (Affiliated Footballs Referral Form) and send this to the CFA WO. The CFA WO in turn will send this onto The FA's Safeguarding team.

*The problem here is that it's all passive voice. The section doesn't say **who** is supposed to be doing the recording.*

## Section 7

### 7.0 the Fa safeguarding team

In case of child abuse or alleged child abuse, The FA's safeguarding team will:

*Is this a statement of fact referring to a procedure defined elsewhere? If not, then "must" the right word, not "will".*

- Complete an initial assessment on the alleged perpetrator and take any action required to safeguard children, pending further Police and Children's Social Care inquiries
- Assess all individual cases under the appropriate FA misconduct and disciplinary procedures, irrespective of the findings of the Children's Social Care or Police inquiries
- Decide whether the nature of the concerns need to be dealt with by The FA Disciplinary Commission
- Support all Welfare Officers in carrying out their role and responsibilities
- Inform individuals when they are the subject of a child protection concern and provide a point of contact to keep the alleged perpetrator informed of proceedings
- Decide and advise on any contact with the media
- Monitor the types and volume of poor practice and child abuse referrals and utilise this information to inform its educational programmes and develop The FA referral process
- Decide whether a member of staff or volunteer can be reinstated and how this can be handled sensitively.

Decisions about reinstatement may be difficult. The FA, advised by the Police and Children's Social Care and/or the NSPCC, will reach a decision based upon the available information. This could suggest that, on a balance of probability, it is more likely than not that the allegation is true, regardless of any decisions relating to criminal prosecutions. The welfare of children and young people should always remain paramount. NB. The FA is entitled to carry out its own investigations independently of the Police and Children's Social Care and does so regularly where it believes this is necessary.

*One important point missing from this is the process for a temporary suspension from duties pending the outcome of investigations. This is a common feature of the safeguarding policies of other organisations (such as schools) but it is absent from the FA process. The last bullet in the list above implies that a suspension can occur, but no procedure is described. This is a major omission from the FA procedure.*

### 7.1 Possible outcomes



Cases of poor practice will be investigated by the CFA and may be subject to CFA disciplinary procedures. Cases of child abuse (having been dealt with by the statutory agencies) will be investigated by The FA's Safeguarding team who may refer the case to The FA Safeguarding Review Panel. In these circumstances, the following outcomes are possible:

- No case to answer
- Advice and or warning as to future conduct
- Further support or training
- Supervision and or monitoring
- Suspension.

*A further possible outcome should be considered; that the reported behaviour actually amounts to a concern about child abuse, and should be handled as a child abuse allegation. The distinction between abuse and bad practice is not very clear and it may well be that a concern about bad practice reveals abuse concerns on further investigation.*

## 7.2 “Whistle-blowing”

Whistle-blowing can be used as an early warning system or when it's recognised that appropriate actions have not been taken. It is about revealing and raising concerns over misconduct or malpractice within an organisation or within an independent structure associated with it.

Any adult or young person with concerns about a colleague can also use whistle-blowing by contacting The FA's Safeguarding team on 0800 169 1863 Extension 6300 or 6400 or via email on [safeguarding@TheFA.com](mailto:safeguarding@TheFA.com). Alternatively you can go direct the Police or Children's Social Care and report your concerns there.

*We have to rely on whistleblowing at present because the FA's reporting procedures are discretionary and no law exists requiring known or suspected abuse to be reported.*

## 7.3 appeals

The appeals procedure is available to anyone who is subject to a decision made by The FA Safeguarding Review Panel or the Head of Judicial Services. Every individual and organisation wishing to appeal against decisions by The FA must do so in writing, to be received by The FA Head of Judicial Services, The Football Association, Wembley Stadium, PO Box 1966, London SW1P 9EQ within 14 days of the date of notification of the decision appealed against. The appeal must identify the specific decision(s) being appealed and set out the grounds of appeal and the reasons why it would be substantially unfair not to alter the decision. A fee of £100.00 must be enclosed with the appeal. The FA Disciplinary Appeal Panel will exclude anyone who sat on the initial decision-making panel and will consist of an independent Chair and two other members. Further information regarding The FA Appeals Procedure can be downloaded via – [www.TheFA.com/~media/files/thefaportal/governancedocs/rules-of-the-association/201415/031e\\_disciplinary-procedures--appeal-regulations.ashx](http://www.TheFA.com/~media/files/thefaportal/governancedocs/rules-of-the-association/201415/031e_disciplinary-procedures--appeal-regulations.ashx)



## 7.4 Complaints procedures

A complaint may be made by an individual who has been the subject of a poor practice or child protection concern that has been dealt with by The FA's Safeguarding team. Please note, any matters relating to appeals with regard to Disciplinary Hearings, Suspensions and the Rules of The Association and Laws of the Game will be separately dealt with under established procedures and are not the subject of a complaint.

In the first instance the complainant is required to contact The FA Case Officer responsible for the relevant County FA (the contact details can be obtained from the County FA or on [0800 169 1863 Extension 6300 or 6400](tel:08001691863) or via email on [safeguarding@TheFA.com](mailto:safeguarding@TheFA.com)). It is hoped that the member of staff will be able to resolve the complainant's concerns and give appropriate assurances regarding the management of the case in question. A record of this resolution will be made and copied to the complainant. If the complainant is dissatisfied with the response and wishes to take the matter further, they are required to put the matter in writing to The FA Case Manager, The Football Association, Wembley Stadium, PO Box 1966, London SW1P 9EQ within 28 days of the known outcome of the informal communication with The FA Case Officer. Further information about The FA's appeals process can be downloaded from The FA Handbook via – [www.TheFA.com/~media/files/thefaportal/governance-docs/rules-of-theassociation/2014-15/031e\\_disciplinaryprocedures---appeal-regulations.ashx](http://www.TheFA.com/~media/files/thefaportal/governance-docs/rules-of-theassociation/2014-15/031e_disciplinaryprocedures---appeal-regulations.ashx)

## 7.5 allegations of previous (historical) abuse

Allegations of abuse may be made some time after the event. This may be by an adult who was abused as a child, by a volunteer or member of staff who is still currently working with children or young people or by a young person.

Where such an allegation is made, you should inform the CFA WO who will in turn inform The FA's Safeguarding team. Historical allegations should be treated with the same care and attention as current disclosures.

The FA will, following consultation, take appropriate action. This is because other children or young people, either within football or outside it, may be at risk from this person and anyone who has been abused has the right to be heard at any time. This position is reinforced by UK legislation and guidance.

*"Appropriate action" is meaningless if not defined. The last sentence about being reinforced by UK legislation and guidance is factually incorrect- there is no law requiring employees or volunteers in a Regulated Activity to report known or suspected abuse.*

## 7.6 Providing support

The FA will support anyone who, in good faith, reports his or her concern that a colleague is, or may be, abusing a child or young person, even if that concern is proved to be unfounded, in the following ways:

*We have "will" again, suggesting a statement of fact rather than a procedure. Moreover the statement applies to the FA as a whole without putting any specific duty on any individual employee, volunteer or officer.*

- Via the CFA Welfare Officer

- Via The FA's Safeguarding team
- Provision of specialist independent organisations contact details
- NSPCC Helpline and ChildLine
- NSPCC Child Protection in Sport Unit.

*Apart from that baffling item "provision of specialist independent organisation's contact details" which seems not to fit at all within the list, it appears that the FA is only prepared to support people who report concerns **within the FA**. That's a really bad line to take.*

Consideration will be given to what support may be appropriate for children, young people, parents or carers, volunteers and members of staff during and after poor practice and child abuse referrals to The FA.

It is never easy to respond to a child or young person who tells you that they are being abused. You may well be feeling upset and worried yourself. Confidentiality is paramount. However, The FA acknowledges that having received a disclosure, individuals may have a need for some support. To download information on support groups and help lines for those who have received a disclosure please use this link – [www.TheFA.com/footballrules-governance/safeguarding/raisingawareness---downloads-section](http://www.TheFA.com/footballrules-governance/safeguarding/raisingawareness---downloads-section)

Every effort will be made to ensure that any child or young person, who has been subjected to poor practice or abuse, and their parents or carers, will be given support from the appropriate agencies and The FA. A list of independent support groups and help lines is available for those who have experienced abuse. To download use this link – [www.TheFA.com/footballrules-governance/safeguarding/raisingawareness---downloads-section](http://www.TheFA.com/footballrules-governance/safeguarding/raisingawareness---downloads-section)

The FA will also consider what support with the process may be appropriate for those against whom a complaint of poor practice or an allegation of abuse has been made. To download information on support groups and help lines please use this link - [www.TheFA.com/footballrules-governance/safeguarding/raisingawareness---downloads-section](http://www.TheFA.com/footballrules-governance/safeguarding/raisingawareness---downloads-section)

## appendix 1

### the FA's definitions of child, young person, abuse and harm

The FA recognises that the terms '**child or young person**', '**abuse**' and '**harm**' are open to interpretation and challenge but for the purpose of this safeguarding children policy they are defined as follows:

A **child or young person** shall be defined as: '*anyone who has not yet reached their 18th birthday.*'

**abuse** shall be defined as:

'a violation of an individual's human or civil rights by any other person or persons and, for the purposes of safeguarding children, shall include physical abuse, emotional abuse, sexual abuse, neglect and bullying.'

**Harm** shall be defined as:

*'Ill treatment and forms of ill treatment (including sexual abuse and forms of ill treatment which are not physical) and also the impairment of or an avoidable deterioration in physical or mental health and the impairment of physical, intellectual, emotional, social or behavioural development.'*

**'Harm'** may be caused by acts of commission and acts of omission.

*This appendix is only referred to in descriptive text not including any procedures.*

## appendix 2

### Safeguarding children policy and procedures – club template



# Respect



## Safeguarding Children Policy and Procedures

Club Template

### Using this Policy

This policy template is provided so that you can add your club name to the relevant sections. It is important that this policy is discussed by the committee. The club needs to be sure it is clear about its responsibilities and that it adheres to this policy in full. Having a proactive Club Welfare Officer is an integral requirement of this policy.

### Football Club Safeguarding Children Policy

- 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.
- 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.

Football Club recognises that this is the responsibility of every adult involved in our club.

### 3. 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.

### 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 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

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.

TheFA.com/football-rules-governance/safeguarding Let's make football safe – not sorry

Download via – [www.TheFA.com/football-rules-governance/safeguarding/raisingawareness---downloads-section](http://www.TheFA.com/football-rules-governance/safeguarding/raisingawareness---downloads-section)

*The document referred to above, the “Safeguarding Children Policy and Procedures - Club Template” has been separately analysed, and differs at several important points from the equivalent sections of this document. In particular the arrangements for reporting child protection concerns are much briefer and make no mention of reporting anything to anybody apart from the CFA WO.*

## appendix 3

### Guidance for developing a club health and safety policy

The type and ownership of facilities will shape the policy and procedures that you need to have in place. Having a Club ‘Health and Safety Policy’ really means applying common sense to the use and maintenance of your pitch(es) and facilities to ensure that you have a safe environment in which to carry out the club’s football activities and meet the needs of all users including those with disabilities. If you are using local authority facilities, e.g. local sports centre or school, there will already be a health and safety policy in place for these facilities. It is your responsibility to ask for the regulations and best practice guidance relating to usage of these facilities and to ensure they are suitable for all. Make sure you find out the needs of your members, what your club is responsible for and what the provider is responsible for. This should be clearly indicated when initially hiring the facility. If the club owns the facilities there will have had to be a health and safety policy as part of the development of the facility so check who holds this information within the club and what regulations and best practice guidance the club has in place already.

#### recommended action

- Make sure the club’s management committee is aware of the need for procedures relating to health and safety and takes ownership of this responsibility
- Ensure the club has public and civil liability insurance and follows the expectations of the insurance policy
- Establish where and how access is gained by emergency services to the pitch/club house
- Sign up to and abide by The FA’s Goalpost Safety Guidance (see appendix 10)
- Check the pitch before use for obvious dangers e.g. broken glass, drinks cans
- Ensure goalposts are erected appropriately and always supervised by adults
- Establish where the nearest phone is
- Establish those individuals who have a recognised emergency first aid qualification within the club
- Establish emergency procedures within the club and ensure all coaches/ managers are aware of these procedures
- Utilise The FA’s guidance for travel and trips when transporting club members to and from football activities and when organising trips away. Download information via – [www.TheFA.com/ football-rules-governance/safeguarding/ raising-awareness---downloads-section](http://www.TheFA.com/football-rules-governance/safeguarding/raising-awareness---downloads-section)

- Have an Incident/Accident Report Form.

## **Guidance for developing a club complaints and disciplinary policy**

### **The disciplinary process**

Many clubs will already have in place codes of conduct for players, spectators, coaches and officials. If a club is yet to have implemented codes of conduct this is your starting point. Codes are only effective if there is a disciplinary process to support them. It is essential that the club is fair and consistent. The following options can be considered:

- Verbal warning
- Written warning
- Exclusion from specified number of matches
- Exclusion from specified number of training sessions
- Removal from team for remainder of current season
- Exclusion from the club
- Refusal to register with team for future season.

It is recommended that the sanctions are built up or a combination of lighter sanctions issued and that it is hoped that exclusion would only be used as a last resort for serious breaches or where other measures have not been effective. Once a decision has been taken it is not easy to reverse the decision. It is much simpler to add an additional sanction or increase the number or period of time being utilised. Ultimately, of course, all clubs will be guided and required to follow the league(s) to which they are affiliated, County Association and FA rules. Experience of dealing with issues will in turn help to inform and develop the club's disciplinary process.

### **Having a complaints process**

For those clubs which have clearly stated and communicated the club's philosophy, what it can offer to and what it expects from, players, spectators, coaches and officials, this will limit potential complaints. Most complaints can be dealt with by referring individuals to club policies and procedures. However, where there are complaints which cannot be satisfied via these routes their needs to be a procedure for dealing with these. **The following options can be considered:**

- Complaints can be submitted in the first instance to the CWO. Alternatively where the issue relates to a technical aspect the concern can also be submitted to the appropriate age group coach. If the complaint relates to the CWO it should be sent directly to the Club Chairman and Club Secretary.
- Complaints can be directed to the club chairman
- All complaints must be submitted in writing
- If an individual is unhappy with the outcome of their original complaint they can appeal to the club management committee
- The outcome of an appeal to the club management committee is final Individuals have the right to seek guidance from the County FA where they feel they have been unfairly treated by the club's management committee. Please note, all clubs must be aware of the County disciplinary process which may decide that a punishment is required following a report from a referee or any participant. Any sanctions made must take into account the time it will take a County FA to deal with a case. They must not expect a County FA to take into account any action taken by the club

when dealing with cases against players, coaches and officials of their club although this can be included in any club mitigation submission.

*While it's a good idea for a club to have all these policies, it's not clear what this appendix is doing in this document*

## appendix 4

### Welfare officer person specification and suitability checklist

Person Specification		
essential	evidenced	no evidence
experience of dealing or working with young people		
knowledge and understanding of safeguarding children issues <sup>1</sup>		
a good communicator in a variety of situations with people from diverse backgrounds		
Committed to and ability to abide by the Fa rules and regulations and promote the Fa's respect programme and safeguarding children education programme		
empathy when dealing with individuals, sometimes in demanding situations		
ability to listen and assess situations fairly ability to handle confidential information sensitively and with integrity		
reasonable level of administration experience and how to deal with confidential documentation		
Willingness to attend in-service training facilitated by either the Fa or the local County Fa		
<b>Desirable</b> knowledge and understanding of grassroots football	<b>evidenced</b>	<b>no evidence</b>
access to the internet ability to use emails		

Suitability Checklist		
essential	evidenced	no evidence
Willing and able to provide relevant current references		
Previous experience of dealing or working with young people knowledge of and positive attitudes to equal opportunities		
Commitment to treat all young people as individuals and with equal concern		
Physical health – appropriate to carry out tasks		
Integrity and flexibility at least 18 years of age		
Completion of the Fa CrC Disclosure process and acceptance by the Fa of the outcome <sup>2</sup>		
Understanding of the need for confidentiality when dealing with issues		
reasonable level of administration experience and how to deal with confidential documentation		
Completion of the Fa's Safeguarding Children and Welfare officer Workshops		
Willingness to update skills and knowledge and attend in-service training facilitated by the Fa or the local County Fa		
Has signed up to and agree to abide by the Code of Conduct for volunteer Welfare officers		
Desirable	evidenced	no evidence
knowledge of child protection issues knowledge of safeguarding children legislation		
relevant football knowledge/understanding		

## Footnotes

<sup>1</sup> This can be gained through The FA's Safeguarding Children Education Programme; see [www.TheFA.com/football-rules-governance/safeguarding](http://www.TheFA.com/football-rules-governance/safeguarding) for further information or speak to your County FA Welfare Officer.

<sup>2</sup> Some people with a history of offending can still be considered for this role. If you wish to find out more about this visit the CRC FAQ via this link – [www.TheFA.com/football-](http://www.TheFA.com/football-)

[rules-governance/safeguarding/criminal-records-checks](#) or email [FAChecks@TheFA.com](mailto:FAChecks@TheFA.com) or call 0845 210 8080.

The policy on CRC Enhanced Disclosures may be subject to change.

**nb** If anyone is known to be unsuitable to work with young people please contact your County FA Welfare Officer. Legally it is our collective duty to 'not knowingly employ' a barred person in regulated activity in future this duty will require us to ensure that persons in regulated activity are not barred.

### more information

More information about the role of the Welfare Officer is available via – [www.TheFA.com/ football-rules-governance/safeguarding/thinking-of-becoming-a-welfare-officer](http://www.TheFA.com/football-rules-governance/safeguarding/thinking-of-becoming-a-welfare-officer) if you need any further advice or information please contact your County FA Welfare Officer who will be happy to help you.

The Football Association reserves the right to refuse to accept any individual as a Welfare Officer where there is relevant information held by either the football authorities or the statutory agencies to suggest that they do not meet the suitability criteria provided.

## appendix 5

### Welfare officers code of conduct

The role of the Welfare Officers is to:

1. Be clear about the club's responsibilities when running activities for children and young people
2. Help those actively involved with children and young people understand what their duty of care means on a day to day basis

As a Welfare Officer you agree to act as a role model to others in accordance with the roles and responsibilities of your position, in line with FA Rules and Regulations, The FA Respect codes of conduct for officials and the laws of the game.

In taking up the position of Welfare Officer you are agreeing with this code of conduct and will accept that within the role of Welfare Officer you will:

- Be child-centred at all times and promote a fun safe environment for children and young people
- Follow all of The FAs policies and in particular procedures for reporting safeguarding concerns including discrimination
- Act appropriately with all situations brought to your attention
- Champion best practice within your club/league
- Communicate and positively engage with the CFA WO on all poor practice/ safeguarding matters brought to the attention of CFA /The FA
- Attend meetings as reasonably required by the club committee, youth league and CFA
- Manage and deal with poor practice issues in an appropriate and timely manner
- Ensure appropriate levels of confidentiality and data security are maintained at all times



- Implement and manage a responsible recruitment process in line with The FAs policy and procedures
- Attend continued personal development (CPD) opportunities as offered by my CFA or The FA and show a commitment to keeping my training up to date

By agreeing to hold the post of Welfare Officer, you understand that if you do not follow the above code any/all of the following actions may be undertaken by your Club, League County FA or The FA (this is not an exhaustive list):

- Required to meet with the club/league committee, YLWO or CFA WO
- Required to follow an action plan monitored by the YLWO/CFA WO
- Required to complete an FA education course
- Suspended by the club/league
- Fined or suspended by the County FA
- Required to leave the club/league
- Removed from role by the club/league County FA/The FA

On appointment you agree to uphold the Code of Conduct for Welfare Officers and understand the actions that may be taken should you fail to act in accordance with the Code. You also confirm that you meet the criteria outlined within The FA's Suitability Checklist for YLWO/CWOs.

*It seems extremely strange that the reporting procedures for bad practice and abuse closely involved the CWO, and yet no mention of them is made in the CWO code of practice, neither here nor in the separate leaflet provided by the FA.*

## appendix 6

### Signs and indicators of abuse

*It's a pity 'Signs and Indicators of abuse' have been tucked away in an appendix when the document started with more than 20 pages of procedure-free text which was a lot less relevant to the subject than this appendix.*

What is abuse?

Where and how does it happen? Does it really happen in sport and indeed, in football? 'Child abuse' is a term used to describe what happens when a person, or group of people, harm a child or young person under the age of 18. Child abuse may mean that harm is actively done to the child or young person, such as beating or burning, or it may refer to neglect where the carers fail to protect the child or young person from harm. The abuser is often an adult, but may also be another young person and occasionally even a child. Usually the abuser has some sort of power over the child or young person, and often knows them well. Abuse can happen anywhere, e.g. in the family, any institution or group and in any activity where children or young people are present. There is a risk that direct abuse, or neglect, can happen in football.

The FA defines abuse into five categories. These are:

- Neglect

- Physical abuse
- Sexual abuse
- Emotional abuse
- Bullying.

### Neglect

Neglect takes place if adults fail to meet a child or young person's basic physical needs, e.g. for food, warmth and clothing, or emotional needs such as attention and affection. It occurs if children or young people are left alone or inadequately supervised or where they are exposed to danger, injury or extreme weather conditions. In football, neglect could occur if children or young people do not have proper supervision, clothing or are allowed or encouraged to play whilst injured. It could occur if a child or young person's particular health needs are disregarded before, during, or after a game.

### Physical abuse

Physical abuse occurs if people physically hit, burn, poison, shake or in some way hurt or injure children and young people, or fail to prevent these injuries from happening. In football, physical abuse could happen where training methods are inappropriate for the developmental age of the child or young person, where they are allowed to play with an injury or where inappropriate drugs or alcohol are offered or accepted. It would clearly happen if a child or young person is hit or physically restrained or manhandled by those supervising the game or training session.

### Sexual abuse

Sexual abuse occurs if children or young people are used to meet another person's sexual needs.

This includes any form of sexual behaviour with a child or young person (by an adult or another child or young person), the use of sexually explicit language and jokes, inappropriate touching and exposure to pornographic material. It also includes 'sexting' an increasingly common activity among children and young people, where they share inappropriate or explicit images on-line or through mobile phones. 1 in 4 children have received unwanted images on the subject of sex according to the NSPCC 2014. Creating an indecent image of someone under 18 or sending such images is against the law. Sexual abuse can occur in football. For example, where there is inappropriate touching, or where sexually-explicit jokes occur between adults and children or young people or if indecent images are taken or adapted and placed on pornography sites.

**Emotional abuse** Emotional abuse includes frequent threatening, taunting or sarcastic behaviour, along with withholding affection or being extremely overprotective. It includes racist or sexist behaviour and demeaning initiation ceremonies. It can be inflicted by other children and young people as well as by adults. Children and young people who are being abused or bullied in any way will also experience emotional abuse. In football, coaches or parents emotionally abuse children and young people if they constantly criticise, abuse their power, or impose unrealistic pressure to perform to a high standard. It may also occur if a club allows members to deride people with disabilities or from minority cultures and use derogatory language about them.

### Bullying

Although anyone can be the target of bullying, children and young people who are perceived as “different” from the majority may be at greater risk of bullying. This includes children and young people from minority cultures or children and young people with disabilities.

Bullying can be defined as:

- Physical: hitting, kicking and theft
- Verbal: name calling, constant teasing, sarcasm, racist or homophobic taunts, threats and gestures
- Emotional: tormenting, mobile text messaging, ridiculing, humiliating and ignoring
- Sexual: unwanted physical contact or sexually abusive comments.

Bullying can take place anywhere, but is more likely to take place where there is inadequate supervision. In football it is more likely to take place in the changing rooms or on the way to and from the football pitch - but can also take place at a training session or in a competition. Football's competitive nature can create and even support an environment for the bully if individuals and clubs are unaware. The bully in football can be a parent who pushes too hard, a coach or manager who has a win-at-all costs philosophy; a child or young person intimidating another; or an official who places unfair pressure on a child or young person. In an NSPCC survey of young people (2000), bullying was reported to be the most common source of distress and anxiety.

### Signs and indicators

Children and young people may be reluctant to tell someone when they are being abused or may be bullied out of disclosing or forced to retract their concerns, so it is essential that every adult is aware of the possible signals that a child and young person's welfare or safety is being threatened. However, there is rarely a clear sign and you may often have to piece together various snippets of information and rely on your instinct that something does not seem quite right. You may have one piece of information that, when added to that of others, forms a clear picture of abuse. This is often compared to fitting pieces of a jigsaw together. Only when you have a few pieces can you start to see the true picture. Remember, it is not your job to decide whether or not a child or young person is being abused - however it is your responsibility to share your concerns. The table on the next page shows some possible physical and behavioural signs of abuse.

Some are very explicit and specific to the type of abuse, others are much more general. However, you need to be careful as any one of these signs might have another very plausible explanation, such as a death in the family, loss of a pet, an absent family member or problems at school.

However you should remember to raise your concerns if there is a combination of unexplained changes over a period of time. Never allow a child or young person's disability or cultural difference to explain away concerns. This is not a judgement for you to make.

### Possible signs and indicators of abuse

One, or more of the following might trigger concerns about a child:

- a sudden change in behaviour
- something a child says
- physical sign of abuse

NB The signs may vary according to the age and understanding of the child

Physical abuse	
Behavioural signs such as fear of contact, aggression, temper, running away, fear of going home, reluctance to change or uncover body, depression, withdrawal, bullying or abuse of others.	Physical signs such as unexplained and unusual bruising, finger and strap marks, cigarette burns, bite marks, fractures, scalds, missing teeth.
emotional abuse	
Behavioural signs such as unable to play, fear of mistakes, fear of telling parents, withdrawn, unexplained speech and language difficulty, few friends.	Physical signs such as weight change lack of growth or development, unexplained speech disorders, self-harm, clothing inappropriate for child's age, gender, culture.
bullying	
Behavioural signs such as difficulty making friends, anxiety over school, truancy, withdrawn, anger, moodiness, suicide attempts, reduced performance, money and possessions reported as lost, stealing from within the family, distress and anxiety on reading texts and emails.	Physical signs such as weight change, unexplained injuries and bruising, stomach and headaches, bed wetting, disturbed sleep, hair pulled out.
Sexual abuse	
Behavioural signs such as apparent fear of someone, nightmares, running away, sexually explicit knowledge or behaviour, masturbation, bedwetting, eating problems, substance abuse, unexplained money or gifts, acting out with toys, self-harm. With regards to sexting behavioural signs such as distress and anxiety on reading texts, being withdrawn, anger, moodiness and reduced performance.	Physical signs such as genital pain, itching, bleeding bruising, discharge, stomach pains, discomfort, pregnancy, incontinence, urinary infections or STDs, thrush and pain on passing motions.
neglect	
Behavioural signs such as always being tired, early or late, absent, few friends, regularly left alone, stealing, no money, parents or carer not attending or supportive.	Physical signs such as constant hunger, dirty, ill-fitting clothes or inappropriate clothing, weight change, untreated conditions and continual minor infections.



## appendix 7

# Affiliated Football Referral Form

Date of Referral: \_\_\_\_\_ County FA(s): \_\_\_\_\_



## Participant's details (This is the person you are referring to The FA)

Participant name		Relationship to victim/s	
Address		Tel Number	
		Email	
		Role in football <small>(Is the post paid?)</small>	
Postcode		Club or organisation	
Date of Birth		FAN	
Gender		Ethnicity	

## Referrer's details (Please enter your details)

Name of referrer		FAN number <small>(if relevant)</small>	
Address		Role / Organisation	
		Tel Number	
		Email	
Postcode		Relationship to participant	

## Child or Vulnerable Adult's details (The children or vulnerable adult/s who are at risk of harm)

<b>Details of alleged victim/s (age)</b> <i>e.g. Joe Bloggs (12 years), Wembley FC U13 girls team</i> <i>(Please include name, age, club, parent's details an any other relevant info)</i>		FAN <small>(if relevant)</small>	
		Gender	
		Ethnicity	
		Parent/carer name	
		Contact details <small>(telephone number, email, etc)</small>	
		County FA	

## Professional network (Please provide name, contact number and email. Kindly provide the advice received and contact date with agency)

LADO <small>(Name, telephone number and email address)</small>	
Children's Social Care	
Police	
Other <small>(e.g. NSPCC, Club Designated Safeguarding Officer, etc)</small>	

Details of concerns	
Type of abuse (Please tick as appropriate)	<input type="checkbox"/> Sexual abuse <input type="checkbox"/> Emotional abuse <input type="checkbox"/> Physical abuse <input type="checkbox"/> Neglect <input type="checkbox"/> Bullying <input type="checkbox"/> Other (Please specify):
<b>Incident/s details</b> Please summarise the incident, including details of any other relevant parties.  <u>Clearly identify a list of your safeguarding concern/s</u>	
Do you think this referral relates to:	<input type="checkbox"/> High level Poor practice <input type="checkbox"/> Possible or actual risk of harm to children <input type="checkbox"/> For information only <input type="checkbox"/> Not sure
<b>Action taken</b> Please specify if you referred to a statutory agency, the County FA, the Club Designated Safeguarding Officer or any other action taken related to your concerns (including action taken by the Club).	
<b>Other relevant information</b>	
<b>Further information</b> Please include any information that you think is relevant to our investigation  Can the FA contact the victim or their parent/s directly?	
<b>For FA use only</b> Date received by FA: _____ Case Accepted: Yes / No	



# appendix 8

## the Fa's safeguarding children education programme

### Safeguarding Children Workshop

The three-hour Safeguarding Children Workshop is mandatory for all Coaches taking FA Learning qualifications and trainee Referees over the age of 16. It explores in greater depth, what is meant by best and poor practice, and how to recognise concerns about the welfare of children and young people and what to do if you have concerns. The workshop is also aimed at helping individuals to examine the strong emotions this subject raises. In so doing it helps participants to manage their feelings in a positive way that won't interfere with their judgment about when and how to act.

**Introduction to Safeguarding** This online course is for trainee Referees aged 16 or under and is a mandatory part of this FA Learning qualification. Other young people in leadership positions who wish to take it may do so and this would be considered best practice but at this time is not mandatory. It focuses on safeguarding yourself, recognising harm and knowing how to report concerns.

**Recertification** The online safeguarding children recertification course provides an opportunity for all those who have completed the three-hour safeguarding children workshop to refresh, update and extend their knowledge. For more information about this online course go to your Local County FA website and follow the links to Member Services

**Welfare Officer Workshop** The Welfare Officer Workshop is targeted at those people in local club or league Welfare Officer roles. It builds on the best practice workshop, providing essential knowledge and skills, helping to develop the confidence required to deal with child protection issues at local level e.g. bullying and poor practice. It also enhances relationships with the County FA WOs and statutory agencies, where additional support can be gained and or serious concerns can be referred on to.

# appendix 9

## Facility development

The FA has been investing in the development of facilities for the past 12 years and as such has significant experience in this area. It is strongly recommended that any plans for new facilities, or the redesign of current facilities is referred to one of the Facilities and Investment Team at The FA. They will be happy to help in ensuring appropriate compliance and that suitable criteria is established early in the scheme.

The design and guidance offered will cover how children and young people can use and access the facilities, as well as providing a focus on the foot flow of the building to ensure adults and children do not access areas which could lead to allegations or incidents.

To help safeguard children and young people, designs of changing areas, including toilets and showers, together with vanity screens to the changing rooms themselves, require careful planning. Other issues can include access to changing areas, the location of spectator toilets, lighting, recessed

areas, electrical and boiler systems and proximity to car parking on site. The location of pitches to the changing rooms should also be considered carefully.

Details of The FA's Facilities and

Investment Team and the regions they cover can be found via – [www.TheFA.com/news/my-football/facilities/2012/dec/fa-facilities-team](http://www.TheFA.com/news/my-football/facilities/2012/dec/fa-facilities-team)

## appendix 10

### Goalpost safety

Several fatalities and serious injuries have occurred in recent years as a result of unsafe or incorrect use of goalposts. The most recent fatality was in 2011 in Wales with the football club and their representatives being found guilty of breaches of health and safety. The goal used was freestanding and did not meet British Standards. Safety is always of paramount importance and everyone in football must play their part to prevent similar incidents occurring in the future. The FA's Goalpost Safety campaign was originally launched in August 2000 and will be refreshed in Autumn 2015 to make sure of the awareness and importance of checking goalposts to prevent accidents: Check it, Secure it, Test it, Respect it, stresses the need for everyone involved in playing and organising football to play their part to make sure that these tragic accidents never happen again.