



**Premier League  
Charitable Fund**

**Safeguarding Standards for Premier League  
Club Community Organisations**

# Standard 1 - Leadership, governance and culture

Safeguarding is embedded in organisational leadership, governance and culture.

## Achievement indicators

Note: Achievement indicators are not exhaustive

- 1.1 There is demonstrable top-level commitment to safeguarding that creates and reinforces attitudes and behaviours that value children and adults at risk, creates a culture of accountability and drives continuous improvement.
- There is a designated Trustee/Trustee-level member of staff who takes leadership responsibility for the CCO's safeguarding arrangements and they actively champion safeguarding.
  - The CCO's Board (or equivalent) contributes to raising safeguarding awareness and communicating policies and procedures.
  - The CCO's Board (or equivalent) creates a culture of vigilance and action.
  - Safeguarding is represented through the CCO's vision, values and strategy.
  - Governance arrangements facilitate the implementation of safeguarding policies and practices at all levels.
  - Adequate resources are devoted to developing, implementing and reviewing safeguarding practices. The adequacy of resourcing is regularly reviewed.
  - The CCO ensures that staff with specific strategic and/or operational responsibility for safeguarding have protected time and support to fulfil their responsibilities.
  - Staff who hold specific strategic and/or operational responsibility for safeguarding have access to advice, support and regular reflective supervision.
  - Safeguarding features in the risk register and crisis management plan.
  - Safeguarding is a regular CCO Board (or equivalent) and departmental meeting agenda item.
  - The CCO's Board (or equivalent) regularly reviews safeguarding data, incident and allegation reports and lessons learnt.
  - Safeguarding policies and procedures and proposed improvements are endorsed at Board (or equivalent) level.
  - There are effective lines of communication between the CCO's Board (or equivalent) and staff who hold specific operational responsibility for safeguarding.
  - The CCO takes appropriate action when safeguarding and related policies and procedures have been breached.
- 1.2 There is a safeguarding strategy and an implementation plan. The plan includes objectives that support and work towards achieving the safeguarding strategy. The plan is appropriately resourced, for example: staff, time, work programmes and budget.
- There is a meaningful long-term strategy to guide ongoing activities and priorities to strengthen the CCO's safeguarding arrangements.
  - There is an implementation plan that details what is necessary to accomplish the strategy, for example: objectives, prioritised and measurable actions and outcomes, details of who is responsible for these actions and target dates.
  - The implementation plan includes planned actions resulting from independent audits.
  - The strategic plan is informed by assessment of the needs of and risks to children and adults at risk, and risks to the CCO.
  - The strategy and implementation plan are agreed at CCO Board level (or equivalent) and adequately resourced.
  - The CCO Board (or equivalent) receives regular strategy and implementation plan progress reports.

## Standard 2 - Roles and responsibilities

Everyone takes responsibility for safeguarding.

### Achievement indicators

Note: Achievement indicators are not exhaustive

2.1 There are clear lines of accountability for safeguarding.

### Required roles:

There are Trustees and staff with specific strategic and operational responsibilities for safeguarding and safer recruitment:

- There is a designated Trustee with senior leadership responsibility for the CCO's safeguarding arrangements, in consultation with the Designated Safeguarding Officer (DSO).
- There is a person trained in safeguarding as its DSO on the staff team.
- There is a Designated Safeguarding Officer responsible for raising safeguarding awareness within the CCO in collaboration with the Club Head of Safeguarding (or under the direction and supervision of the Club Head of Safeguarding where the CCO is governed by their parent Club's safeguarding governance framework).

2.2 Delegation of responsibilities is clear and there is a positive culture that embraces safeguarding.

- While the CCO Board (or equivalent) is ultimately responsible for ensuring that effective safeguarding policies and processes are in place, there is a clear expectation that safeguarding should be considered by everyone.
- Policies, procedures and education make clear that safeguarding is everyone's responsibility.
- Safeguarding roles and responsibilities are clearly defined and regularly reviewed.
- CCO staff have in place role descriptions which clearly define their safeguarding responsibilities.
- CCO staff who hold specific operational responsibility for safeguarding have role profiles which properly record their responsibilities.
- The role and contact details of staff with specific operational responsibility for safeguarding are promoted in relevant policies and resources, for example: safeguarding policies, staff handbook, activity literature and the CCO website.
- Regular, documented staff performance reviews take place. Safeguarding support and education needs are identified and provided.
- Everyone champions attitudes, behaviours and practices that respect the rights of all children and adults at risk and promotes their safety and welfare.

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<sup>1</sup> The role and responsibilities of the CCO Designated Safeguarding Officer are set out in the Premier League Charitable Fund's Capability Code of Practice at 6.2.4.

## Standard 3 – Prevention: policies, procedures and practice

There are effective safeguarding and related policies, procedures and practices in place. These are consistently implemented, regularly reviewed and where necessary, improved.

### Achievement indicators

Note: Achievement indicators are not exhaustive

- 3.1 There are effective safeguarding policies and procedures in place. These includes online safety and remote training, teaching and engagement.
- Safeguarding policies and procedures are consistent with legislation, statutory guidance, Keeping Children Safe in Education, football authority rules, requirements, guidance and good practice.
  - Safeguarding policies and procedures have been reviewed by the relevant local authorities (where they are prepared to do so).
  - Physical and online environments promote safety and wellbeing while minimising the opportunity for children and adults at risk to be harmed or exposed to inappropriate or explicit behaviour, materials or online content.
  - There are IT acceptable use and remote teaching/engagement policies.
  - There are web filtering procedures that apply to everyone utilising CCO electronic and IT systems.
  - The CCO regularly checks web filter reports and responds appropriately to any concerns raised within them.
  - Safeguarding has remained a priority during COVID-19 measures. There is demonstrable evidence of compliance with safeguarding requirements and guidance published by the Premier League Charitable Fund in response to COVID-19.
- 3.2 Safeguarding is a primary consideration during the planning, delivery and review of activities for or to be attended by children and/or adults at risk.
- Staff with specific strategic and/or operational responsibility for safeguarding have a regular presence across CCO activities and are actively involved in the planning, delivery and review of activities.
  - The Designated Safeguarding Officer reviews and approves the safeguarding arrangements for all activities for or to be attended by children and/or adults at risk.
  - Safeguarding is a key theme in activity planning processes and debriefs.
  - Safeguarding policies and/or practice reviews are informed by learning.
- 3.3 The identification and mitigation of safeguarding risk is incorporated into effective risk assessment processes at all levels i.e. from identification of organisational risks through to planning an activity.
- There is a process to regularly assess organisational and departmental safeguarding risks and to ensure appropriate mitigation measures are in place.
  - Safeguarding features in the CCO's risk register.
  - There is a risk management policy and guidance.
  - Policies and procedures are in accordance with rules and guidance published by the football authorities.
  - Health, safety, and safeguarding risks are identified and mitigated when planning and delivering activities. These are recorded within the Safe Event Management application or an appropriate form or substantially the same form.
  - Relevant information is shared with those who require it to support safe activity planning and/or delivery.
  - All risk assessments and risk management plans consider risks to children and adults at risk, and risks to the CCO.

3.4 There are effective safer recruitment procedures in place to prevent unsuitable individuals from working with, having access to, or influence over children and adults at risk.

- CCO recruitment and selection policies include safer recruitment procedures.
- CCO recruitment and selection policies and procedures are consistent with legislation, statutory guidance, football authority rules, requirements and guidance.
- The CCO maintains an accurate staff register in a single central record within the Safer Recruitment Records application or an appropriate form or substantially the same form.
- The CCO's safer recruitment procedures include:
  - ✓ Ensuring recruiters and interviewers are appropriately trained and supported
  - ✓ Having in place a thorough application process
  - ✓ Openly promoting the CCO's commitment to safeguarding when advertising roles that involve working with children and adults at risk
  - ✓ Scrutinising information provided in applications and CVs
  - ✓ Conducting value and competency-based interviews
  - ✓ Obtaining at least two written references
  - ✓ Qualification verification
  - ✓ Identity verification
  - ✓ Where appropriate, right to work in the UK checks
  - ✓ Where there is eligibility, criminal record checks and adherence to the rechecking period outlined in CCO policies and procedures
  - ✓ Effective measures to assess and manage risk in relevant circumstances
  - ✓ Role descriptions which properly record responsibilities
  - ✓ Employment contracts, casual worker and volunteer agreements
  - ✓ Supervision arrangements
  - ✓ Flexible probation periods
  - ✓ Regular performance appraisals
- Recruiting managers demonstrate confidence and awareness of the CCO's safer recruitment policies, procedures and expectations.
- Safer recruitment policies and procedures are consistently implemented.

3.5 The CCO's recruitment and selection procedures include methods for exploring candidates': (a) motivation and reasons for working with children and adults at risk, (b) perceptions about boundaries and acceptable behaviour, and (c) understanding of and commitment to safeguarding.

- Safeguarding is embedded within the interview process.
- Value based interviewing takes place.
- Candidates are asked safeguarding related questions at interview which demonstrates the candidate's knowledge and previous experience in relation to safeguarding

- 3.6 There are robust mental health policies, procedures and training in place.
- There are clear thresholds and processes in place for sharing information with/escalating concerns to the CCO Designated Safeguarding Officer.
  - CCO safeguarding policies, procedures, guidance and training have been updated to reflect changes to the definition of safeguarding children which been amended to include an emphasis on mental health. Staff training and guidance includes:
    - ✓ Awareness to support identification of mental health issues.
    - ✓ How to respond to identified or suspected mental health issues.
    - ✓ The scope and limitations of their role.
    - ✓ Mental health problems being a possible indication of safeguarding concerns, for example: abuse, neglect or exploitation.
    - ✓ How adverse experiences, like abuse and neglect, can have a lasting impact on a mental health, behaviour and education.
- 3.7 There is understanding of, commitment to and compliance with the Prevent Duty.
- The requirements of the Prevent Duty sit within the CCO's safeguarding governance framework. This is underpinned by effective partnership work and coordinated multidisciplinary operational delivery.
  - There is a Prevent risk register. Identified risks and mitigation/control measures are proactively monitored and regularly reviewed.
  - There is either a standalone policy or Prevent Duty requirements, procedures and expectations are embedded in relevant existing policies and procedures, for example: safeguarding, external speakers, online/e-safety and acceptable IT use.
  - There are clear thresholds and processes in place for sharing information with/escalating concerns to the CCO Designated Safeguarding Officer.
  - Staff receive Prevent Duty training without an overreliance on online training.
  - Children and adults at risk are empowered to keep themselves safe. The CCO reinforces and contextualises school messages delivered to children.
  - Children and adults at risk are safeguarded from terrorist and extremist material when accessing the CCO IT facilities and equipment, for example but not limited to: network and email filtering, monitoring, encryption and anti-virus protection.
  - The CCO regularly checks web filter reports and responds appropriately to any concerns raised within these.
- 3.8 Additional vulnerability is carefully considered, and appropriate measures and support provided, for example: those with disabilities, from BAME backgrounds, those who identify as LGBT, children playing or working in an adult environment, those in care, care leavers and looked after children.
- Policies, guidance and training address additional vulnerability to support staff understanding and equip them with the necessary knowledge and skills to meet the needs of children and adults at risk.
  - The CCO is aware of numbers of vulnerable individuals it engages with. There is demonstrable evidence that they are adequately safeguarded and that their needs are being met.
  - The CCO seeks relevant information about additional needs and demonstrates that these are met.
  - Skilled and experienced staff are deployed to meet the needs of children and adults at risk.
  - Additional staff are resourced where required, over and above standard staff to child and/or adult at risk ratios.

- 3.9 The CCO articulates its values and expectations of behaviour in codes of ethics and conduct.
- CCO values and expected standards of behaviour are in place for all staff, children, adults at risk, their parents/carers and activity spectators. This includes online interactions.
  - Consequences and procedures for dealing with breaches are made clear.
  - Expected standards of staff behaviour include information about positions and relationships of trust.
  - There are measures to assess awareness and understanding. Work is undertaken to provide clarity and further guidance where necessary.
  - There is an environment where individuals feel comfortable and confident in challenging and/or reporting breaches.
  - There are clear procedures and support available for individuals reporting a breach and those finding themselves the subject of a complaint/allegation.
  - Breaches are taken seriously and acted on in line with relevant procedures, for example, staff disciplinary procedures and managing allegations against staff.
- 3.10 Safeguarding and related procedures are implemented and there are measures to evaluate implementation and understanding. Where appropriate, implementation priorities are identified and resourced.
- Everyone demonstrates awareness of and confidence in the CCO's safeguarding policies, procedures and expectations.
  - There is demonstrable evidence that safeguarding and related policies and procedures are consistently implemented across CCO activities.
  - There are quality assurance processes to assess understanding, implementation and consistency in delivery.
- 3.11 The CCO regularly assesses whether procedures are effective in practice or if further development or improvement is required.
- Safeguarding and related policies and procedures are reviewed annually or whenever there is a significant change in the CCO, legislation, statutory or football authority guidance, or after any significant safeguarding incident to minimise the risk of recurrence.
  - Review periods and policy versions are included in policies and procedures and a record of changes/additions is kept.
  - Feedback is sought from all levels of the CCO as part of the review process to assess the extent to which procedures are embedded, identify any gaps in procedures and to ensure they are cohesive, for example: activity debriefs, focus groups, online surveys and training evaluation processes.

## Standard 4 – Educating and empowering

Children and adults at risk are informed about their rights and everyone is equipped with safeguarding knowledge and skills.

### Achievement indicators

Note: Achievement indicators are not exhaustive

- 4.1 Everyone is made aware of their safeguarding responsibilities and the CCO's expectations of them when commencing their role.
- There is an induction process for all new members of staff which includes familiarisation with CCO's safeguarding policies, procedures and expected standards of behaviour.
  - Staff complete the Premier League's safeguarding e-learning module before commencing their role or as part of the induction process. This is followed up with delivery of face-to-face safeguarding training either before or very soon after commencing their role.
  - Staff are provided with: clear descriptions of what constitutes poor safeguarding practice, abuse or unsuitable behaviour towards children and adults at risk, details of what they are required to do if there is any sign of poor safeguarding practice, abuse, or unsuitable behaviour towards a child or adult at risk or if there is a suspicion that such conduct is taking place, and the Premier League's Guidance for Safer Working Practice.
- 4.2 There is a clear commitment to developing a workforce who are competent and empowered to create safe environments, recognise safeguarding concerns and risks, and take appropriate action when an issue arises.
- Measures for raising awareness are integrated into a workforce development plan and personal development plans. These plans ensure that everyone involved with the CCO (not only those with direct contact with, responsibility for, or influence over children and adults at risk) receives regular safeguarding and related education commensurate with their responsibilities at regular intervals.
  - Budget and resource requirements are identified and made available to deliver the workforce development plan.
  - The safeguarding workforce development plan exceeds basic awareness training and includes education over and above The FA's Safeguarding Children Workshop.
  - Staff with specific strategic and/or operational responsibility for safeguarding undertake regular continuing professional development training in the safeguarding of children and adults at risk and maintain a record thereof.
  - The CCO communicates changes to safeguarding and related policies and procedures to relevant stakeholders, for example: through education, staff briefings, email correspondence and team meetings.
  - Accurate safeguarding and related education attendance records are maintained.
  - Staff demonstrate high levels of awareness and understanding of their own responsibilities and the CCO's policies, procedural and practice requirements.
  - Staff have sound knowledge of the rights of children and adults at risk, including their rights to feel safe and be heard.
  - There are evaluation measures in place. Outcomes are used to influence the review of the safeguarding workforce development plan.
  - The safeguarding workforce development plan is regularly reviewed and updated in line with changes to legislation, statutory guidance, learning outcomes from safeguarding incidents, guidance from statutory and football authorities, as well as feedback received from stakeholders.

- 4.3 Children and adults at risk are informed about their rights to protection from abuse, exploitation and mistreatment in any form and are empowered to report concerns.
- The CCO empowers and educates children and adults at risk about their rights, safety and welfare in physical and online environments, for example: education, activity resources, handbooks, induction processes, parent’s evenings and activity briefing sessions. Budget and resource requirements are identified and made available.
  - Internal and external routes for raising concerns, making complaints, seeking support and advice are widely promoted to children, adults at risk and their parents/carers.
  - Children and adults at risk demonstrate an awareness of their rights to be safe and heard.
  - Staff, children, adults at risk and their parents/carers demonstrate a sound awareness of and confidence in the CCO’s safeguarding procedures.
- 4.4 There are clear, effective and widely promoted complaints and whistleblowing procedures.
- There are clear, effective and widely promoted procedures for raising complaints and whistleblowing.
  - External routes and contacts are promoted alongside formal internal procedures.
  - All concerns and reports are taken seriously and acted upon appropriately.
  - Staff demonstrate a sound awareness of and confidence in the CCO’s grievance and whistleblowing procedures.
  - Children, adults at risk and their parents/carers demonstrate a sound awareness of and confidence in the CCO’s procedures for raising concerns and complaints.
- 4.5 Safeguarding policies and procedures, and ways to report concerns are widely promoted.
- Safeguarding and related policies and procedures are widely promoted and easily accessible, for example: intranet, shared drive, induction materials, handbooks, activity literature, pocket/quick reference guide and education resources.
  - The role and contact details of staff who hold specific strategic and/or operational responsibility for safeguarding is made known to staff, partners, children, adults at risk and their parents/carers in any handbook or the like produced to accompany any activity.
  - There is an easily accessible section on the CCO’s website which includes: a clear statement of the CCO’s commitment to safeguarding, the name and contact details of staff who hold specific operational responsibility for safeguarding, and a copy of its safeguarding policies and procedures.

## Standard 5 – Protection

Concerns and complaints are taken seriously and responded to swiftly and appropriately.

### Achievement indicators

Note: Achievement indicators are not exhaustive

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| <p>5.1 There are clear and effective policies and procedures for managing safeguarding concerns and allegations against staff.</p>  | <ul style="list-style-type: none"><li>• There are written policies and procedures for managing safeguarding concerns and allegations against staff.</li><li>• Policies and procedures for managing safeguarding concerns and allegations against staff are consistently implemented and regularly reviewed.</li><li>• Processes and decisions are child/adult at risk-centred and outcome-focused.</li><li>• There is an impartial investigation process for dealing with safeguarding concerns.</li><li>• Records demonstrate that all concerns are taken seriously and dealt with appropriately.</li><li>• Support is available for individuals reporting concerns, those affected by safeguarding concerns, and where appropriate, those finding themselves the subject of an allegation.</li></ul> |
| <p>5.2 Responsibility for managing concerns and complaints is clearly assigned and stakeholders are kept apprised of processes and outcomes.</p>  | <ul style="list-style-type: none"><li>• Those involved with the investigation and case management processes have the necessary the skills, knowledge and experience.</li><li>• External and/or independent expertise is sought where necessary.</li><li>• The Designated Safeguarding Officer is the lead CCO official to manage safeguarding concerns, investigations and external referrals.</li><li>• The Board level member of staff who takes leadership responsibility for the CCO's safeguarding arrangements receives timely reports on safeguarding concerns and is kept fully apprised.</li><li>• The CCO Board receives regular anonymised information about safeguarding incidents and allegations.</li><li>• Relevant stakeholders are kept apprised of progress and outcomes.</li></ul>  |
| <p>5.3 There is an effective electronic case management system for recording and tracking concerns and allegations pertaining to the safety and welfare of children and adults at risk.</p> | <ul style="list-style-type: none"><li>• There is an electronic case management system.</li><li>• Clear and comprehensive records are kept of all concerns and complaints, details of how these were handled, details of any action taken, decisions reached and how these were reached, as well as any learning outcomes.</li><li>• Records are handled and stored securely in line with relevant legislation.</li></ul>   |

## Standard 6 – Working together

There is a clear commitment to working together to promote and protect the safety and welfare children and adults at risk.

### Achievement indicators

Note: Achievement indicators are not exhaustive

- 6.1 Working together underpins the work undertaken to promote and protect the safety and welfare of children and adults at risk.
  - There is a multidisciplinary approach to promoting and protecting the safety, welfare and wellbeing of children and adults at risk.
  - Staff with specific strategic and/or operational responsibility for safeguarding, player care, welfare, mental and emotional wellbeing work together to ensure there is a collaborative and cohesive approach to proactive prevention and awareness raising measures, and where appropriate, interventions and responding to issues.
  - The CCO and CCO work together to ensure there is a collaborative and cohesive approach to proactive prevention and awareness raising measures, and where appropriate, interventions and responding to issues.
  - There is evidence of effective information and working together to safeguard children and adults at risk, for example, with statutory and football authorities, the Disclosure and Barring Service and the Charity Commission.
  - Good practice is shared internally and with peer organisations.
  
- 6.2 Safeguarding is actively promoted and embedded within all partnerships and commissioned services.
  - Safeguarding is a key consideration during activity planning, delivery and reviews.
  - Safeguarding policies and expectations are communicated to partners, third parties and suppliers.
  - The CCO assesses partner, third party, consultant and supplier suitability, and the adequacy of their safeguarding and safer recruitment policies and practices.
  - There is evidence of effective information and working together to assess and mitigate risk, and to protect the safety and welfare of children and adults at risk.
  - Contractual agreements clearly outline respective safeguarding responsibilities.
  - There is a contractual agreement in place between the CCO and CCO which clearly outlines safeguarding accountability and responsibilities.
  - Partners, third parties and suppliers are trained in the CCO's safeguarding policies and practices.
  - There are quality assurance measures in place to assess safeguarding practice and consistency in delivery.

## Standard 7 – Listening culture

There is a culture that promotes listening and respecting views and wishes.

### Achievement indicators

Note: Achievement indicators are not exhaustive

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| <p>7.1 The CCO proactively seeks feedback from stakeholders on a regular basis to strengthen its safeguarding arrangements.</p>   | <ul style="list-style-type: none"><li>• The CCO facilitates proactive ways for staff and relevant stakeholders to express their views, participate in decision making and raise concerns.</li><li>• There is demonstrable evidence of how feedback is used to develop and/or enhance CCO policies and practices.</li><li>• There is a supportive internal response to the raising of concerns, complaints and whistleblowing.</li><li>• Consultation measures are regularly evaluated and reviewed</li></ul>   |
| <p>7.2 There is a culture of listening to children and adults at risk and taking account of their wishes and feelings, both in individual decisions and the development and review of policies and practices.</p> | <ul style="list-style-type: none"><li>• The CCO facilitates proactive ways for children and adults at risk to express their views, participate in decision-making and raise concerns.</li><li>• There are established online and offline measures used to consult children and adults at risk.</li><li>• Children and adults at risk are provided with leadership opportunities.</li><li>• Consultation measures are regularly evaluated and reviewed.</li><li>• Children and adults at risk are comfortable participating in decision-making and communicating their views and concerns.</li><li>• There is demonstrable evidence of how feedback is used to develop and/or enhance safeguarding policies, practices as well as child and adult at risk experience.</li></ul> |

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