

Safeguarding Children Policy

Procedure and Guidance

Burnley Football Club & Burnley FC in the Community

FOREWORD AND POLICY INTRODUCTION

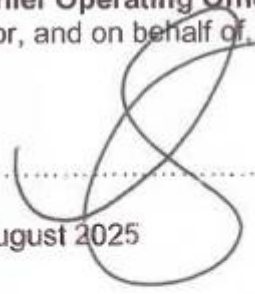
Burnley FC and Burnley FC in the Community are committed to the welfare and safety of all children. Safeguarding is everyone's responsibility. This policy ensures all concerns are responded to promptly, consistently, and in line with legislation, football regulations, and best practice.

The BFC and BFCitC safeguarding policy provides details of different types of abuse, guidance on identifying issues and procedures and support for use by staff and volunteers.

Mandatory legislation and best practice underpin the activities which are available at BFC and BFCitC and this policy will help to ensure that responses to activities and issues are consistent considering local authority guidance, law and individual needs across our community. This policy will be reviewed every year or if there is a change in legislation or significant organisational changes.

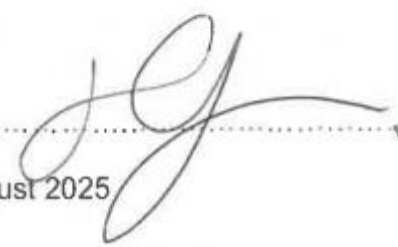
For clarification, this policy applies to all activities, departments, and areas of Burnley FC and Burnley FC in the Community, including the Men's and Women's 1st Teams, Boys Academy and Girls ETC (managed through BFCitC). From here on in, the mention of 'BFC' or 'BFCitC' is read to mean all of the above.

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For, and on behalf of, Burnley Football Club



August 2025

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For, and on behalf of, Burnley FC in the Community



August 2025

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SAFEGUARDING CHILDREN AND YOUNG PEOPLE POLICY OVERVIEW

OUR SAFEGUARDING COMMITMENT:

WE RECOGNISE THAT:

- The welfare of children and adults at risk is paramount.
- All children and adults at risk, regardless of age, disability, gender, gender reassignment, pregnancy and maternity, marriage and civil partnership, race, religion and/or sexual orientation (defined as Protected Characteristics within the Equality Act 2010) have the right to equal protection from all types of harm or abuse.
- Working in partnership with children, adults at risk, and their family or support network is essential in promoting and embedding this policy.

THE PURPOSE OF THIS POLICY:

- To manage the safeguarding arrangements for all Club and Community activities, including the Men's and Women's programmes, Academy provision, and the Girls ETC, ensuring consistent safeguarding standards across all pathways and teams.
- To provide colleagues and volunteers with guidance on procedures they should adopt if they suspect a child or adult at risk may be experiencing, or be at risk of, harm.

WE WILL SEEK TO SAFEGUARD CHILDREN AND ADULTS AT RISK BY:

- Providing safety and protection whilst in the care of BFC and BFCitC from all types of abuse or harm.
- Listening, responding, and acting appropriately and addressing matters through the correct procedures.
- Working closely with local statutory agencies and other partners to promote and safeguard the welfare of all.
- Sharing information sensitively and timely and appropriately with relevant partner agencies.
- Providing targeted safeguarding training to all staff across BFC and BFCitC to ensure they are clear on their responsibilities, professional boundaries and appropriate behaviours.
- Implementing and monitoring 'Safer Recruitment' in accordance with local and government guidance and legislation.
- Maintain documents confidentially in accordance with relevant data protection legislation.
- Having a Safeguarding team who are visible, available, and responsive to requests for support, guidance, and advice.

WHAT IS SAFEGUARDING

The term 'Safeguarding' is a shortening of the phrase:

“SAFEGUARDING AND PROMOTING THE WELFARE OF CHILDREN, YOUNG PEOPLE AND ADULTS AT RISK”

THE SAFEGUARDING PROGRAM AT BURNLEY FOOTBALL CLUB AND BURNLEY FC IN THE COMMUNITY BROADLY INCLUDES:

- Protecting all children, young people, and adults at risk from abuse or harm, or the risk of this.
- Ensuring that staff comply with relevant laws, regulations and are employed safely using best practice and industry leading 'Safer Recruitment' guidance
- Ensuring staff read, understand and are always bound by the Safeguarding policy and sign up to codes of contact and implement these.
- Creating a positive environment for all visitors, staff and participants.
- Ensuring all staff are aware of their role, have clear understanding on how to report concerns and who to report to and are supported to do this effectively.
- Ensuring all attendees regardless of age, gender, racial origin, religion, disability, sexual identity, culture and language enjoy sport and other activities safe from harm, abuse or discrimination.
- Making external agencies aware of the policy and the codes of conduct we work to.

WHO WILL WE WORK WITH TO KEEP SAFE?

WE WORK WITH A RANGE OF CHILDREN, YOUNG PEOPLE AND ADULTS AT RISK.

- A child or young person is anyone aged under 18.
- An adult at risk is any adult aged 18 years and older who:
 - has a need for care and support (whether or not the Local Authority is meeting any of those needs):
 - is experiencing, or at risk of, abuse or neglect; and
 - as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of, abuse or neglect.
- Where young people (aged 18 or over) are still receiving the support of children's services and a safeguarding issue is raised, the matter should be dealt with through adult safeguarding arrangements.

CHILD

is defined by UK laws and United Nations as someone under the age of 18 years.

STAFF/ VOLUNTEERS

is anyone attending activities or sessions whether paid or unpaid on behalf of BFC or BFCitC where children, young people and adults may attend.

ABUSE

is a developing term which encompasses emotional, physical, sexual and neglect but also covers bullying, discrimination and financial.

HARM

covers harm which has or may have been caused and the risk of future harm, it refers to injury ill treatment or abuse whether willfully, neglectfully or accidentally which impacts on health, development, social inclusion, education or participation.

ACTIVITY/ SESSION

covers any matches, events, coaching or community activities for which BFC or BFCitC has responsibility for the care of attendees.

ATTENDEES

refers to anyone who attends an activity as either a participant or player at a match or activity, academy or community event.

CHILD PROTECTION

this is a statutory system through Local Authority which has identified a child to be a risk of significant harm under one of the four categories of Child Protection abuse; sexual, physical, emotional or Neglect. This is to offer support to families in a measured way to prevent ongoing harm.

PARENTAL RESPONSIBILITY

is the person legally responsible for the child, as a club we will take appropriate steps to ensure that consent is attained effectively.

DUTY OF CARE

BFC and BFCitC have both a legal and moral responsibility when providing care to those attending activities. This includes people being vigilant and reporting issues and concerns appropriately and these concerns are taken seriously, and appropriate action taken.

CONSENT

is the agreement of a parent/legal guardian to allow someone under the age of 18 to take part in activities.

DESIGNATED PERSONS

are members of staff who hold specific operational responsibility for safeguarding.

PREMIER LEAGUE CHARITABLE FOUNDATION (PLCF)

is the charity which has the primary objective of governance and distribution of funds, in the form of grants, particularly to Club Community Organisations, enabling them to deliver community focused activities which have a positive impact on beneficiaries.

CONSIDERATIONS FOR ADDITIONAL VULNERABILITIES

AGE, UNDERSTANDING AND CAPACITY

The term child applies to anyone from birth up to 18 years of age, this policy covers the entire age range. We will be considerate of stages of development and communicate with the children at an appropriate level. We will ensure that children are spoken with and their views and opinions are considered in any decision made about them. Older children will be supported to ensure their views are heard when decisions which affect them are being made. We will be vigilant to support vulnerable groups regardless of age to make sure they also are safe from harm and considered when making decisions.

CULTURE

BFC and BFCitC acknowledge cultural practices and beliefs differ greatly and staff will of course be sensitive to cultural differences, however our safeguarding policy will be applied if we consider a child to be at risk of harm. This will include activities provided off site and by partner agencies.

LANGUAGE AND COMMUNICATION

Some people who attend our sessions may experience difficulties in communication whether this be due to a disability, capacity or not using English as a first language and staff must be considerate about this. We will be patient and establish what support you may need to communicate effectively, including interpreters, parents/carers support, BSL etc.

SAFEGUARDING PLAYERS

Players can face additional vulnerabilities due to their position in sport, they may experience constant pressure, poor mental health, homesickness, addiction, self-harm or bullying. They may also be vulnerable to coercion for financial gain for their talents. Social Media is also a concerning area relating to vulnerability and should be discussed with players. These areas will be discussed with Academy players as part of their life skills work.

OPEN-AGE PLAYERS

Occasionally players who have not reached the age of 18 may play in an adult team, when this is the case consideration will be given to both the players physical and emotional capacity and the players parents will be consulted. Welfare monitoring will be in place in these circumstances.

ADDITIONAL VULNERABILITY

Additional vulnerabilities can often be difficult to identify – sexual orientation, culture, disabilities, neurodiversity etc. are not always evident but do often have the potential to make an individual more vulnerable. Children are much more identifiable and easier to support; However, our priority will always be to safeguard the welfare of children when they are in our care once any kind of vulnerability is identified.

EQUALITY AND DIVERSITY

Burnley FC and BFCitC are committed to ensuring equality of opportunity for all. We do not tolerate any form of discrimination or unequal treatment. We strive to create a culture of dignity and respect in which everyone feels safe and supported.

We comply with the Equality Act 2010 and apply our internal Equality and Diversity Policy across all Club and Community activities.

BFC and BFCitC have an Equality and Diversity Policy which is monitored and reviewed annually as a minimum.

This Safeguarding Policy does not contradict the contents of the Equality and Diversity Policy. A full copy of the Equality and Diversity Policy can be found on the link below:

[Equality, Diversity and Inclusion | BurnleyFC](#)

***SAFEGUARDING
CHILDREN AND
YOUNG PEOPLE
TYPES OF ABUSE***

POSITION OF TRUST

Those who have responsibility for, authority of and influence over, children, are in Position of Trust with those in their care.

A Position of Trust is usually one which one party has power or influence over the other by virtue of their role or by the type of activity. It is, therefore, essential that those in the positions of responsibility understand the power that they may have over those in their care, and how they must behave.

This means that those in a Position of Trust MUST not:

- Use their position to gain access to information relating to children for their own or any others advantage. Such information must only be shared to meet the needs of the child or young person.
- Use their power to intimidate, threaten, coerce or undermine children
- Use their status or role to promote inappropriate relationships and professional boundaries must always be maintained

LOW LEVEL CONCERNS

Low-level concerns refer to behaviours or actions by staff, volunteers, or individuals in positions of trust that do not meet the threshold of serious harm or abuse but nonetheless cause a sense of unease, doubt, or a “nagging feeling” that something is not quite right.

These may include conduct that is inconsistent with our Code of Conduct, displays of poor professional boundaries, or behaviour that could be misinterpreted, even if not malicious in intent.

Reporting low-level concerns helps us identify patterns of behaviour at an early stage, ensures that professional standards are maintained, and promotes a culture of openness, transparency, and continuous safeguarding vigilance.

Low-level concerns may include, but are not limited to:

- Overly personal or unnecessary communication with children or adults at risk (e.g., private messaging, personal compliments).
- Inconsistent professional boundaries, such as favouritism or special treatment.
- Comments or jokes that are inappropriate, suggestive, or could be interpreted as such.
- Being alone with a child in a non-transparent context (e.g., closed-door environment) without a clear, legitimate reason.
- Minor breaches of organisational policies or the Code of Conduct.

POOR PRACTICE

This occurs whenever staff or volunteers fail to provide the highest standards of care and support in their working practice. Poor Practice which is allowed to continue can become abuse. Poor practice is never acceptable and will be treated seriously with appropriate action, including (if necessary) disciplinary action. An individual may not be aware that poor practice or abuse is happening as some may deem this behaviour as acceptable.

The FA provides the following examples of poor practice, not limited to:

- Insufficient care is taken to avoid injuries, through excessive training or inappropriate session considering age, maturity, experience and ability of players.
- Allowing abusive or concerning practice to go unreported (e.g. unfair criticism, bullying or ridicule of any kind)
- Allowing hazing or initiation to go unreported.
- Placing children in compromising or uncomfortable positions by contacting them inappropriately or via social media.
- Ignoring Health and Safety guidance.
- Failure to adhere to Club and Governing Body codes of practice and guidance.
- Giving continued and unnecessary preferential or negative treatment to individuals

WHAT IS RISK/ABUSE - HOW DO WE RECOGNISE IT?

Somebody may abuse or neglect an individual by inflicting harm or by failing to act to prevent harm. Abuse can potentially take place in a number of different settings, these could include a family environment, peer to peer, an institutional or community setting by those known to them or by others or online or via social media platforms. They may be abused by an adult or group of adults, children and other young people or another Adult at Risk. The following types are split into children and adults at risk, and are deemed to be the most prevalent however abuse can fall into numerous categories. If you feel something is not right – speak with the Safeguarding Team.

TYPES OF ABUSE - CHILDREN

NEGLECT

Neglect takes place if adults fail to meet a child or young person's basic physical needs, for example, their needs for food, warmth and clothing, or emotional needs such as attention and affection.

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 sport, physical abuse could happen where training methods are inappropriate for the developmental age of the child or young person.

SEXUAL ABUSE

Sexual abuse occurs when children or young people are used to meet another person's sexual needs. This includes but is not limited to:

- any form of sexual behaviour with a child or young person (by an adult or another child or young person)
- use of sexually explicit language and jokes.
- inappropriate touching; and/or
- exposure to pornographic material and content.

EMOTIONAL ABUSE

Emotional abuse can be inflicted by other children and young people as well as by adults. Children and young people who are being abused or bullied will also experience emotional abuse.

This includes but is not limited to:

- frequent threatening, taunting or sarcastic behaviour.
- withholding affection.
- being extremely over-protective.
- racist or sexist behaviour; and/or
- demeaning initiation ceremonies.

BULLYING

Bullying is behaviour which hurts another child or young person physically or emotionally. Bullying can involve, but is not limited to, coercing, requiring, forcing or tolerating any humiliating, unwelcome or dangerous activity.

TYPES OF ABUSE - ADULTS

PHYSICAL ABUSE

Physical abuse of an adult at risk can include, but is not limited to, assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.

SEXUAL ABUSE

Sexual abuse of an adult at risk occurs in the event of sexual acts to which the adult in question has not willfully consented.

This can include but is not limited to:

- rape.
- sexual exploitation;
- indecent exposure;
- sexual harassment or assault;
- inappropriate looking or touching;
- sexual teasing or innuendo;
- sexual photography;
- sexting and revenge porn;
- subjection to pornographic material and content; and
- witnessing sexual acts without consent.

DISCRIMINATORY ABUSE

Discriminatory abuse occurs when an act or act of omission occurs, which discriminates based on a person's religion, ethnicity, sex, gender, age, disability or sexual orientation or any of the protected characteristics of the Equality Act. It may constitute hate crime and could include, but is not limited to:

- providing meals not suitable for religious or cultural needs;
- inappropriate aids or adaptations;
- verbal abuse; and/or
- bullying or degrading treatment.

ORGANISATIONAL OR INSTITUTIONAL ABUSE

Occurs when there is neglect and poor care practice within an institution or specific care setting, such as a hospital or care home, or in relation to care provided in one's own home.

NEGLECT OR ACTS OF OMISSION

Neglect or acts of omission in relation to adults at risk can include, but is not limited to:

- ignoring medical, emotional or physical care needs;
- failure to provide access to appropriate health, care and support or educational services; and/or
- the withholding of the necessities of life, such as medication, adequate nutrition and heating.

FINANCIAL OR MATERIAL ABUSE

This occurs through the unauthorised use or theft of money or property and can include, but is not limited to:

- theft
- fraud
- exploitation (e.g. pressure in connection with wills, property, inheritance or financial transactions);
- misuse or misappropriation of property, possessions or benefits; and/or
- depriving a person of access to their money, property or assets.

PSYCHOLOGICAL OR EMOTIONAL ABUSE

Psychological or emotional abuse of an adult at risk occurs through deliberate non-physical action intended to manipulate or hurt somebody mentally and emotionally.

This can include, but is not limited to:

- threats of harm or abandonment;
- deprivation of contact or isolation;
- humiliation;
- blame;
- verbal abuse;
- bullying or cyber bullying;
- harassment or intimidation;
- coercive control (e.g. controlling or observing victim's daily activities);
- restriction of movement; and/or
- intercepting messages or phone calls.

SELF NEGLECT

Self-neglect occurs when an individual neglects to care for their personal hygiene, health or surroundings and includes behaviour such as hoarding

NON-RECENT ABUSE

Non-recent child abuse, sometimes called historical abuse, is when an adult was abused as a child or young person under the age of 18. Sometimes adults who were abused in childhood blame themselves or are made to feel it's their fault. But this is never the case: there is no excuse for abuse.

EFFECTS OF NON-RECENT ABUSE

Abuse can have a huge effect on health, relationships and education and can stop people from having the childhood and life they deserve, they might find it harder to cope with life's stresses, getting a job or parenting. They may also develop mental health problems and drug or alcohol issues.

The effects can be short term but sometimes they last into adulthood. If someone has been abused as a child, it's more likely that they'll suffer abuse again. This is known as revictimisation.

The long-term effects of abuse and neglect can include:

- emotional difficulties like anger, anxiety, sadness or low self-esteem
- mental health problems like depression, eating disorders, self-harm or suicidal thoughts
- problems with drugs or alcohol
- disturbing thoughts, emotions and memories
- poor physical health
- struggling with parenting or relationships.

NON-RECENT ABUSE

SPEAK TO A FRIEND OR FAMILY MEMBER

Thinking about talking to someone close to you about abuse can seem frightening. You might not know where to start or may be worried about their reaction. It's important to choose someone you feel you can trust to provide a listening ear.

You don't have to tell them everything. Even if you say very little, speaking to them might help to lighten the load and help you think about what you want to do next.

Talk to NAPAC. NAPAC is the National Association for People Abused in Childhood. NAPAC's trained staff speak with survivors of any type of childhood abuse over the phone, exploring the options available to them such as support groups and counselling to help empower callers to move forward. Calls are confidential, free from UK landlines and mobiles and can be made anonymously.

NAPAC also supports family members, friends and professionals who are helping someone who was abused, advising them on who else can help. The NAPAC website provides a wealth of information and advice, including a postcode searchable database which lists local Trusted organisations who can offer free or low-cost on-going support.

TALK TO YOUR GP ABOUT SEEING A COUNSELLOR

Talking to your GP might be helpful. They can refer you on to appropriate support, like counselling and let you know if the NHS has services for survivors in your local area.

You can also search for a private counsellor using the British Association for Counselling and Psychotherapy website. Finding the right counsellor for you can take time. If therapy hasn't helped you in the past, it might be better for you to try a different counsellor. Ask them whether they have experience of supporting adults who were abused in childhood. Other support sites and services

- Survivors UK offers a range of support services to men who experienced childhood or adult sexual abuse.
- Rape Crisis England and Wales, Jersey, Scotland and Northern Ireland provide a directory of local support services.
- Samaritans is available around the clock 365 days of the year to provide confidential emotional support for people who are experiencing feelings of distress or despair.

Reporting non-recent Abuse

It's never too late to report abuse you experienced. But you don't have to report it to anyone if you don't want to. And no one should pressure or force you to do anything you don't want to.

Some people report non-recent abuse to stop the offender abusing other children. Some find that reporting gives them a sense of closure and helps them to start moving on.

If you do decide to, there are different ways to report you can consider.

Report to the police

If you want to, you can speak to the police about what happened to you. You can report abuse to the police no matter how long ago it happened. You can start by calling 101 and briefly explaining what you're calling about. They'll make sure you're put through to the right team who can support you.

Speak to NSPCC

It's normal to be anxious about reporting and worry about what might happen. If you don't feel comfortable contacting the police or want to find out more about your options, you can contact NSPCC.

Call them on 0808 800 5000, email help@nspcc.org.uk or fill in their online form.

Any reports of non-recent abuse will follow our children's safeguarding reporting procedures.

NEGLECT SIGNS AND INDICATORS

Neglect can be difficult to spot. Having one of the signs doesn't necessarily mean a child is being neglected. But if you notice multiple signs that last for a while, they might show there's a serious problem. Children and young people who are neglected might have:

POOR APPEARANCE AND HYGIENE

- being smelly or dirty
- being hungry or not given money for food
- having unwashed clothes
- having the wrong clothing, such as no warm clothes in winter
- having frequent and untreated nappy rash in infants.

HEALTH AND DEVELOPMENT PROBLEMS

- anemia
- body issues, such as poor muscle tone or prominent joints
- medical or dental issues

- missed medical appointments, such as for vaccinations
- not given the correct medicines
- poor language or social skills
- regular illness or infections
- repeated accidental injuries, often caused by lack of supervision
- skin issues, such as sores, rashes, flea bites, scabies or ringworm
- thin or swollen tummy
- tiredness
- untreated injuries
- weight or growth issues.

CHANGES IN BEHAVIOUR

- becoming clingy
- becoming aggressive
- being withdrawn, depressed or anxious
- changes in eating habits
- displaying obsessive behaviour
- finding it hard to concentrate or take part in activities
- missing school
- showing signs of self-harm
- using drugs or alcohol.

PHYSICAL ABUSE SIGNS AND INDICATORS

Bumps and bruises don't always mean a child is being physically abused. All children have accidents, trips, and falls. And there isn't just one sign or symptom to look out for. But it's important to be aware of the signs. If a child regularly has injuries, there seems to be a pattern to the injuries or the explanation doesn't match the injuries, then this should be reported.

PHYSICAL ABUSE SYMPTOMS INCLUDE:

- bruises
- broken or fractured bones
- burns or scalds.
- bite marks

It can also include other injuries and health problems, such as:

- scarring
- the effects of poisoning, such as vomiting, drowsiness or seizures

- breathing problems from drowning, suffocation or poisoning.

Head injuries in babies and toddlers can be signs of abuse so it's important to be aware of these.

Visible signs include:

- swelling
- bruising
- fractures
- being extremely sleepy or unconscious
- breathing problems
- seizures
- vomiting
- unusual behaviour, such as being irritable or not feeding properly.

SEXUAL ABUSE SIGNS AND INDICATORS

Knowing the signs of sexual abuse can help give a voice to children. Sometimes children won't understand that what's happening to them is wrong. Or they might be scared to speak out. Some of the signs you might notice include:

EMOTIONAL AND BEHAVIORAL SIGNS:

- Avoiding being alone with or frightened of people or a person they know.
- Language or sexual behaviour you wouldn't expect them to know.
- Having nightmares or bed-wetting.
- Alcohol or drug misuse.
- Self-harm.
- Changes in eating habits or developing an eating problem.

PHYSICAL SIGNS:

If a child is being or has been sexually abused online, they might:

- spend a lot more or a lot less time than usual online, texting, gaming or using social media.
- seem distant, upset or angry after using the internet or texting.
- be secretive about who they're talking to and what they're doing online or on their mobile phone.
- have lots of new phone numbers, texts or email addresses on their mobile phone, laptop or tablet.
- Children and young people might also drop hints and clues about the abuse.

EMOTIONAL ABUSE SIGNS AND INDICATORS

There may not be any obvious physical signs of emotional abuse or neglect. And a child might not tell anyone what's happening until they reach a 'crisis point'. That's why it's important to look out for signs in how a child is acting.

As children grow up, their emotions change. This means it can be difficult to tell if they're being emotionally abused. But children who are being emotionally abused might:

- seem unconfident or lack self-assurance
- struggle to control their emotions
- have difficulty making or maintaining relationships
- act in a way that's inappropriate for their age.

The signs of emotional abuse can also be different for children at different ages. Babies and pre-school children who are being emotionally abused or neglected might:

- be overly affectionate to strangers or people they don't know well.
- seem unconfident, wary or anxious.
- not have a close relationship or bond with their parent
- be aggressive or cruel towards other children or animals.

Older children might:

- use language you wouldn't expect them to know for their age.
- act in a way or know about things you wouldn't expect them to know for their age.
- struggle to control their emotions.
- have extreme outbursts.
- seem isolated from their parents.
- lack social skills.
- have few or no friends.

***PROCEDURES
FOR DEALING
WITH AN
ALLEGATION,
CONCERN OR
DISCLOSURE***

SIGNS AND INDICATORS TO IDENTIFY A CONCERN

Children can be reluctant to tell someone when they are being abused, so it is essential that every adult is aware of the possible signs and indicators that a child'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.

Never allow a child's disability or cultural difference to explain away concerns.

You may have one piece of information that, when added to that of others, forms a clear picture of abuse. Only if everyone shares their information can a full picture be seen, and risks identified. **At BFC and BFCitC we are aware it is not our job to decide whether someone is being abused - however it is our responsibility to share our concerns.**

RECORDING AND REPORTING DISCLOSURES AND REFERRING

We know that concerns can be shared in several different ways and we are fully committed to taking all information seriously and acting appropriately. If there is an immediate risk of harm, a serious injury or a criminal offence may have been committed we would involve the appropriate statutory agency immediately. Once this has been done the Safeguarding team will be informed and we will follow our own Safeguarding procedures alongside those of statutory agencies.

Making clear notes detailing the following:

- The date and time of the concern, the names of those involved and the names of any witnesses.
- Only factual information should be documented; opinions should not be shared or if they are, it must be clear that these are opinions.
- Details of the incident include a body map if appropriate.
- Actions taken and the reasons for these actions.
- We are aware that any notes made may be used as evidence, court proceedings or disciplinary procedures and we will fully comply with any requests made by statutory agencies.

Other concerns may be considered under the following headings:

- The behaviour of an adult towards a child
- Issues raised during recruitment processes.
- Allegations by a child witnessing abuse.
- The behaviour of one child towards another
- An abuse of a position of Trust
- Concerning behaviour by a colleague whilst within or out of work which may compromise their position within BFC or BFCitC.

Through training, staff and volunteers, become more confident in identifying and dealing with concerns, allegations or disclosures.

TO ENSURE CONSISTENCY WE WILL ADHERE TO THE FOLLOWING:

1 RECOGNISE

Recognising abuse or harm is often not easy. You need to act when you suspect harm or abuse may be occurring, not just when you are sure that harm has taken place. This does not mean you are making assumptions or allegations; it means that there is a concern that must be reported. Once this information is reported, the Safeguarding Team will act to find out more information.

2 RESPOND

When harm or abuse is disclosed to you by a child or young person, your role is to simply report the facts, as you have been told, to the Safeguarding Team or if serious, statutory agencies. The disclosure may come in full, suddenly and contain lots of detail but equally may just be an alluding to abuse. Although there is no responsibility for you to investigate the matter, when any type of harm or abuse is disclosed, where appropriate, you may try to gather the basic facts from the person making the disclosure to you by asking questions like; Who, What, Where, When, Which, Tell me, Describe to me, Explain to me.

3 to REPORT

Your concern needs to be shared appropriately with either the Safeguarding Team or Statutory Services verbally in the first instance and then this must be followed up on a MyConcern within 24 hours – either the desktop or mobile app.

4 RECORD

Our Club has a central reporting system, My Concern either desktop or mobile app, which all reports must be uploaded onto, this must be recorded either on the day or within 24 hours at most. This report online must include detailed description of what has occurred, when where, how and who was involved. Details of witnesses and exactly what was said. You MUST stick to the facts and use the individual's words and phrases and avoid feelings or opinions. You should, where possible, record the child or young person wishes and feelings about this.

EXTERNAL AGENCIES

DISCLOSURE AND BARRING SERVICE

If an allegation is made and criteria is met, then a referral will be made by the Head of Safeguarding to DBS UK to inform them of the allegations to ensure risk is managed.

LOCAL AUTHORITY OR CRIMINAL INVESTIGATION

Staff are not required to determine if abuse has taken place, staff will report any concerns or allegations. BFC and BFCitC will work with any agencies where abuse is suspected, and whilst this may not proceed in law, the local authority may continue as they look at risk of further harm. Any internal investigation will not impede any statutory investigations..

STATUTORY AUTHORITIES

The Police should be contacted if a crime has been committed against a Child or if a Child is in immediate danger.

A referral should be made to the Local Authority Designated Officer (LADO) where an individual who is in a position of Trust has:

- Behaved in a way that has harmed, or may have harmed a Child;
- Possibly committed a criminal offence against or related to a Child; or
- Behaved towards a Child in a way that indicates they may pose a risk of harm. The LADO is responsible for management and oversight of all Child protection allegations made against Staff and volunteers who work with Children.

SUPPORT FOR STAFF AFTER A DISCLOSURE OR SAFEGUARDING REPORT

Dealing with any type of allegation, disclosure or safeguarding concern may have an impact on the wellbeing of staff involved. Staff will be allocated to a member of staff should they feel they need any kind of support in relation to this.



FOOTBALL'S SAFEGUARDING FRAMEWORK

- The FA sets the safeguarding policy and regulatory framework across the game.
- The Premier League (PL), the Premier League Charitable Foundation (PLCF) and the FA have safeguarding policies and procedures in place that govern their own activities, as well as rules and requirements and standards that govern BFC and BFCitC safeguarding arrangements.
- BFC and BFCitC implement our own safeguarding policies and procedures that must be consistent with EFL Rules, EFL in the Community Capability Status requirements, FA rules and regulations and Affiliated Football's Safeguarding Policies and Procedures.
- The FA governs the Women's game in England through a comprehensive safeguarding framework that mirrors its wider responsibilities across football.

EMPLOYER ROLE

Concerns about an individual's conduct that fall below the threshold for external referral should be managed internally in line with employer policies. Where the threshold is met, statutory agencies and/or The FA may be involved.

In situation where there is a sexual allegation these must be shared with the FA Safeguarding Team for oversight and further additional support by them if so required.

THE FA

The FA has a team made up of safeguarding professionals who manage referrals. Where appropriate, they work in partnership with statutory authorities, the DBS, County FAs, the PL, the EFL and football clubs when managing safeguarding cases. They assess people who pose, or may pose, a risk of harm and put in place safeguards. The FA's regulatory framework enables them to act against BFC or BFCitC staff or participants who breaches The FA safeguarding policy or regulations. On an individual level, the FA can put in place risk management measures ranging from education, mentoring and supervision agreements, to interim and permanent suspensions.

FOOTBALL ASSOCIATION (THE FA)

PL/EFL/FA and/or PLCF or EFL in the Community acting in a regulatory capacity. When in receipt of a safeguarding referral, may take the following action, including:

- Providing support and guidance.
- Having oversight and working with BFC/BFCitC to ensure that internal procedures and football regulations are followed.
- Agreeing a BFC/BFCitC-led internal investigation with the outcome shared with the Football Authorities.
- Conducting a joint investigation with the FA.
- Commissioning an independent case review (possibly in conjunction with the FA).
- Participation in multi-agency strategy meetings.
- Working with BFC/BFCitC to implement agreed multi-agency strategy meeting actions.
- Working with Police and football media relations to manage communication.
- Issuing of sanctions against BFC where PL Rules have been breached.
- Suspension or termination of BFCitC grant payments by the PLCF.
- Working with BFC/BFCitC to ensure that learning outcomes are implemented to mitigate risk of recurrence.
- Sharing anonymised learning from cases to strengthen safeguarding provision across the game.

THRESHOLDS FOR REFERRAL TO THE FOOTBALL ASSOCIATION

A safeguarding referral must be made by the Head of Safeguarding to The FA within 24 hours (or as soon thereafter as practicable) where any of the following thresholds are met:

- Any allegation of abuse of a Child by any person who has previously, does currently or is seeking to work at The FA, PL, PLCF, EFL, EFL IN THE COMMUNITY, BFC or BFCitC whether in a paid, voluntary, consultancy or third- party capacity.
- Any allegation of a sexual nature, regardless of age of victim or age of perpetrator.
- Any referral to or from any external authority (including, without limitation; the Police, Local Authority, DBS or Charity Commission) about abuse of a Child by any person who has previously, does currently or is seeking to work at The FA, PL, PLCF, EFL, EFL in the Community, BFC or BFCitC whether in a paid, voluntary, consultancy or third- party capacity.
- A third or subsequent allegation of poor safeguarding practice by any person who has previously, does currently or is seeking to work at The FA, PL, PLCF, EFL, EFL in the Community, BFC or BFCitC whether in a paid, voluntary, consultancy or third- party capacity.

LISTENING CULTURE

We believe that Children have the right to be heard and be involved in decisions that affect them. BFC and BFCitC will always act in the best interests of Children, and we will seek their views as far as is feasible taking their age, understanding and capacity into account when responding to disclosures and safeguarding concerns.

In the absence of consent from an individual making a disclosure or to whom the information relates, we will take proportionate action that does not increase the risk of harm. This may include taking action and/or sharing information where there is an overriding duty to do so for legitimate purposes.

We will engage Children about how best to respond to their safeguarding situation in a way that enhances involvement, choice and control as well as improving wellbeing and safety.

We are committed to ensuring that safeguarding is person-led, trauma informed and outcome-focused.

CONSENT WHEN MAKING A REFERRAL

Where a child is considered to be at risk of harm, consent to share concerns with appropriate agencies is not required, it is considered good practice to discuss these actions with the parent/ carer/legal guardian but should not be done when this may place the child at risk of further harm or there are suspicions of fabricated Induced Illness.

BFC and BFCitC will always respect the rights of a child to share their views in relation to any decision which may impact on them is concerned, and when making a referral to Children's Social Care, children should be advised that this must happen to ensure their safety, however reassurance will be given to the child about this. BFC and BFCitC will try where possible to gain consent appropriately but where this is not possible the best interests of the child will be paramount and fully considered.

THE SEVEN GOLDEN RULES FOR INFORMATION SHARING

- | | |
|--|---|
| <ol style="list-style-type: none">1. Remember that the General Data Protection Regulations, Data Protection Act 2018 and human rights laws are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.2. Be open and honest with the child (and/ or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.3. Seek advice from other practitioners or your information governance lead if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.4. Where possible share with consent and, where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful reason to do so, such as where safety may be at risk. You will need to base your judgment on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared. | <ol style="list-style-type: none">5. Consider safety and well-being: Base your information sharing decisions on considerations of the safety and wellbeing of the child and others who may be affected by their actions.6. Necessary, proportionate, relevant, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those people who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (Practitioners must always follow their organisation's policy on security for handling personal information).7. Keep a record of your decision and the reasons for it - whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose. |
|--|---|

1

Child makes a disclosure

2

Explain that you will have to pass the information on.

Ask for further details - Who, When, Where, How.

Keep calm and reassure the child.

3

*Allow the child to talk at their own pace, using their own words.
Do not pressure them into telling you any more than they want to.*

Avoid going over the information, you only need to gather basic information to inform your decision to make a referral.

4

Where the child is at immediate risk of harm, contact the police and/or Children's Services.

Keep the child at the session until advised by Children's Services, Police or Head of Safeguarding.

Contact the Safeguarding Team and Line Manager.

Refer to contacts list if the Safeguarding Team are unavailable.

5

*Make a detailed, factual record of what you have heard/seen.
Include quotes, dates, times, names, and contact details.*

Complete referral on MyConcern within 24 hours.

Make any external referrals in accordance with Local Authority, The FA and PL/PLCF requirements.

CONFIDENTIALITY, INFORMATION SHARING AND RECORD KEEPING

All staff must understand the principles of confidentiality, particularly in the context of safeguarding and child protection. While it is important to respect a child's privacy, staff must never promise confidentiality. Children should be informed that concerns may need to be shared with others to keep them safe.

Any safeguarding concern must be reported verbally without delay and recorded on **MyConcern** (via desktop or mobile device) within 24 hours, or as soon as practically possible after the incident.

Safeguarding Information should be shared in all cases where doing so may serve to protect against a risk of harm to, and/or protect the wellbeing of, any Child or Adult at Risk. This guidance is consistent with Government guidance which highlights (among other things):

- Fears about sharing Safeguarding Information cannot be allowed to stand in the way of the need to Safeguard Children and Adults at Risk.
- Data protection legislation, human rights law or other relevant legislation and guidance does not prevent or limit the sharing of information for the purposes of Safeguarding Children and Adults at Risk.
- Relevant personal information can be shared lawfully if it is to keep a Child or Adult at Risk safe from harm or to protect their wellbeing.

In general, personal information should only be shared with third parties (including external agencies) with the consent of the individual concerned. However, where there is a safeguarding risk, consent is not required. The law allows for the sharing of confidential information without consent where it is necessary to protect the welfare of a child. Decisions to share must always be proportionate, justifiable, and based on the specific circumstances. Legal advice, through our General Counsel, should be sought if there is any uncertainty.

Accurate and timely record keeping is essential to effective safeguarding. The Club maintains clear expectations for documenting concerns, recording the status of those records, and identifying when and how information should be shared with relevant agencies.

SAFEGUARDING CONCERNS PROCEDURES

REPORTING SAFEGUARDING CONCERNS

Upon discovering/receiving a safeguarding concern, make contact with the Safeguarding Team to inform them of the nature and to get support and guidance

If child requires immediate medical attention, arrange this and ensure that the medic is informed that there may be a child protection concern or allegation. Consideration should be given that if there is an immediate risk of harm, contact should be made with the Police on 999 or Local Authority children's social care duty team on 0300 1236720



Make an accurate report of the concern ensuring to keep it factual. Record as much detail as possible, including dates, times, names, locations, injuries, concerns and specific words. My Concern is the safeguarding system used



If required - Head of Safeguarding submits a written safeguarding referral to Children's Social Care/LADO and considers need for support or advice for the original referrer or others involved. This must be saved and recorded on My Concern



Internal information sharing

HoS must also inform:

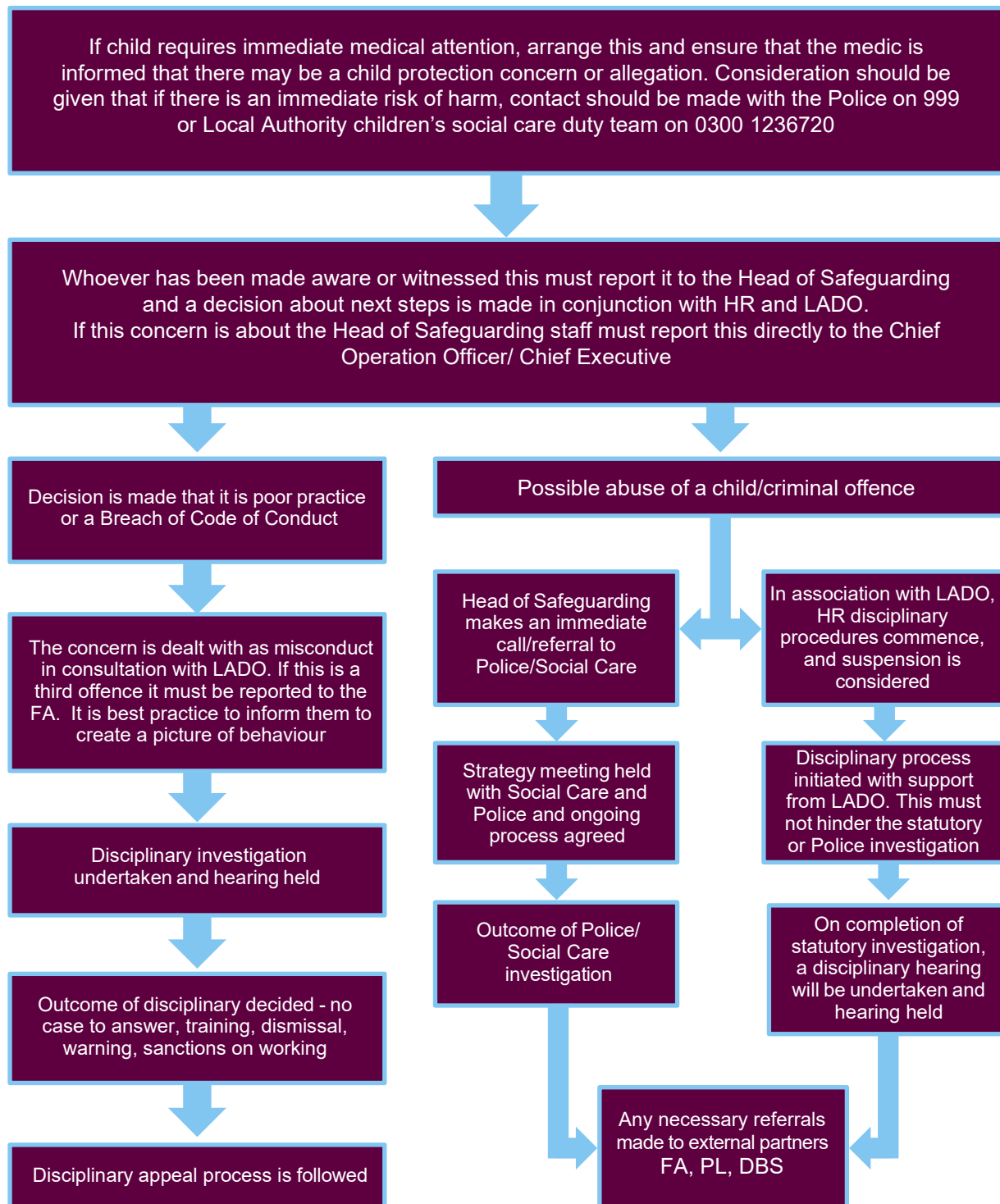
Senior Safeguarding Lead (BFC)
Chief Executive Officer/SSL (BFCitC
Head

External Info sharing

HoS must consider/complete referrals to the following:

Football Association, Premier League/PLCF
LADO/DBS
Police & Children's Social Care or any
other organisations deemed
appropriate

REPORTING CONCERNS ABOUT A MEMBER OF STAFF



Should a concern be raised about the Head of Safeguarding you should contact either:

BFC - Matt Williams, Chief of Operating Officer | m.williams@burnleyfc.com

BFCitC – Helen Gurman, Chief Executive Officer | h.gurman@burnleyfc.com

PL – Jess Addicote, Director of Safeguarding | j.addicote@premierleague.com

CONCERN CATEGORISATION

To ensure reports and concerns are managed effectively we have developed a Categorisation for intervention and support requirements. Initial triage will be undertaken by the Head of Safeguarding and an initial safeguarding category decided, this will then be allocated to a member of the safeguarding team who will gather information, once this is done a discussion will be undertaken and a review of the initial safeguarding category will be undertaken.

The Categories are:

- **Level 3 – Child protection** – child is at immediate risk of harm, Social Care and Police need to be contacted immediately
- **Level 2 – Support and Referral** – child has shared concerns; staff will identify support and signpost to appropriate agency to offer support
- **Level 1 – Welfare and Support** – child has issues around them which they may need ongoing welfare support, this is not considered a safeguarding issue in the start but may develop into such.

Allegations against staff Categorisation:

- **Staff High** – concerns that leaving the staff member in place could result in further harm to a child or young person.
- **Staff Low** – Poor practice which needs a disciplinary response which may involve training needs.

RECORD KEEPING AND DATA STORAGE

The importance of good record making and keeping is essential in safeguarding, this shows the original concern and actions taken to deal with the issue. Good records help us:

- Identify of patterns of concern which may need ongoing intervention or group training.
- Monitor and manage our safeguarding practice to provide evidence in audit of our robust effective safeguarding policy and procedures.

All safeguarding records are sensitive and will be managed in accordance with data protection legislation on a central record which is fully compliant with GDPR.

We will follow all relevant Data protection legislation when collecting data during activities, we will store data appropriately and destroy within recommended timescales.

Before we gather data for use in relation to marketing or photos/videos which may be used for marketing, we will always obtain consent.

GDPR AND DATA PROTECTION

Where, in the judgement of the Head of Safeguarding, a child is thought to be at risk, consent is not required if it is thought that by requesting it could put the child at further risk of harm. Decisions to share personal data without consent, in relation to a concern must be recorded on the single central record. Data relating to safeguarding concerns will be retained securely until 30 years after the end of the activity, e.g. contract end, legal resolution or last entry in register.

An extended retention is in force for safeguarding records due to the ongoing independent inquiry into child sexual abuse, where the average time to report a concern is 26 years. In exceptional circumstances this can be extended:

- The records provide information about a child's history which they may wish to access later
- The information in the records is relevant to legal action which has started but not concluded
- The records are archived for historical reasons as they are relevant to organisational legal proceedings

Personal data stored in relation to a safeguarding concern should include any necessary information to inform practice and responses and minimise risk to children. Any errors which are made when making a recording related to safeguarding must be corrected and notes made to support the reason for the change, all data recorded in relation to safeguarding is processed and stored securely in a single central record with access restricted to those with actions or safeguarding responsibility.

This guidance is made under the requirements of the GDPR 2018, the Data Protection Act 2018 Schedule 1 part 4 sections 38,39 and 40 and Working Together to Safeguarding Children 2018. The policy sets out how personal data relating to safeguarding cases will be processed.

WORKING WITH PARTNERS OR EXTERNAL AGENCIES AND COMPANIES

We have developed positive, effective relationships with our partners and external agencies and companies, this will support us to ensure that our safeguarding obligations are reflected and embedded in these relationships. To ensure this is done thoroughly all areas and activity leads should speak to the safeguarding team prior to planning an activity which may involve children. Whether it be a Matchday Activation, an Academy trip or a new Community initiative or programme.

The use of a Service Level Agreement making thorough reference to safeguarding provision and/or the completion of the Check and Challenge Tool, will ensure that we assess the level of safeguarding and partner suitability, using our policy as a standard and measuring partners, external agencies and companies against this. Demonstrating a specific procedure for handling safeguarding concerns, sharing important contact details and being clear in expectations is key to achieving this.

APPENDIX

OTHER CATEGORIES OF ABUSE

Bullying	Is the persistent or repeated hostile or intimidating behaviour towards a person this could be though physical, verbal or online behaviour.
Hazing	Hazing is any rituals, initiation activities, actions or situations, with or without consent, which recklessly, intentionally or unintentionally endangers the physical or emotional wellbeing of Children.
Peer-on-peer abuse	Children can be taken advantage of or harmed by their peers. Peer-on-peer abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between individuals and within relationships (both intimate and nonintimate).
Poor Practice	Poor practice occurs children are not given the due care necessary which results in a compromise of their welfare, when we allow poor practice to go unreported, we fail to ensure the safety of vulnerable groups.
Grooming	Grooming is when someone builds an emotional connection with a child to gain their Trust for the purposes of abuse or exploitation. Grooming happens both online and in person.
Child sexual exploitation	Child sexual abuse occurs where an individual or groups of people take advantage of an imbalance of power to coerce, manipulate or deceive a Child into sexual activity in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation can also take place using technology.
County lines	County lines are the criminal distribution of drugs by gangs from the big cities into smaller towns and rural areas using Children. Gangs recruit Children through deception, intimidation, violence, debt bondage and/or grooming.
Prevent - Radicalisation	Radicalisation is comparable to other forms of exploitation, such as grooming and child sexual exploitation. Radicalisation can be defined as the process by which people come to support terrorism and violent extremism, and in some cases participate in terrorist groups and activities. Violent extremists often use a persuasive rationale and charismatic individuals to attract people to their cause. The aim is to attract people to their reasoning, inspire new recruits and embed their extreme views and persuade vulnerable individuals of the legitimacy of their cause. This may be direct through a relationship, or through social media. There is no clear profile of a person who is more likely to become radicalised. The process of radicalisation varies from person to person, as does the timescale of the radicalisation process. However, there are some factors that may make an individual susceptible to exploitation by violent extremists, for example identity or personal crisis, unemployment or underemployment, family or friends involved in extremism and relevant mental health issues. None of these factors should be considered in isolation but in conjunction with the circumstances of the individual.

Female genital mutilation (FGM)	FGM involves procedures that intentionally alter or injure female genital organs for non-medical reasons. The procedure has no health benefits for girls and women. The Female Genital Mutilation Act makes it illegal to practice FGM in the UK or to take women and girls who are British nationals or permanent residents of the UK abroad for FGM whether it is lawful in another country or not.
Cyberbullying	Cyberbullying is the use of technology to harass, threaten, embarrass, humiliate, spread rumours or target another person. It occurs among Children
Discriminatory abuse	Discriminatory abuse or bullying because of discrimination occurs when motivated by a prejudice against certain people or groups of people. This may be because of an individual's ethnic origin, colour, nationality, race, religion or belief, gender, gender reassignment, sexual orientation or disability. Actions may include unfair or less favourable treatment, culturally insensitive comments, insults and 'banter'. Discriminatory behaviour is unacceptable and will be reported to the FA. This includes incidents on and off the pitch (including social media).
Infatuations	Children may develop an infatuation with a member of Staff who works with them. Such situations should be handled sensitively to maintain the dignity and safety of all concerned. Staff should be aware that in such circumstances, there is a high risk that words or actions may be misinterpreted and that allegations could be made against Staff. They should therefore ensure that their own behaviour is above reproach. A member of Staff who becomes aware that a Child or may be infatuated with him/ her or with a colleague, should discuss this at the earliest opportunity with the Head of Safeguarding.
Domestic Violence	Domestic Violence is any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged sixteen or over, who are or have been intimate with partners or family members regardless of gender or sexuality. This can encompass, but is not limited to psychological, physical, sexual, financial, emotional abuse and so called 'honour' based violence.

MAINTAINING PROFESSIONAL BOUNDARIES

Working with Children and young people may involve physical contact, such as medical intervention, responding to success or distress, preventing an injury or accident, sporting skills instruction or demonstrating the safe use of a piece of equipment. There may be some roles where physical contact is commonplace and/ or a requirement of the role, particularly in sports science or medicine. These tasks should only be undertaken by properly trained and qualified practitioners. This Policy does not seek to replace the specific guidance and codes of practice developed for those professionals.

Children and Adults at Risk are always entitled to respect and privacy, particularly when in a state of undress, changing clothes, showering or undertaking any form of personal care. Staff should not assist with personal care tasks that can be undertaken independently. All supervision measures should be transparent, consistently applied and appropriate to the needs, age and capacity of those concerned. All such measures should also be pre-agreed and recorded.

Allowing or encouraging a relationship to develop in a way which might lead to a sexual relationship is unacceptable. Sexual activity does not just constitute physical contact. It may also include non-contact activities, such as causing Children to engage in or watch sexual activity or producing pornographic material. Engaging in sexual contact or an intimate relationship with a child with whom a member of Staff comes into contact through their role (whatever the circumstances) will be considered to be a breach of trust, leading to a referral to the appropriate statutory and football authorities. In all circumstances where a Child initiates inappropriate contact, it is the responsibility of the member of Staff to sensitively deter them and help them understand the importance of personal boundaries. Should inappropriate contact be initiated by a Child at Risk, then it must be recorded and reported to the Head of Safeguarding. In addition, if a member of Staff believes their own actions could be misinterpreted or if an action is observed by another member of Staff and considered to be inappropriate or possibly abusive, the incident and circumstances should also be recorded and reported.

COMMUNICATION

Communication with children, by whatever method, should take place within professional boundaries. This includes the wider use of technology, for example, mobile phones, emails and social media. This means that staff should:

- Never share any personal information and should not request any personal information from Children.
- Be circumspect in their communications with and about Children to avoid any possible misinterpretation of their motives or behaviour.
- Only contact children for professional reasons and with the agreement and knowledge of BFC and BFCitC.

KEY CONSIDERATIONS:

- Sleeping arrangements in accommodation, all rooms should be on the same floor with staff rooms located either end and clearly identified.
- Experience and suitability of the Staff involved.
- Assessing the suitability of partners and service providers and the adequacy of their safeguarding and safer recruitment policies and practice.
- Ensuring that contractual agreements outline respective safeguarding responsibilities.
- Health, safety and safeguarding risks should be identified and mitigated. Pre-activity and dynamic risk assessments should be undertaken for all activities.
- Safe travel and transport arrangements.
- Ensuring that accommodation is in a safe location, is safely managed and is of good standard for security, hygiene and first aid.
- Emergency response procedures covering injury, illness, emergency evacuation, safeguarding concerns, missing persons, local services and emergency contacts including emergency consular assistance details when abroad.
- Ensuring that there is adequate insurance cover in place.
- Consent for participation, emergency medical treatment and the use of images/footage.
- Appropriate supervision arrangements and ratios.
- Ensuring that additional vulnerability and needs are carefully considered.
- Codes of conduct for Children, Staff and spectators.
- Procedures for dealing with challenging behaviour and bullying.
- Security and measures to manage the behaviour of spectators.
- Safe dispersal procedures.

This list is not exhaustive. The Head of Safeguarding must be given an opportunity to review and approve the safeguarding arrangements for all activities prior to delivery.

SUPERVISION AND RATIOS

Staff are always expected to provide appropriate supervision of the Children in their care. The level of supervision required will vary between activities. Ratios for each activity should be determined by taking the following into consideration:

- The age, needs, abilities and behaviour of the Children participating.
- The competence and experience of Staff involved.
- The nature and duration of the activity.
- Risk assessments and/or intelligence identifying potential behavioural or other issues and risks.

LONE WORKING AND ONE-TO ONE SITUATIONS

A lone worker, for the purpose of this Policy, is defined as a member of Staff who is engaged in activities which place them in a situation without direct contact with other Staff or without direct supervision.

Lone working and one-to-one situations with children require additional and specific safeguards to be in place, as they have the potential to make children more at risk of harm by those who seek to exploit their position of trust.

Under no circumstances should Staff visit children in their homes outside agreed work arrangements. Nor should they invite children to their own home or to that of a family member, colleague or friend. Contact by whatever means and meetings with children outside agreed working arrangements should not take place without the agreement of BFC or BFCitC and in the case of a child, they should not take place without a parent/guardian being present. The Head of Safeguarding should be consulted in all such instances.

This means that Staff should:

- Ensure that social contact, lone working, and home visits only take place if they are an integral part of their role.
- Adhere to this Policy and any agreed risk management strategies.
- work in an open and transparent way and avoid conduct which could raise concern.

PHOTOGRAPHY AND VIDEO FOOTAGE

Staff should never take, display or distribute images of children without their knowledge or consent (and parental/guardian consent in the case of a child) and without the agreement and knowledge of BFC or BFCitC Management with a reason for intended use.

Photography and video footage of BFC and/or BFCitC staff and/or players including the taking of still photographs, filmed, moving images and video recordings are only to be used for the sole purpose of promoting BFC and BFCitC and/or its charities. This includes posting material on social media sites such as, but not limited to, Twitter, Instagram, Facebook and Linked In.

The use of analyst software such as, but not limited to Hudl, is used for the sole use of BFC and BFCitC in the practice of playing performance and analysis. It cannot be used for any other purpose without express permission from BFC or BFCitC management

INTERVIEWING CHILDREN

Children should only be interviewed to ascertain their account of the circumstances that prompted the enquiry and gather information and their views about decisions that affect them.

Consent: Consent to interview a child needs to be obtained from the person with parental responsibility and/or the child if they are of sufficient age and understanding to make this decision.

Appropriate adult to accompany the Child: A Child should always have an appropriate adult (in addition to the interviewer) to accompany them during interviews. Appropriate adults accompanying Children must be briefed on the neutrality of their role and understand that they should not attempt to influence or interpret responses during the interview process. The appropriate adult cannot be a parent who is estranged from the Child or an individual the Child objects to.

Interviewers: BFC and BFCitC will ensure that only those with enough experience and expertise are appointed to interview Children.

Interviewers must ensure that:

- Interviews remain child centred and in the best interests of the child.
- They adhere to BFC and BFCitC policies, procedures, and guidance.
- Interviews take place in safe and appropriate environments.
- They request permission to record interviews.
- They always maintain professional boundaries.
- Contact by whatever means and meetings with children should never take place without the agreement and knowledge of BFC or BFCitC and the child's parents/guardians.
- They record and report any situation which may place a child at risk, or which may compromise BFC/ BFCitC or his/her own professional standing.
- Information suggesting that children are at risk of harm is immediately reported to the Head of Safeguarding

TRANSPORT

It is inappropriate for staff to offer lifts/transport to children outside their normal working duties. Any occasion where children require transport in an emergency situation or where not to give a lift/provide transport may place them in harm's way, should be recorded and reported to the Head of Safeguarding.

This means that Staff should:

- Only transport children if it is part of their role and responsibilities.
- That they have appropriate insurance to cover them transporting participants/players
- Ensure that they are fit to drive and free from any drugs, alcohol or medicine that is likely to impair their judgement and/or ability to drive.
- Ensure that all arrangements for vehicle, passenger and driver safety are in place, including appropriate licence and insurance documents.
- Be aware that, while they are in their care, the safety and welfare of the child(ren) is their responsibility.
- Ensure that their behaviour and that of passengers is always appropriate.
- Ensure that emergency arrangements are justified, recorded, and reported.

In circumstances where a child needs medication regularly, a health care plan should be established to ensure the safety and protection of children and the Staff who are working with them.

When administering first aid, staff should ensure that another adult is aware of the action being taken wherever possible. Staff should understand the extent and limitations of their role and should recognise when an injury requires more experienced intervention.

Parents/guardians should always be informed when first aid has been administered to their child(ren)

This means that Staff should:

- Always act in the best interests of Children.
- Record any administration of first aid or medication.

GIFTS, REWARDS AND SELECTION

Staff should exercise care when selecting children for activities, privileges or rewards to avoid perceptions of favouritism or unfairness. Methods and criteria for selection should always be transparent and consistently applied. Care should also be taken to ensure that staff do not accept any gift that might be construed as a bribe by others or lead the giver to expect preferential treatment. A separate policy on the receiving of gifts is available through the Staff Handbook

KEEPING YOURSELF SAFE AS A STAFF MEMBER OR VOLUNTEER

Safeguarding applies equally to all staff, volunteers, casual workers, and partner agencies. All individuals are supported to understand and fulfil their responsibilities in protecting children, adults at risk, colleagues, and themselves.

Code of Conduct

All staff are required to read the approved Code of Conduct at the start of their employment. This outlines clear expectations to minimise risk during activities and promote safe, professional conduct.

The Code also supports staff in maintaining appropriate boundaries, avoiding behaviours that could be misinterpreted, and protecting themselves from potential allegations. Adherence to this guidance reinforces the professional standards of both Burnley FC and Burnley FC in the Community.

(Full document available on request)

STAFF ARE EXPECTED TO:

- Familiarise themselves with this policy and mandatory guidance.
- Know who the Head of Safeguarding is and how to contact them.
- Ensure the safety of the children in their care.
- Put the welfare of children first and act in their best interests.
- Ensure that the same professional standards are applied regardless of ethnic origin, colour, nationality, gender reassignment/identify, race, religion or belief, gender, sexual orientation, age or disability.
- Build balanced relationships based on mutual Trust and maintain professional boundaries.
- Ensure any concerns or allegations pertaining to a child's welfare are recorded and acted upon in accordance with this policy.
- Help maintain an ethos and culture whereby colleagues, partners, vulnerable groups and their parents/ carers feel able to articulate any concerns comfortably, safe in the knowledge that effective action will be taken as appropriate.
- Promote an environment where poor practice is challenged and reported.
- Ensure that vulnerable groups are treated with respect, and that their views and wishes are valued.
- Recognise the developmental needs of children and capacity of vulnerable groups.
- Encourage and demonstrate consistently high standards of behaviour and understand the types of behaviour that may call into question their suitability to work with children.
- Be aware that behaviour outside of work time may impact upon their suitability to work with children.
- Be aware that breaches of the law and this policy may result in criminal and/or disciplinary action being taken against them, and may also include an assessment by children's social care.

STAFF SHOULD NEVER:

- Use their position of trust to abuse, influence, intimidate, threaten, coerce, exploit or undermine anyone.
- Use their status and standing to form or promote inappropriate relationships. Professional boundaries must always be maintained (See guidance on Professional Boundaries)
- Carry out their duties whilst under the influence of alcohol, drugs or solvents.
- Engage in any sexual, betting, gambling or related activities or have discussions about such activities in the presence of children, except in a clear educational context and with the knowledge and agreement of Management.
- Must not use BFC equipment to access pornography or access pornography on personal devices whilst on duty
- Access, make or distribute illegal or indecent content or images of Children.
- Have any inappropriate or sexual relationship with a 16/17yr old.

MANAGING BEHAVIOURS OF CHILDREN AND YOUNG PEOPLE

STANDARDS

At Burnley FC and Burnley FC in the Community (BFCitC), we believe that children and young people should enjoy their time at our activities. While creating a fun and positive environment is a priority, this must not come at the expense of the safety or wellbeing of others.

We expect all participants to behave in a manner appropriate to their age, maturity, and any additional vulnerabilities, with consideration also given to the nature of the activity.

Session rules will be clearly agreed with participants before the session begins and will include any consequences for non-compliance. These expectations will also be communicated to parents or legal guardians in advance.

Bullying, abuse, victimisation, or any form of initiation will not be tolerated. Any reports of such behaviour will be taken seriously, fully investigated, and addressed promptly and appropriately.

UNDERSTANDING AND MANAGING BEHAVIOURS

At Burnley FC and Burnley FC in the Community (BFCitC), we recognise that behaviour is often a form of communication, particularly for children and young people who may have experienced trauma or adversity. Understanding this is a vital skill we expect all staff to embrace as part of a trauma-informed approach.

We are committed to creating environments where behaviour is managed with empathy, consistency, and awareness of individual needs. Our comprehensive Behaviour Management Policy and guidance reflect this ethos, and all staff are required to read and agree to these documents upon commencement of their employment.

THESE GUIDELINES CONSIDER THE FOLLOWING:

- Everyone is different and has individual needs.
- Attendees will be supported to develop session codes of conduct and have clear well communicated guidance on expectations when in activities.
- Physical Punishment is never acceptable, distraction, diffusion and other techniques may be used when necessary
- Training will be undertaken with members of staff who struggle to manage challenging behaviour.
- Behaviour can be affected by external factors, home situation, school and this should be considered when managing changes in behaviour.
- Hunger, injury, medical conditions, and medication can affect behaviour, we will be made aware of some of these things during activity registration but must remain vigilant for others.
- Physical intervention will only ever be considered in exceptional circumstances when
- the behaviour presents a risk to either the person or those around them – responses must be reasonable and proportionate according to 'Use of reasonable force' July 2013.

RATIOS AND SUPERVISION OF CHILDREN

BFC and BFCitC ensure that as part of planning or delivering sessions that supervisions ratios are considered and appropriate.

This action is taken to ensure that we:

- minimise any risk to participants. enhance the activity
- reassure parent, carers and children
- provide protection for these responsible on providing some protection for those responsible
- for providing, funding or commissioning the activity in the event of concerns or incidents arising.

KEY CONSIDERATIONS

At Burnley FC and Burnley FC in the Community (BFCitC), we recognise that effective supervision is a critical component of safeguarding. Due to the range of variables present in sessions, we do not apply a 'one size fits all' model. Instead, we adopt a flexible, risk-assessed approach that considers the following factors:

- Age and developmental stage of participants
- Any additional or support needs
- Participants' experience and competence
- The nature and inherent risks of the activity (e.g. higher-risk activities such as swimming or climbing require enhanced supervision)
- The venue environment, including layout, accessibility, and equipment used

Minimum Standards

- All activities will have a minimum of two supervisors present at all times.
- Under-18s, parents, or carers must not be included in supervision ratios. While they may support the session, they are not considered responsible supervisors.
- Supervisors must be appropriately trained, DBS-checked, and aware of their safeguarding responsibilities.

Recommended Ratios

As a guide, we align with NSPCC and Department for Education (DfE) recommendations on supervision ratios for children's activities:

- **Children aged 0–2 years:** 1 adult to 3 children
- **Children aged 2–3 years:** 1 adult to 4 children
- **Children aged 4–8 years:** 1 adult to 6 children
- **Children aged 9–12 years:** 1 adult to 8 children
- **Children aged 13–18 years:** 1 adult to 10 children

These are minimum standards. Ratios may need to be reduced depending on the risk level of the activity, the needs of the group, or the physical environment. A dynamic risk assessment should be undertaken in advance of all sessions to ensure that supervision levels are appropriate and proportionate.

SAFER RECRUITMENT

Recruitment will be in line with CPSU guidance, which states that:

- A clear job and person specification are available as part of the advertisement for the job.
- A full interview will be completed with questions relevant to experience included.
- The offer of contract will be made subject to DBS disclosure relevant to job role.
- 2 references, including one from the previous employer will be sought.
- At least one member of the recruitment panel will have completed Safer Recruitment training in the last 3 years.

The lead person for Safer Recruitment sits within HR however, Safeguarding is a vital part of the process and supports in all aspects where needed.

There is a full Safer recruitment Policy in place which is available via the Staff Handbook or at request.

ONLINE SAFETY AND DIGITAL COMMUNICATION

Burnley FC and Burnley FC in the Community (BFCitC) are committed to ensuring that staff and volunteers communicate safely and appropriately with players, parents, supporters, and the wider public. In line with our safeguarding responsibilities and the Online Safety Act (2023), we will ensure:

- A clear and accessible policy on appropriate use of the internet, email, SMS, and social media platforms.
- Parental consent is obtained before communicating with children or young people via electronic means (e.g. SMS, email, messaging apps).
- Children and young people are educated on online safety, including how to protect themselves on social media.
- Staff are trained to understand both their professional and personal responsibilities when operating online.
- Staff must not share personal contact details (e.g. phone numbers, personal social media accounts, email addresses) with children or young people.
- A zero-tolerance approach is taken to cyberbullying, harassment, or inappropriate online behaviour.
- All club-owned devices and networks are subject to web filtering and usage monitoring; reports are regularly reviewed to identify and address any concerning activity.
- Prompt and proportionate responses are taken in the event of any reported misuse of digital platforms or online behaviour.

We remain vigilant to emerging online risks, including AI-generated content (e.g. deepfakes, impersonation) and harmful digital trends.

Full online safety and digital communications guidance is available on request.

ANTI BULLYING COMMITMENT

Burnley FC and Burnley FC in the Community (BFCitC) are committed to creating safe, inclusive, and respectful environments for all participants. We operate a zero-tolerance approach to all forms of bullying and believe that everyone has the right to be treated with dignity and respect.

We actively encourage staff, volunteers, players, parents, and carers to speak up if they witness or experience bullying. All concerns or incidents will be taken seriously, responded to promptly, and managed in an appropriate and proportionate manner.

Where bullying behaviour is identified, it will be addressed through clear procedures. Those involved will be supported to reflect on their behaviour and understand the impact of their actions, while ensuring the safety and wellbeing of those affected.

Definition of Bullying

Bullying is defined as repeated behaviour that is intended to cause physical or emotional harm. It may include:

- Verbal abuse or threats
- Physical aggression or intimidation
- Name-calling, teasing or mocking
- Social exclusion
- Cyberbullying, including online harassment or harmful messages

Our full **Anti-Bullying Policy** should be read in conjunction with this Safeguarding Policy. It outlines the steps we take to prevent, identify, and respond to bullying in all forms.

PHOTOGRAPHY AND CONSENT

BFC and BFCitC are committed to providing a safe environment for vulnerable groups to participate in football. Our failure to identify children who are looked after, adopted or fleeing domestic violence at risk of harm could result in them having to move to keep them safe.

Essential to this commitment, is to ensure that all necessary steps are taken to protect them from the inappropriate use of photographic images.

BFC AND BFCITC WILL NOT ACCEPT FROM STAFF:

- The inappropriate use, adaptation or copying of images for use on child abuse websites on the internet.
- The identification of children when a photograph is accompanied by significant personal information that will assist a third party in identifying the child in order to avoid the situation where a child can be 'groomed';
- The identification and location of children in inappropriate circumstances.
- Using personal mobile phones during sessions to take photographs.
- Not at any time use pictures taken during sessions on their own personal social media sites, photograph must only be used on official BFC and BFCitC sites.

BFC AND BFCITC WILL ENSURE THEY ARE ALWAYS FOLLOWING GOOD PRACTICE GUIDELINES:

- Using a Consent Form, we will ask for the permission of young people and their carers to take and use their image.
- If a photograph is used, we will avoid naming the person or just use a first name.
- We will NEVER publish personal details (email addresses, telephone numbers, addresses, etc.) of a vulnerable person.
- We will only authorise the use of images of players in suitable dress (Tracksuit, on pitch clothing i.e., T-shirt/ shorts and appropriate safety wear, oft pitch clothing)
- We will try to ensure that images positively reflect the involvement in the activity to promote the best aspects of the sport.
- Include the following statement on our websites: "Further use of any of the images on this site is forbidden".
- We will be clear about how and for how long images will be securely stored.

USE OF PHOTOGRAPHIC FILMING EQUIPMENT AT FOOTBALL EVENTS/ COURSES / SESSIONS BFC AND BFCITC WILL:

- Inform participants and parents that a photographer will attend an event and ensure they consent to both the taking and publication of films or photographs which feature and clearly identify a person (e.g. close ups, small group and team photos);
- Include a general statement about photos of events or matches drawing parent/carers' attention to Ground Regulations 24 and 25:
- Require authorised professional and amateur photographers (e.g. press) to register at an event if they wish to use any photographic equipment, including mobile phones with photographic technology;
- Issue an identification pass to photographers which must always be worn and clearly visible during the event.
- Not allow unsupervised access to children and young people, or one-to-one photo sessions at events.
- Not approve/allow photo sessions outside the events or at a young person's home.
- Act on the concerns of any vulnerable people, parents, carers or legal guardians regarding
- the inappropriate use of photographic equipment following the Club's safeguarding procedures.
- Inform children/young people and their parents/carers if video equipment is to be used as a coaching aid.
- Ensure that any photographic images taken and used will be stored safely.

CONTACT DETAILS

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BFCitC - Safeguarding Manager
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Mel Howarth

Academy Safeguarding
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melaniehowarth@burnleyfc.com

Jess Addicote

Director of Safeguarding

Premier League
Safeguarding@premierleague.com

FA Safeguarding Team
0800 1691863
Safeguarding@TheFA.com

PFA – Professional Footballers Association

0161 2350575
youthadvisory@thepfa.co.uk

Kidscape

0207 730 3300
Advising and supporting parents and children
on a wide variety of subjects

National Bullying Helpline

08452255787

PLCF

info@PLCF.com

NSPCC

For anonymous nationwide advice and
support, 24 hours a day
0808 800 5000
help@nspcc.org.uk

Lancashire County Council Social Services
0300 123 6720 - 24-hour helpline

Tim Booth

Local Authority Designated
Officer (LADO)
01772 536 694
Tim.booth@lancashire.gov.uk

Addaction

0808 1640074

Childline

0800 1111

National Domestic Abuse

Helpline
0808 2000 247

Cyber Abuse

www.ceop.police.uk

Respond

0808 808 0700
Support children with learning
difficulties who have experienced
trauma

Internet Safety advice

www.getsafeonline.org

Whistleblowing Advice NSPCC

0800 028 0285

Sporting Chance (Players only)

0870 2200714

Mental health and addiction support

MIND

0300 123 3393
Mental Health Helpline

Young Minds

0207 3368445
supporting young people with Mental
health issues

Anxiety UK

0844 477 5774

Charity Commission

0300 066 9197

Confidential Anti Terrorist Hotline

0800 789 321

POLICY COMPILED IN LINE WITH:

- Lancashire County Council
- NSPCC - Child Protection in Sport Unit EFL - Rule S recommendations Lancashire Safeguarding Children Board Burnley Children's Social Care
- The Football Association Safeguarding Children in Football guidelines The Children Act 1989 updated 2004
- Working Together to Safeguard Children - 2018 Lancashire Children's Social Care
- The Care Act 2014
- Sexual Offences Act 2003 - updated 2017 to include criminalising sexual communication with a child Safeguarding Vulnerable Groups Act 2006
- Protection of Freedom's Act 2014 Public Interest Disclosure Act 1998
- United Convention of the Rights of a Child 1991 Data Protection Act 1998
- Human Rights Act 1998
- Keeping Children Safe in Education updated 2025 (draft) (full version for release Sept 2025)
- Making Safeguarding Personal 2014 (2018)
- Mental Capacity Act 2005
- Criminal Justice and Courts Act 2015
- Premier League Safeguarding Standards 2025 - 2026

