



Safeguarding Standards

2022/23

Introduction

Our Safeguarding Commitment

Safeguarding Governance in Football

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Introduction

The Premier League places great importance on safeguarding and believes that everyone has the right to enjoy football and participate in our activities in safe and inclusive environments.

These Safeguarding Standards have been produced as a central part of our commitment to safeguarding. They provide a framework through which the Premier League works in partnership with Clubs to ensure that the highest levels of safeguarding practice are achieved, maintained and regularly reviewed to drive continuous improvement.

These Safeguarding Standards should be read in conjunction with Premier League Rules.

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Our Safeguarding Commitment

We deliver our commitment to safeguarding by:

- Taking all reasonable steps to make it as difficult as possible for any form of abuse, exploitation or mistreatment of children and adults at risk to take place in both physical and online environments
- Embedding a holistic approach to safeguarding and promoting the welfare and wellbeing of children and adults at risk
- Ensuring that safeguarding is firmly embedded in the values and practices of the Premier League and those of each Club
- Building a shared understanding of the importance of safeguarding and everyone's personal responsibility for safeguarding
- Raising awareness and empowering everyone we engage with to create safe environments, to identify and respond appropriately to safeguarding concerns
- Empowering children and adults at risk to understand their rights and where they can get help or advice if they need it
- Embedding safeguarding in the planning, delivery and review of all our activities
- Working with and supporting Clubs to meet our safeguarding requirements
- Collaborative partnership working with Clubs and their affiliated Community Organisations, The FA, the Premier League Charitable Fund, statutory agencies and other key partners

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Football's approach to safeguarding is underpinned by legislation, statutory guidance and current best practice.

The FA

The FA sets the safeguarding policy and regulatory framework across football in England. The regulatory framework enables the FA to take action against any affiliated person or organisation that breaches its safeguarding policy and regulations.

The Premier League

The Premier League has a dual role in supporting Clubs with the implementation of their safeguarding arrangements, and in monitoring and evaluating the adequacy of each Club's safeguarding arrangements through an independent audit process to ensure that compliance with our Safeguarding Rules and Standards are achieved and maintained.

Additionally, the Premier League has its own safeguarding policy and procedures which underpin all its activities.

Clubs

Clubs are required to implement their own safeguarding policies and procedures that must be consistent with football authority regulations, legislation, statutory guidance and current best practice. Clubs' compliance with the Premier League's Rules and the Safeguarding Standards is subject to regular independent scrutiny.

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Working Together

We are committed to working closely with Clubs to ensure that high standards of safeguarding practice are in place across all areas of our work.

The Premier League has a dedicated Safeguarding Team with primary responsibility for working with Clubs to guide and support their safeguarding arrangements. This work includes engaging with each Club to agree a bespoke safeguarding support plan. These support plans will focus on priority areas for development or improvement which have been identified through the ongoing independent audit process. In addition, each support plan will take account of:

- Current local and national safeguarding issues;
- Premier League safeguarding priorities and areas of focus;
- Clubs safeguarding strategies and areas of focus; and
- Wider trends identified through the independent audit process.

Our Safeguarding Team is available to support Clubs in working through their bespoke safeguarding support plans and to provide training, resources, advice and guidance as required.

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Standard 1 - Leadership, governance and culture

Safeguarding is embedded in organisational leadership, governance and culture.

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.

Achievement indicators

- There is a Board-level member of staff who takes leadership responsibility for the Club's safeguarding arrangements and they actively champion safeguarding ("Senior Safeguarding Lead"). Additional measures are in place if this post holder lacks adequate safeguarding expertise, for example, but not limited to: they are included in safeguarding supervision measures, appointment of a non-executive safeguarding champion/advisor and/or establishment of a Strategic Safeguarding Board including local partner representation feeding into the main Club's Board.
- Club Board directors/members undertake safeguarding training delivered by the Premier League (or appropriate equivalent training approved by the Head of Safeguarding in accordance with Premier League Rule S.8.) within two months of their appointment to the Board. Continuous professional development is undertaken annually.
- The Club's Board contributes to raising safeguarding awareness and communicating policies and procedures.
- The Club's Board drives a culture of vigilance and action.
- Safeguarding is represented through the Club'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.
- Adequate resources are devoted to developing, implementing and reviewing safeguarding practices. The adequacy of resourcing is regularly reviewed.
- The Club ensures that staff with specific strategic and/or operational responsibility for safeguarding have protected time and support to fulfill their responsibilities.
- There are safeguarding supervision, performance management and appraisal policies and procedures in place.
- Safeguarding features in the Club's risk register and crisis management plan.
- Safeguarding is a regular Club Board and departmental meeting agenda item.
- The Club's Board regularly reviews safeguarding data, incident and allegation reports and lessons learnt.
- Safeguarding policies and procedures and proposed improvements are endorsed at Board-level.
- There are effective lines of communication between the Club's Board and Safeguarding Team.
- The Club takes appropriate action when safeguarding and related policies and procedures have been breached.

Note: Achievement indicators are not exhaustive

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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.

Achievement indicators

- There is a meaningful long-term strategy to guide ongoing activities and priorities to strengthen the Club'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 Club.
- The strategy and implementation plan are agreed at Club Board level and adequately resourced.
- The Club Board receives regular strategy and implementation plan progress reports.

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Standard 2 - Roles and responsibilities

Everyone takes responsibility for safeguarding.

2.1 There are clear lines of accountability for safeguarding.

Achievement indicators

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

- There is a ¹Board-level member of staff who takes leadership responsibility for the Club's safeguarding arrangements.
- Club requirement: There is a member of staff with the necessary skills and expertise appointed as the ²Head of Safeguarding. The Head of Safeguarding is dedicated full-time to that role as their sole responsibility.
- There is an ³Academy Safeguarding Officer responsible for raising safeguarding awareness within the Academy under the direction and supervision of the Club Head of Safeguarding.
- There is a ⁴member of staff responsible for ensuring compliance by the Club with its safer recruitment policies and procedures.
- Club Community Organisation requirement ("CCO"): There is a designated ⁵Safeguarding 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).

Note: The Club Head of Safeguarding may delegate safeguarding responsibilities to one or more other members of staff ("Safeguarding Officer(s)"). In such circumstances, the Head of Safeguarding must supervise the work of each Safeguarding Officer and ensure that they are properly trained and supported.

¹ The role and responsibilities of the Senior Safeguarding Lead are set out in Premier League Rule S.3.

² The role and responsibilities of the Head of Safeguarding are set out in Premier League Rule S.5.

³ The role and responsibilities of the Academy Safeguarding Officer are set out in the Premier League Youth Development Rules.

⁴ The role and responsibilities of the Lead Disclosure Officer are set out in Premier League Rule S.21.

⁵ The role and responsibilities of the CCO Safeguarding Officer are set out in the Premier League Charitable Fund's Capability Code of Practice.

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

Achievement indicators

- While the Club's Board 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.
- Club staff have in place role descriptions which clearly define their safeguarding responsibilities.
- Club 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, Academy player handbook and the Club 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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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.

3.1 There are effective safeguarding policies and procedures in place. These include online safety and remote training, teaching and engagement.

Achievement indicators

- Club Safeguarding policies and procedures are consistent with: legislation, statutory guidance, football authority rules, requirements, guidance and current good practice. Academy procedures meet Ofsted and Keeping Children Safe in Education requirements.
- 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.
- Safeguarding measures are embedded in eSports competitions/activities.
- There are IT acceptable use and remote teaching/engagement policies.
- There are web filtering procedures that apply to everyone utilising Club electronic and IT systems.
- The Club regularly checks web filter reports and responds appropriately to any concerns raised within them.

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.

Achievement indicators

- Staff with specific strategic and/or operational responsibility for safeguarding have a regular presence across Club activities and are actively involved in the planning, delivery and review of activities.
- The Head of Safeguarding (or a Safeguarding Officer under the direction and supervision of the Head of Safeguarding) 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.

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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.

Achievement indicators

- 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 Club'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 equivalent alternative system/recording measure).
- 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 Club.

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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.

Achievement indicators

- Club recruitment and selection policies include safer recruitment procedures.
- Club recruitment and selection policies and procedures are consistent with: legislation, statutory guidance, football authority rules, requirements and guidance.
- The Club 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 approved by the Premier League.
- The Club's safer recruitment procedures include:
 - Ensuring recruiters and interviewers are appropriately trained and supported
 - Having in place a thorough application process Openly promoting the Club'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 Club 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 Club's safer recruitment policies, procedures and expectations.
- Safer recruitment policies and procedures are consistently implemented.

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3.5 The Club’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.

Achievement indicators

- 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 governance arrangements, policies and procedures in place for care and accommodation providers and multi-occupancy Club boarding accommodation.

Achievement indicators

- There is a care and accommodation provider/ multi-occupancy Club boarding accommodation policy and procedure in place.
- The Club seeks assurance that safeguarding policies and procedures of partner schools delivering boarding accommodation are robust.
- Local Private Fostering Regulations are adhered to in the case of any child under the age of sixteen.
- Recruitment/procurement procedures encourage applications from diverse and representative applicants.
- Multi-occupancy Club boarding accommodation candidates are subject to safer recruitment procedures in Standards 3.4 and 3.5.
- There is a selection and approval panel which includes the Head of Safeguarding (or a Safeguarding Officer under their direction and supervision).
- The care and accommodation provider suitability assessment and approval process includes:
 - A thorough application process.
 - Care and accommodation applicants being required to complete a detailed application form requesting information about their family and family life.
 - Interviews that explore motivation, boundaries and commitment to safeguarding.
 - Criminal record checks. Reference requests.
 - Multidisciplinary risk assessments include safeguarding, health and safety, medical and player care staff.

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3.6 continued

- There are contractual agreements between the Club and care and accommodation providers.
- Matching processes and placement plans take account of the specific individual needs of children.
- Children, their parents and carers and care and accommodation providers are consulted about placements.
- Placement plans take account of specific individual needs to show how the child's specific needs will be met.
- Care and accommodation providers and multi-occupancy Club boarding accommodation staff are required to adhere to a code of conduct which includes safeguarding expectations.
- Care and accommodation providers and multi-occupancy Club boarding accommodation staff receive an induction which includes safeguarding.
- Care and accommodation providers/multi-occupancy Club boarding accommodation staff are included in the safeguarding workforce development plan.
- Care and accommodation providers are provided with safeguarding information including in and out of hours contacts.
- There are clear procedures and support available for care and accommodation providers and multi-occupancy Club boarding accommodation staff who may need to report a breach or may be the subject of a complaint/allegation.
- There is safeguarding involvement in reviewing all complaints against care and accommodation providers or decisions to terminate their services.
- Care and accommodation provider placements are monitored and reviewed through regular routine visits by identified Club staff. This process includes unannounced visits and there is a record of all planned and unannounced visits.
- There is evidence of effective communication and partnership working between care and accommodation providers, children placed in their care and their parents/carers.
- Children and their parents/carers are invited to give feedback on care and accommodation providers as part of a review process. Their views are considered when determining if a placement is to be sustained or changed.
- Identified care and accommodation provider/ multi-occupancy Club boarding accommodation risks and mitigation/control measures are proactively monitored and regularly reviewed.
- The Senior Safeguarding Lead and Head of Safeguarding have oversight of all safeguarding risks and mitigation/control measures associated with care and accommodation providers/ multi-occupancy Club boarding accommodation arrangements.
- Care and accommodation providers/multi-occupancy Club boarding accommodation arrangements feature in the Club's risk register.
- The safeguarding implementation plan takes account of actions identified to enhance or improve care and accommodation provider/ multi-occupancy Club boarding accommodation policies and procedures.

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3.7 There is understanding of, commitment to and compliance with the Prevent Duty.

Achievement indicators

- The requirements of the Prevent Duty sit within the Club'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 Club Head of Safeguarding and/or safeguarding team.
- Staff receive Prevent training without an over reliance on online training.
- Academy education staff receive training which incorporates exemplifying and promoting of British values to Academy players.
- Academy player are empowered to keep themselves safe through the promotion of age appropriate resources, delivery of education including but not limited to: online safety, building resilience by promoting fundamental British values and enabling them to challenge extremist views.
- Where the Club Academy is not the main education provider, it reinforces and contextualises school messages delivered to Academy players.
- Children and adults at risk are safeguarded from terrorist and extremist material when accessing the Club IT facilities and equipment, for example but not limited to: network and email filtering, monitoring, encryption and anti-virus protection.
- The Club regularly checks web filter reports and responds appropriately to any concerns raised within these.
- Premier League Rule S.2. places a requirement on Clubs comply with any guidance published by the Premier League from time to time. The Club therefore ensures that their policies, procedures and practice meet the requirements set out in our 'Safeguarding Against Radicalisation and Extremism - Prevent Duty Guidance.'

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3.8 Safeguarding is embedded in match day/stadium event safeguarding policies, procedures, practice and training

Achievement indicators:

- Match day and event safeguarding policies and procedures are consistent with relevant legislation and guidance (including Green and Purple Guides), football authority requirements and guidance.
- Match day and other stadium events have a Safeguarding Officer (working under the direction and supervision of the Head of Safeguarding) responsible for all safeguarding arrangements who works in effective partnership with those responsible for match day/stadium event command, control and coordination arrangements.
- Safeguarding is embedded in match day/stadium event planning, pre-briefs, debriefs, test and exercise assurance measures.
- Match day and stadium event stewards complete NVQ Level II safeguarding module (or appropriate equivalent training approved by the Head of Safeguarding in accordance with Premier League Rule S.8.)

3.9 There are robust mental health governance arrangements, policies, procedures and training in place.

Achievement indicators

- There is a Mental and Emotional Wellbeing Lead, with responsibility for the Club's mental emotional wellbeing provision and who actively champions mental and emotional wellbeing initiatives at Board level.
- There is a mental health strategy and action plan. Operational delivery of the strategy and action plan is underpinned by a multidisciplinary approach which includes the Head of Safeguarding.
- There are robust policies and procedures to ensure effective identification of concerns and needs, and to make appropriate professional judgements about any support and intervention measures.
- There are clear thresholds and processes in place for sharing information with/escalating concerns to the Club Head of Safeguarding and/or safeguarding team.
- Club safeguarding policies, procedures, guidance and training have been updated to reflect changes to the definition of safeguarding children which have 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 mental health, behaviour and education.

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3.10 Additional vulnerability is carefully considered, and appropriate measures and support provided, for example but not limited to: those with disabilities, from ethnically diverse communities, those who identify as LGBTQ+, those in elite sporting environments, children playing or working in an adult environment, those in care and accommodation arrangements, those in care, care leavers and looked after children.

Achievement indicators

- 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 Club 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 Club 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.
- Safeguarding forms part of a multidisciplinary approach to supporting Academy player transition, including sharing of information to support and protect children.

3.11 The Club articulates its values and expectations of behaviour in codes of ethics and conduct.

Achievement indicators

- Club 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.

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3.12 Safeguarding and related procedures are implemented and there are measures to evaluate implementation and understanding. Where appropriate, implementation priorities are identified and resourced.

Achievement indicators

- Everyone demonstrates awareness of and confidence in the Club's safeguarding policies, procedures and expectations.
- There is demonstrable evidence that safeguarding and related policies and procedures are consistently implemented across Club activities.
- There are quality assurance processes to assess understanding, implementation and consistency in delivery.

3.13 The Club regularly assesses whether procedures are effective in practice or if further development or improvement is required.

Achievement indicators

- Safeguarding and related policies and procedures are reviewed annually or whenever there is a significant change in the Club, 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 Club 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.

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

4.1 Everyone is made aware of their safeguarding responsibilities and the Club's expectations of them when commencing their role.

Achievement indicators

- There is an induction process for all new members of staff which includes familiarisation with Club's safeguarding policies, procedures and expected standards of behaviour.
- Staff complete the Premier League's safeguarding e-learning module (or an appropriate equivalent approved by the Head of Safeguarding in accordance with Premier League Rule S.8.) before commencing their role or as part of the induction process. This is succeeded by 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.

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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.

Achievement indicators

- Measures for raising awareness are integrated into a safeguarding workforce development plan overseen by the Head of Safeguarding as well as personal development plans. These plans ensure that everyone involved with the Club (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.
- The safeguarding workforce development plan exceeds basic awareness training and includes education over and above The FA's Safeguarding Children Course and the Premier League's e-learning module.
- The workforce development plan includes adult first team/professional players and the staff who work with them. These stakeholder groups receive safeguarding and healthy relationships training via the Premier League (or appropriate equivalent training approved by the Head of Safeguarding in accordance with Premier League Rule S.8.).
- Budget and resource requirements are identified and made available to deliver the workforce development plan.
- 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, approved by the Premier League and maintain a record thereof.
- The Club 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 Club'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.

Note: Achievement indicators are not exhaustive

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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.

Achievement indicators

- The Club 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.
- Parents/carers and Academy care and accommodation providers are included as key stakeholders in safeguarding awareness raising measures/communication plans.
- 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 Club’s safeguarding procedures.

4.4 There are clear, effective and widely promoted complaints and whistleblowing procedures.

Achievement indicators

- 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 Club’s grievance and whistleblowing procedures.
- Children, adults at risk and their parents/carers demonstrate a sound awareness of and confidence in the Club’s procedures for raising concerns and complaints.

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4.5 Safeguarding policies and procedures, and ways to report concerns are widely promoted.

Achievement indicators

- 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 Club's website which includes: a clear statement of the Club'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.

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

5.1 There are clear and effective policies and procedures for managing all levels of safeguarding concerns and allegations against staff.

Achievement indicators

- Policies and procedures for managing safeguarding concerns and allegations against staff are consistently implemented and regularly reviewed. These procedures include the management of low-level concerns.

A low-level concern is any concern that an adult has acted in a way that is inconsistent with the Club's code of conduct (including inappropriate conduct outside of the workplace) which might cause concern about that adult's suitability to work with children and/or adults at risk.

Low-level concerns don't meet the threshold of harm/for external referral to statutory agencies. Relevant partner agencies should be contacted for advice whenever it is unclear if referral criteria has been met or where the concern is of a serious nature.

Further guidance:

Keeping Children Safe In Education 2022:
<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2b>

NSPCC Responding to low-level concerns:
<https://learning.nspcc.org.uk/news/2021/october/responding-low-level-concerns-in-education>

- Processes and decisions are child/adult at risk-centered and outcome-focused.
- There is an impartial investigation process for dealing with safeguarding concerns.
- Records demonstrate that all concerns are taken seriously and dealt with appropriately.
- Support is available for individuals reporting concerns, those affected by safeguarding concerns, and where appropriate, those finding themselves the subject of an allegation.
- The Club notifies The FA and Premier League (through the submission of the Affiliated Football Safeguarding Referral Form) of, and gives The FA and Premier League information as they may require in respect of, any information received by the Club as outlined in Premier League Rule 14.

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5.2 Responsibility for managing concerns and complaints is clearly assigned and stakeholders are kept apprised of processes and outcomes.

Achievement indicators

- Those involved with the investigation and case management processes have the necessary the skills, knowledge and experience.
- External and/or independent expertise is sought where necessary.
- The Head of Safeguarding is the lead Club official to manage safeguarding concerns, investigations and external referrals.
- The Board-level member of staff who takes leadership responsibility for the Club's safeguarding arrangements receives timely reports on safeguarding concerns and is kept fully apprised.
- The Club's Board receives regular anonymised information about safeguarding incidents and allegations.
- Relevant stakeholders are kept apprised of processes and outcomes.

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.

Achievement indicators

- There is an electronic case management system which as a minimum:
 - Allows direct inputting/recording and reporting by the Club's workforce. ◦ Alerts relevant staff immediately as concerns arise/are reported.
 - Has functionality to assign and monitor actions.
 - Has functionality to capture data to support analysis of trends.
- There is a single system approach to the recording of all safeguarding, welfare or wellbeing issues or there are documented thresholds which provide clarity on when issues should be recorded on the Club's electronic case management system.
- Electronic case management system records:
 - Reflect sound professional judgements and defensible decision making. Detail the action being taken to safeguard children and adults at risk.
 - Demonstrate planning and review is carried out.
 - Demonstrate assessment and working together in complex cases.
 - Detail learning outcomes, policy and practice development or improvement measures implemented.
 - Are handled in line with relevant data protection legislation and regulations.

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

6.1 Working together underpins the work undertaken to promote and protect the safety and welfare of children and adults at risk.

Achievement indicators

- 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.
- Consideration is given to extending group and/or one-to-one safeguarding supervision arrangements to include player care and other staff specific welfare responsibilities.
- The Club 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.

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6.2 Safeguarding is actively promoted and embedded within all partnerships and commissioned services.

Achievement indicators

- Safeguarding is a key consideration during activity planning, delivery and reviews.
- Safeguarding policies and expectations are communicated to partners, third parties and suppliers.
- The Club 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 Club and CCO which clearly outlines safeguarding accountability and responsibilities.
- Partners, third parties and suppliers are trained in the Club's safeguarding policies and practices.
- There are quality assurance measures in place to assess safeguarding practice and consistency in delivery.

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

7.1 The Club proactively seeks feedback from stakeholders on a regular basis to strengthen its safeguarding arrangements.

Achievement indicators

- The Club facilitates proactive ways for staff and relevant stakeholders to express their views, participate in decision making and raise concerns.
- There is demonstrable evidence of how feedback is used to develop and/or enhance Club policies and practices.
- There is a supportive internal response to the raising of concerns, complaints and whistleblowing.
- Consultation measures are regularly evaluated and reviewed.

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.

Achievement indicators

- The Club facilitates proactive ways for children and adults at risk to express their views, participate in decision-making and raise concerns.
- There are established online and offline measures used to consult children and adults at risk.
- Children and adults at risk are provided with leadership opportunities.
- Consultation measures are regularly evaluated and reviewed.
- Children and adults at risk are comfortable participating in decision-making and communicating their views and concerns.
- 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.

Note: Achievement indicators are not exhaustive



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