



# CHILDREN AND YOUNG PEOPLE SAFEGUARDING POLICY AND PROCEDURES

Brighton & Hove Albion Football Club  
Brighton & Hove Albion Women's Football Club  
Brighton & Hove Albion Foundation

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## FOREWORD

This Children and Young People Safeguarding Policy and Procedures reflects Brighton & Hove Albion Football Club's commitment to safeguarding and promoting the wellbeing of children and young people. The Club recognises its moral and legal responsibility to protect all children and young people with whom it works.

This policy is recognised by all senior managers and has been approved by the BHAFC Board of Directors, the BHAWFC Board of Directors and the BHAFC Foundation Board of Trustees.

The safety and wellbeing of children and young people is everyone's responsibility. This policy sets out how we fulfil that responsibility across all areas of the Club's work and ensures that safeguarding is embedded in our culture, processes and practices.



## 2 APPLICATION OF POLICY

This policy applies to Brighton & Hove Albion Football Club (BHAFC), Brighton & Hove Albion Women's Football Club (BHAWFC) and Brighton & Hove Albion Foundation (the "Club"). Where this policy refers to the "Club", all three organisations are included.

This policy applies to all those working with children and young people for or on behalf of the Club:

- Permanent, full-time and part-time staff
- Casual workers
- Agency staff
- Volunteers and interns
- Contractors and consultants
- Loan workers
- Guest speakers and visiting professionals

The policy applies regardless of role or department. Safeguarding is everyone's responsibility.



## 3 SCOPE AND LEGAL FRAMEWORK

### 3.1 Purpose

The Club is committed to safeguarding and ensuring the protection and wellbeing of children and young people. We recognise our moral and legal responsibility to do so.

Our aim is to ensure that best practice safeguarding procedures are embedded in every element of the Club's work to ensure the welfare and wellbeing of all children and young people who engage in activities with the Club.

We believe that all safeguarding is everyone's responsibility. All adults working within the Club have a duty to ensure the welfare of children and young people. Adults who work with children are placed in a position of trust. The Club adopts this policy to ensure we are providing a safe and inclusive environment.

### 3.2 Activities and Locations Covered

Activities undertaken by Club departments at the following locations fall under the remit of this policy:

#### **The American Express Stadium:**

- Men's first team and Boy's academy fixtures
- Women's first team, WU19 and Girl's academy fixtures
- Stewarding and all other matchday activities
- Stadium tours and children's events
- Stadium Superstore
- Junior fan activities
- BHAFC Foundation programmes and activities

#### **The American Express Elite Football Performance Centre and other venues:**

- Men's first team training and Boys' academy training and development centres
- Women's first team training, WU19 and Girls academy training and development centres
- BHAFC Foundation programmes and activities
- Women's and Girls training and competitions
- Educational provision and tutoring
- All medical provision for children and young people under 18
- Academy Host Family provision

#### **Broadfield Stadium, Crawley**

- Women's first team, academy fixtures under-21 fixtures

#### **Freshfield Road Offices and Community Hub**

- BHAFC Foundation programmes and activities

### 3.3 Legal Framework

The Club's Children and Young People Safeguarding Policy and Procedures meet the requirements of:

- The Children Act 1989 and 2004
- Working Together to Safeguard Children 2025
- Keeping Children Safe in Education 2025
- Working Together to Safeguard Football 2014
- The FA Premier League Safeguarding Standards
- The FA Charter Standard Safeguarding Policy and Procedures
- Premier League Charitable Fund's Capability Code of Practice

## 4 EQUALITY, DIVERSITY AND INCLUSION

### 4.1 Statement of Commitment

The Club believes that the safety and wellbeing of children and young people is of the utmost importance. All children and young people have a fundamental and equal right to be protected from harm regardless of:

- Age
- Disability or health condition
- Gender reassignment
- Race or ethnicity
- Religion or belief
- Sex
- Sexual orientation
- Pregnancy or maternity

We acknowledge that some groups of children are potentially at greater risk of harm than others. We are committed to ensuring that safeguarding is culturally sensitive and responsive to the specific needs of all children, particularly those with additional vulnerabilities.

We will:

- Ensure our services are underpinned by equity of opportunity
- Acknowledge, promote and celebrate the value of diversity
- Ensure that equality and diversity are considered across all safeguarding functions
- Challenge any unlawful discrimination, harassment and victimisation
- Provide training that educates and informs staff about their responsibilities regarding equality and diversity
- Ensure training and resources are accessible to all staff, including consideration of language needs, neurodivergence and different learning styles
- Create a thriving environment free from abuse where all children feel safe, valued and included

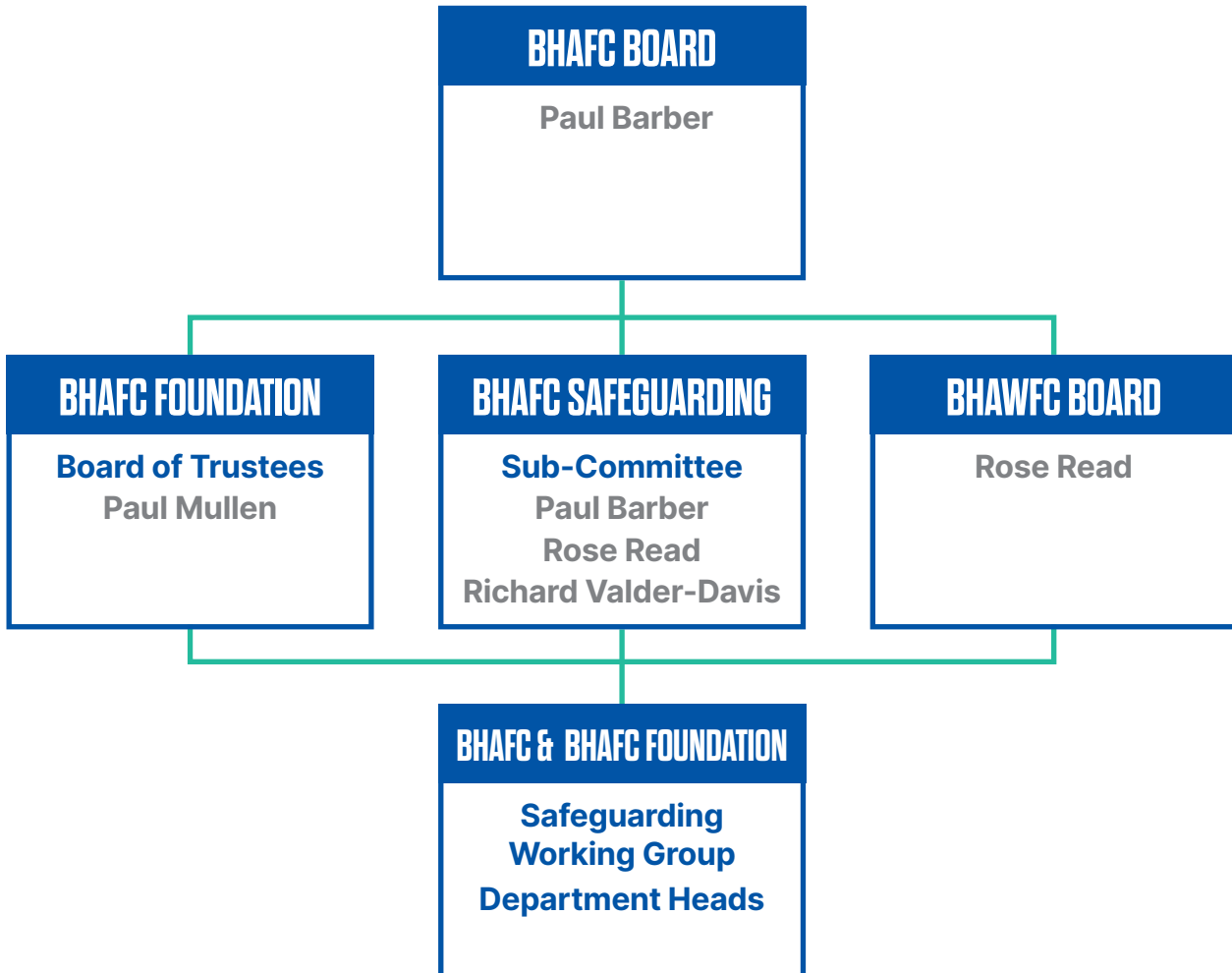


# 5 SAFEGUARDING FRAMEWORK

## 5.1 Roles and Responsibilities

The Club implements a comprehensive safeguarding framework with clear roles and responsibilities. All staff have a responsibility to promote the safety and welfare of children and young people. They should always consider what is in the best interest of the child and maintain an attitude of 'it could happen here' where safeguarding is concerned.

However, specific roles carry designated duties relating to safeguarding.



### 5.1.1 Senior Safeguarding Lead



Deputy Chairman and Chief Executive Officer, Paul Barber, is the Senior Safeguarding Lead for the Club. The Senior Safeguarding Lead:

- Represents safeguarding at the BHAFC Board
- Provides strategic leadership on safeguarding matters
- Ensures governance and accountability for safeguarding across all areas
- Chairs the Safeguarding sub-committee

### 5.1.2 Senior Designated Safeguarding Officer (SDSO)



Chief People & Culture Officer, Rose Read, is the Senior Designated Safeguarding Officer for the Club (BHAFC and BHAWFC). The Club Senior DSO:

- Assists and supports Designated Safeguarding Officers in every department
- Deputies for the Head of Safeguarding
- Provides senior oversight of safeguarding issues
- Ensures consistency in safeguarding practice across the Club



BHAFC Foundation Chief Executive Officer, Joe Jenkins, is the Senior Designated Safeguarding Officer for the Foundation. The Foundation DSO:

- Assists and supports the Foundation DSO
- Champions safeguarding within the Foundation
- Ensures Foundation safeguarding practices align with Club standards

### 5.1.3 Head of Safeguarding and Academy Player Care



Head of Safeguarding and Academy Player Care, Richard Valder-Davis, provides club-wide strategic leadership and management for safeguarding. This role:

- Provides strategic leadership and management of safeguarding across all Club areas
- Ensures all safeguarding concerns are recorded correctly and reported to Senior Leadership
- Ensures referrals are made to appropriate statutory agencies
- Leads on liaison with external agencies including local authorities and police
- Oversees the safeguarding training programme
- Liaises with FA safeguarding and Premier League safeguarding teams
- Supports staff in managing safeguarding concerns

### 5.1.4 Designated Safeguarding Officers (DSO)

There is a Designated Safeguarding Officer within each area of the Club. The DSO:

- Provides support and expert advice on safeguarding matters within their area
- Refers all concerns upwards to the Head of Safeguarding and Senior DSO
- Is the first point of contact for safeguarding concerns and disclosures
- Makes necessary referrals to statutory agencies, FA and Premier League as appropriate
- Ensures all safeguarding reporting systems work effectively
- Participates in multi-agency safeguarding meetings

### 5.1.5 Safer Recruitment Lead



The Club Safer Recruitment Lead is Head of People and Culture, Charlotte Macey. Responsibilities include:

- Overseeing consistent implementation of the Club's safer recruitment policies and procedures
- Ensures robust record keeping across all recruitment activities involving those who work with children
- Maintains oversight of the Single Central Record ensuring that all safer recruitment checks are completed appropriately before individuals begin working with children
- Confirms that safer recruitment training is delivered and refreshed across the organisation
- Ensuring that agency staff and consultants meet the Club's safeguarding standards. The Safer Recruitment Lead works closely with the Head of Safeguarding and Designated Safeguarding Officers to ensure a coordinated approach to preventing unsuitable individuals from working with children

### 5.1.7 Governance and Board Level Oversight

The BHAFC Board, BHAWFC Board and Foundation Board of Trustees maintain strategic oversight of safeguarding.

- The BHAFC board has an independent director as Safeguarding champion
- The BHAFC foundation has an independent trustee as Safeguarding champion

Regular minuted meetings occur between the Board-level Senior Safeguarding Lead and the Head of Safeguarding, and between the Foundation's Safeguarding Trustee and the Foundation Designated Safeguarding Officer.

These meetings take place at least quarterly, with additional meetings scheduled when significant incidents occur, or emerging concerns require Board attention. Safeguarding is a standing agenda item at all Board meetings, ensuring it remains visible at the highest level of the organisation.

The Head of Safeguarding provides regular written reports to the Board detailing safeguarding themes and trends, progress against strategic priorities, summary information about cases managed during the reporting period, identified risks and the controls in place to mitigate them, training compliance rates, and any areas requiring Board-level decision-making or resource allocation. These reports enable the Board to monitor the effectiveness of safeguarding arrangements, identify areas for improvement, and ensure that safeguarding remains embedded in the Club's strategic priorities and daily operations. Similar reporting occurs to the Foundation Board of Trustees in relation to Foundation activities.

### 5.1.7 Governance and Board Level Oversight

Outside of the main club board meeting and trustees meeting but running in line with, is the Safeguarding Sub Committee.

This committee is chaired by the Chief people officer and is in place to ringfence time to talk through the following including, but not exclusive to, individual cases, emerging areas of risk and safer recruitment.

- This committee has present:
- The Clubs senior Safeguarding lead
- The Clubs Chief people officer
- The Clubs Head of Safeguarding

- The Clubs Head of Safety & Security
- The Clubs Chief Operating Officer
- The independent safeguarding champion of the main club board
- The CEO of the Foundation.

### 5.1.9 Safeguarding Risk Working Group

The Safeguarding Risk working group meet quarterly to review Safeguarding risk across the whole organisation. This meeting is chaired by the Head of Safeguarding and the Clubs legal team.



### 5.1.10 Support and Supervision for Safeguarding Staff

The Club recognises that safeguarding roles are emotionally demanding and require proper organisational support. All designated safeguarding staff have access to regular supervision, wellbeing support, and reflective practice opportunities. Supervision sessions occur monthly as a minimum and provide space for safeguarding staff to discuss cases, reflect on practice, identify learning needs, and receive emotional support in managing the impact of safeguarding work. External supervision is available where appropriate, particularly for complex cases or when internal supervision arrangements may be compromised.

Safeguarding staff are allocated sufficient time and resources to fulfil their responsibilities effectively. This includes dedicated time for case management, attendance at multi-agency meetings, liaison with external agencies, training delivery, policy development, and strategic planning. The organisation ensures that safeguarding staff are not expected to undertake these duties alongside full operational workloads that would prevent them from responding appropriately to safeguarding concerns. Senior leadership demonstrates organisational backing for safeguarding decisions and ensures that safeguarding staff have the authority to take necessary action to protect children.

## 5.2 Defining Safeguarding

For the purposes of this policy, safeguarding and promoting the welfare of children and young people means:

- Providing help and support to meet children's needs as soon as problems emerge
- Protecting children from maltreatment, whether within or outside the home, including online
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

Key principles underpinning our safeguarding approach:

- The child's welfare and best interests are paramount
- A child-centred approach is always maintained
- Early intervention and support are provided as soon as problems emerge
- Partnership working with families, other agencies and professionals is essential
- Safeguarding concerns should never be left unaddressed

## 5.3 Young People's Voice and Participation

The Club actively involves young people in safeguarding arrangements. We:

- Seek young people's views on safeguarding policies and practices
- Conduct regular anonymous questionnaires (digital and in-person)
- Use feedback to inform policy updates and improvements
- Involve young people in the policy review process

Young people have expressed a desire for:

- Clear, age-appropriate information on how to report concerns
- More visible safeguarding contacts at the Club
- A culture that encourages and supports speaking up

This feedback is actively incorporated into safeguarding practices to ensure they remain relevant, inclusive and effective.



## 6 SAFER RECRUITMENT AND VETTING

The Club recognises the importance of safer recruitment and has taken into account government guidance in Keeping Children Safe in Education 2025 and The FA's Responsible Recruitment guidelines and the Premier League Club Safer Recruitment Guidance. This ensures a safe and responsible recruitment process for all individuals within the Club who come into contact with children and young people, whether in paid or voluntary positions.

### 6.1 Recruitment Process

The Club's safer recruitment process includes:

- Job adverts and descriptions with clear statements of safeguarding responsibilities
- Safeguarding questions embedded into interviews
- Self-declaration
- Shortlisting by at least two people
- Exploration of any employment gaps or inconsistencies
- Online searches as part of due diligence on shortlisted candidates
- Interview conducted by those who shortlisted
- References obtained and verified before appointment
- Gap analysis
- Right to work



### 6.2 Disclosure and Barring Service Checks

All individuals in regulated activity with children must have an Enhanced DBS (Disclosure and Barring Service) check completed before starting work.

Regulated activity means:

- Teaching, training, care or supervision of children
- Unsupervised activities with children
- Any role that brings someone into regular contact with children

The Club will:

- Process DBS checks efficiently
- Keep DBS checks updated in accordance with FA and Premier League requirements
- Consider any cautions, convictions or information disclosed carefully
- Assess whether a person is suitable for working with children based on the nature of any offences
- Work with the Local Authority Designated Officer (LADO) if concerns arise

If a criminal record check reveals cautions, convictions, community resolutions, warnings or final reprimands, the Club will:

- Consider the nature and circumstances of the offence
- Consider the time elapsed since the offence
- Take into account any rehabilitation or circumstances
- Make a risk assessment based on the activity being undertaken
- Decide on terms of participation or whether the person is suitable for the role

Agency staff must provide evidence of safeguarding training. The Club verifies that all third parties working with children on its behalf have completed a safer recruitment process.

The 'standard' and 'enhanced' criminal record check will show an employer past crimes, even if they're spent. Guidance on what classifies a 'Spent conviction' can be found at [www.gov.uk/exoffenders-and-employment](http://www.gov.uk/exoffenders-and-employment).

The Club will conduct a risk assessment to evaluate the information, and the person may be required to attend a risk assessment meeting with the relevant Designated Safeguarding Officer (DSO) prior to any recruitment decision being made.

If a person is not suitable for a job because of spent conviction or caution, the Club may withdraw a job offer.

### 6.3 Individuals with Criminal Records

Child Protection in Sport Unit (NSPCC) has produced guidance in this area which should be referred to if needed: **Making safe and fair decisions about membership for people with criminal records.**

- Being a participant or fan is not exempt from The Rehabilitation of Offenders Act, meaning it is unlawful to refuse or withdraw membership or to prejudice a participant or fan in any way when a caution or conviction has been spent.
- Whilst there is no requirement to perform checks on all participants and fans, there are occasions when a criminal background may come to light including word of mouth, newspaper or online reporting, through the police or statutory agency or self-disclosure.
- Following information coming to light, the Club will establish whether the conviction is unspent. This can be achieved through a self-declaration form or a face-to-face meeting.
- The Club may also request a basic disclosure from the individual if confirmation of the conviction is required.
- Following confirmation of an unspent offence, the Club may carry out a safeguarding risk assessment based on the activity being attended. Following the risk assessment, a decision will be made about the terms of participation.
- If a spent conviction comes to light, safeguarding should be at the heart of any decision. Any breaches of current Code of Conduct or current behaviours falling short of Club values should be dealt with through normal disciplinary procedures, taking no account of the spent conviction.

## 6.4 References and Pre-Appointment Checks

The Club obtains references before interviews where possible, allowing any concerns to be explored with the referee and taken up with the candidate at interview.

References should:

- Be factual and relevant to the role
- Specifically address safeguarding concerns if any have arisen
- Not be open references
- Be checked for any unexplained gaps

## 6.5 Agency Staff and Consultants

The Club requires all agency staff and consultants working with children to:

- Have a valid Enhanced DBS appropriate to regulated activity
- Sign a self-declaration form
- Declare any criminal history
- Have DBS verification completed through the DBS number and date of issue

## 6.6 Single Central Record

The SCR records all staff, including agency and third party and volunteers working in regulated activity with children and young people. The following information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS check
- A check of professional qualifications, where required
- A check to determine the individuals right to work in the UK
- Additional checks for those who have lived or worked outside of the UK

For agency and third-party staff, the Club will also record whether written confirmation from the employment business supplying the member of staff has been received which indicates that all the necessary checks have been conducted and the date the confirmation was received.

The details of an individual will be removed once they no longer work at the Club.

## 7 INDUCTION AND TRAINING

### 7.1 Mandatory Induction

All individuals newly employed, contracted, or volunteering with the Club who work with or have access to children must complete mandatory safeguarding training as part of their induction process, before they begin work with children where possible.

This applies to:

- Permanent and fixed-term employees
- Casual and agency staff
- Volunteers
- Contractors and supply staff
- Consultants
- Visiting professionals
- Board members and trustees

Induction includes:

#### a) Safeguarding Training Session

A mandatory in-house training covering this policy, procedures, and roles. Training focuses on identifying and reporting safeguarding concerns, with reference to Premier League guidance on safer working practice.

#### b) Policy Documentation

- Copy of Children and Young People Safeguarding Policy and Procedures
- Club's Code of Conduct, Whistleblowing Policy, Complaints Procedures
- Safeguarding contact details and reporting procedures
- One-page quick-reference guide for reporting

#### c) Formal Sign-Off

Staff must sign confirming they have received and understood the policies. The Club ensures understanding through discussion and assessment, not just signature.



## 7.2 Ongoing Training and Development

The Club ensures that all staff undergo regular safeguarding training:

- In-person refresher training: every three years for all core staff
- Annual online refresher training: completed by all staff
- Annual training updates: covering current local and national safeguarding priorities
- Designated Safeguarding Officers: mandatory annual training
- Updated guidance: via email, e-bulletins and staff meetings as issues emerge

The Club recognises the skills and knowledge staff build by undertaking safeguarding training. Staff are encouraged to contribute to and shape safeguarding arrangements. Safeguarding training updates in line with current local and national safeguarding trends and priorities will be provided as part of the Club's ongoing commitment to ensure the protection and welfare of children.

## 7.3 Training Content

The training includes an overview of this policy with specific emphasis on:

- What safeguarding is and why it matters
- The Club's legal and moral responsibilities
- Signs and symptoms of abuse: sexual, physical, emotional, neglect, grooming, online, child-on-child, radicalisation
- Practical advice regarding safeguarding practices in your specific role
- How to deal with a disclosure from a child
- How to report a safeguarding concern (step-by-step procedures)
- Understanding the impact of holding a position of trust
- Examples of good practice and poor practice
- The safeguarding structure at the Club and who to contact
- Ensuring the wellbeing of all people involved in safeguarding
- Applying culturally sensitive approaches to safeguarding
- Using trauma-informed practices (understanding how past harm affects behaviour)

## 7.4 Certification

All Club staff who work with children are expected to maintain current certifications:

- DBS (Disclosure and Barring Service) - valid for 3 years
- FA Safeguarding Certificate - valid for 3 years

The Club tracks expiry dates and reminds staff 3 months before expiry. Renewal is arranged in time to maintain continuous validity. Staff whose certifications expire will not work with children until renewed.

## 7.5 Trauma-Informed Approach

All safeguarding training and practice is delivered using a trauma-informed approach. Staff are trained to:

- Understand the impact of trauma on children's behaviour and development
- Recognise signs of trauma in children
- Respond with sensitivity and empathy to children who have experienced harm
- Avoid re-traumatisation when responding to disclosures
- Support children's recovery and resilience
- Use language that is supportive and non-judgmental

Our culture embeds:

- Culturally sensitive and responsive safeguarding practice
- Understanding of the impact of trauma
- Compassion and support for children who have experienced harm

## 8 CODE OF CONDUCT AND PROFESSIONAL PRACTICE

### 8.1 Good Practice Standards

The following principles are regarded as good practice when working with children. All employees, workers, agency staff and volunteers must adhere to these principles:

- Always act in the best interests of the child
- Treat all children fairly, with respect and dignity
- Maintain professional boundaries
- Communicate clearly and transparently
- Work collaboratively with colleagues, families and other professionals
- Report concerns promptly and follow procedures
- Attend training and keep knowledge up to date
- Challenge inappropriate behaviour and practice

### 8.2 Expected Professional Behaviour

Staff should:

- Be a positive role model for children
- Treat all children with respect regardless of their background
- Maintain confidentiality while following safeguarding procedures
- Foster an environment where children feel safe and valued
- Encourage children to share concerns and report problems
- Never make a child feel ashamed for reporting abuse or concerns
- Never promise a child they will not tell anyone about a disclosure
- Support children affected by safeguarding concerns
- Work with parents and carers in partnership where appropriate
- Attend to their own wellbeing and seek support if needed

### 8.3 Prohibited Conduct

Staff must not:

- Engage in any form of abuse or neglect
- Have inappropriate relationships or contact with children outside their professional role
- Show favouritism or treat children unfairly
- Make disparaging comments about children or families
- Engage with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliate, demean or verbally abuse children
- Physically punish or use excessive force
- Use inappropriate language or behaviour
- Share children's personal information without consent
- Conduct themselves in a way that brings the Club into disrepute

Any staff member who engages in prohibited conduct or breaches the Code of Conduct may be subject to disciplinary action up to and including dismissal.

## 8.4 Use of Technology and Social Media

The Club recognises the positive benefits of technology and social media whilst being aware of safeguarding risks.

Staff must:

- Not add, befriend or follow any child under 18 who is a player or participant on personal social media accounts
- Conduct all communications with under-18s via Club-approved communications applications with embedded parental/guardian oversight (e.g. Teamworks)
- Use Club-issued devices for communications with children
- Keep a record of important communications with children
- Not use personal mobile phones for any contact with children
- Report any online abuse originating from Club activities

Social media use is dealt with in full in the Club's Social Media Policy.

## 8.5 Photography and Filming

Officials who take images will have been briefed by the Safeguarding Team or Media and Communications team.

Consent for images:

- Consent for images will be sought from parents and carers whose children are taking part in Club activity
- Parents and carers are responsible for informing the Club of any changes of circumstances that may affect consent
- Parents and carers will be informed of how the image will be used
- Images will not be used for purposes other than those initially agreed

## 8.6 Codes of Conduct for Parents, Carers and Spectators

The Club has established clear behaviour expectations for parents, carers and spectators who attend Club activities. These expectations recognise that parents and carers play a vital role in creating safe and positive environments for children, and that their conduct significantly impacts the experiences of young people. Parents and carers are expected to treat all children, staff, volunteers and other parents with respect and courtesy at all times.

They should support their children in following Club rules and respecting staff instructions. Parents and carers must not use inappropriate language or display aggressive behaviour on Club premises or at Club activities, recognising that children model the behaviour they observe from adults.

Spectators at events, fixtures, and community programmes are expected to demonstrate positive behaviour and create a welcoming environment. This includes refraining from discriminatory language or behaviour, respecting officials' decisions even when in disagreement, and recognising that children participate in football primarily for enjoyment and development. Spectators should not approach children directly with concerns or complaints but should raise any issues through appropriate channels with staff members.

The Club will address conduct that falls short of these expectations, which may include speaking with individuals about concerns, requesting that they leave events, or in serious cases, preventing future attendance at Club activities. These measures exist to protect children and maintain safe, inclusive environments for all participants.

## 9 IDENTIFYING AND REPORTING CONCERNS

### 9.1 What Staff Should Know

All staff must know the indicators of abuse, neglect and exploitation and show professional curiosity when dealing with children and young people. It is not the responsibility of anyone within the Club to decide whether abuse, neglect or exploitation has taken place.

Irrelevant of the perceived level of seriousness all concerns must be reported and recorded on MyConcern. 'Low-level' concerns such as minor changes in behaviour must be reported as they may be indicative to abuse or neglect.

All staff should:

- Be aware of systems within the Club which support safeguarding
- Know the identity of the Designated Safeguarding Officer in their area must know
- Know what to do if a child tells them they are being abused, neglected or exploited
- Understand that they should never promise a child they will not tell anyone about a report of abuse
- Be able to reassure all victims that they are being taken seriously and will be supported
- Never make a victim feel they are creating a problem by reporting abuse
- Never make a victim feel ashamed for making a report
- Be prepared to identify children who may benefit from early help
- Understand that technology is a significant component in many safeguarding issues

### 9.2 Types of Abuse and Neglect

Abuse is a form of maltreatment of a child and can take many forms and may occur in isolation or in combination. Someone may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Multiple types of abuse often occur together.

#### 9.2.1 Physical Abuse

Physical abuse is when someone hurts or harms a child or young person on purpose. It includes hitting with hand or objects, slapping and punching, kicking, shaking, throwing, poisoning, burning and scalding, biting and scratching, breaking bones, drowning. Physical abuse is any way of intentionally causing physical harm to a child, young person or adult at risk. It also includes making up the symptoms of an illness or causing a child, young person or adult at risk to become unwell.

- Hitting, shaking, throwing, poisoning, burning or scalding
- Drowning, suffocating or otherwise causing physical harm
- Deliberate administration of an inappropriate substance
- Fabrication of symptoms or deliberate induction of illness in a child

Indicators may include:

- Unexplained injuries
- Injuries that do not match the child's account or developmental abilities
- Repeated injuries
- Injuries in protected areas (inner arms, thighs, neck)
- Reluctance to change clothes or shower

#### 9.2.2 Emotional Abuse

Emotional abuse is any type of abuse that involves the continual emotional mistreatment of a child. It's sometimes called psychological abuse. Emotional abuse can involve deliberately

trying to scare, humiliate, isolate or ignore a child. Emotional abuse is often a part of other kinds of abuse, which means it can be difficult to [spot the signs](#) or tell the difference, though it can also happen on its own.

It may involve:

- Conveying to a child that they are worthless or unloved
- Conveying that the child is inadequate or valued only insofar as they meet the needs of another person
- Imposing age or developmentally inappropriate expectations
- Isolation or deprivation of contact with friends or family
- Inappropriate criticism, blame or exposure to frightening events

Indicators may include:

- Low self-esteem and self-confidence
- Excessive compliance or passivity
- Withdrawn or anxious behaviour
- Negative self-talk or self-harm
- Developmental delay

### 9.2.3 Sexual Abuse

Sexual abuse involves forcing, pressurising, tricking or enticing a child, young person or adult at risk to engage in any kind of sexual activity. This could be online or in person and not necessarily involve any of violence<sup>1</sup>

This includes:

- Contact abuse (penetrative or non-penetrative)
- Non-contact activities such as exposure to sexual material or watching sexual acts
- Grooming for sexual exploitation
- Sexual harassment and exploitation

Indicators may include:

- Age-inappropriate sexual behaviour or knowledge
- Discomfort with certain physical activities or body contact
- Sudden changes in behaviour, mood or performance
- Withdrawal or regression
- Reluctance to change or shower

### 9.2.4 Neglect

Neglect is the persistent failure to meet a child's basic needs (physical, emotional or developmental), likely to result in the serious impairment of the child's health or development.

This includes:

- Failure to provide adequate food, clothing, shelter or medical care
- Failure to ensure access to education
- Failure to provide emotional support
- Inadequate supervision for the child's age

Indicators may include:

- Poor hygiene or appearance
- Poor health or untreated medical needs
- Malnutrition or hunger
- Frequent absences from activities
- Developmental delay

## 9.2.5 Exploitation and Trafficking

Child Criminal Exploitation is child abuse where children, young people and adults at risk are manipulated and coerced into committing crimes.

Exploitation involves the abuse of power, trust or vulnerability for personal gain.

This includes:

- Sexual exploitation
- Criminal exploitation and county lines activity
- Exploitation through forced labour or servitude
- Human trafficking

## 9.2.6 Online Abuse

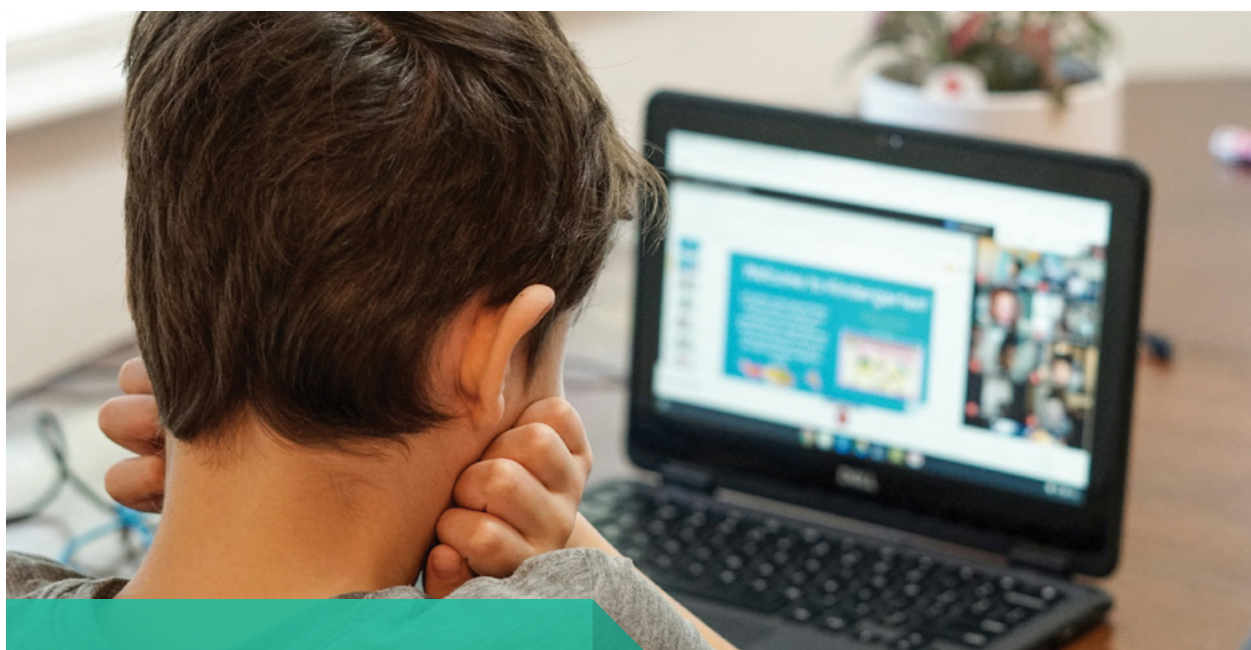
It is essential that children are safeguarded from potentially harmful and inappropriate online material. The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

**Content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

**Contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

**Conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying

**Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel anyone is at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>)



### 9.3 Other Safeguarding Concerns

**Bullying** is repeated, negative behaviour that is intended to make others feel upset, uncomfortable or unsafe.<sup>3</sup> For further guidance on how to deal with bullying & cyberbullying refer to the Anti-Bullying Policy.

**Child-On-child abuse** also referred to as peer-on-peer abuse. It is when children or young people sexually, physically or emotionally abuse another young person. Children and young people may abuse others due to the perceived vulnerabilities or differences of the victim.<sup>4</sup>

**Child Sexual Exploitation** is a type of child sexual abuse. It occurs when an individual or group takes advantage of imbalance of power to coerce, manipulate or deceive a child or young person or adult at risk.<sup>5</sup>

**County Lines** is a term used to describe gangs and organised criminal networks involved exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of “deal line”. They are likely to exploit children, young people and adults at risk to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.<sup>6</sup>

**Cyberbullying** is the repeated, negative use of technology to intentionally hurt others e.g. posting unwanted pictures or messages, accessing another person’s account without permission, creating fake accounts to impersonate or harass someone, and sharing other people’s private information online.<sup>7</sup>

**Grooming** is when someone builds a relationship, trust and emotional connection with a child or young person so they can manipulate, exploit and abuse them.<sup>8</sup>

**Fabricated or induced illness** is a rare form of child abuse. It happens when a parent or carer exaggerates or deliberately causes symptoms of illness in the child.<sup>9</sup>

**Female genital mutilation (FGM)** is a procedure where the female genitals are deliberately cut, injured or changed, but there is no medical reason for this to be done.<sup>10</sup> The Female Genital Mutilation Act (2003) is the UK legislation relating to this offence.

**Forced Marriage** is where one or both people do not or cannot consent to the marriage and pressure or abuse is used to force them into the marriage. It is also when anything is done to make someone marry before they turn 18, even if there is no pressure or abuse.<sup>11</sup>

**Harmful Sexual Behaviour** is sometimes referred to as Problematic sexual behaviour. It is developmentally inappropriate or socially unexpected sexualised behaviour which does not have an overt element of victimisation or abuse.<sup>12</sup>

**Hazing** is any activity expected of someone joining or participating in a group that humiliates, degrades, abuses or endangers them regardless of person’s willingness to participate.<sup>13</sup>

**Poor practice** is the same as low-level concerns. It is behaviours/concerns that falls short of abuse but is nevertheless unacceptable and required action for further guidance on how to respond, record and deal with poor practice refer to our Low-Level Concern Policy.

<sup>1</sup> [Sexual abuse | Childline](#)

<sup>2</sup> [Criminal exploitation and gangs | NSPCC](#)

<sup>3</sup> [Anti-Bullying Pro](#)

<sup>4</sup> [Child-On-Child-Abuse: Signs and Indicators](#)

<sup>5</sup> [Protecting children from sexual exploitation | NSPCC Learning](#)

<sup>6</sup> [County Lines - National Crime Agency](#)

<sup>7</sup> [Anti-Bullying Pro](#)

<sup>8</sup> [What Parents Need to Know About Sexual Grooming | NSPCC](#)

<sup>9</sup> [Overview - Fabricated or induced illness - NHS](#)

<sup>10</sup> [Female genital mutilation \(FGM\) - NHS](#)

<sup>11</sup> [Forced marriage - GOV.UK](#)

<sup>12</sup> [Harmful sexual behaviour \(HSB\) or peer-on-peer sexual abuse | NSPCC Learning](#)

<sup>13</sup> [http://www.stophazing.org/wp-content/uploads/2014/06/hazing\\_in\\_view\\_web1.pdf](http://www.stophazing.org/wp-content/uploads/2014/06/hazing_in_view_web1.pdf)

## 9.4 Receiving a Disclosure

A disclosure is when a child or young person tells someone about abuse, harm or a safeguarding concern they have experienced or witnessed. It could be something that a child or young person deliberately shares or something that comes out less directly e.g. through hints, behavioural changes, or them confiding in a peer.

This is often difficult for a child to make, and children or young people who may be vulnerable are likely to disclose abuse to an adult they trust. It is extremely important that you know how to correctly respond to a disclosure.



### Step 1

Ensure that you deal with the disclosure as it happens and make sure the immediate needs of the child are met and they feel supported. It is not your role to investigate the disclosure when it is made. Instead, it must always be taken seriously and dealt with in accordance with the club's guidance in this Policy. Your role in this situation is only to act in the best interests of the child or young person who may be at risk.

#### To do this, you should:

- Put aside your own feelings and emotions and listen calmly, even if the information is upsetting or shocking.
- Allow the child to speak freely and try not to interrupt them as this may disrupt the discussion and lead them to feel like they are being interrogated.
- Do not worry if there are silences, let the child speak at their own pace and lead the discussion.
- Do not challenge any of the information disclosed by the child.
- Avoid any accusatory or leading questions, let the child tell their own story of events without pushing any information. Do not ask any questions that may make the child feel guilty or ashamed.
- Reassure them that they are doing the right thing and you are taking it seriously.
- If physical abuse has taken place, you may observe any visible marks or bruises, but do not ask a child to remove or adjust clothing to observe them.

- Tell the child who you will be informing of the disclosure whilst emphasising that you will support them through the process.
- Respect the confidentiality of the disclosure by only informing those who need to know. Those who need to know are the people who have a role to play in protecting the child.

### **To do this, you should:**

You should not:

- Document or record the conversation whilst the child is disclosing. This should be done straight away; remember, as accurately as you can, the words and phrases used by the child to describe what has happened.
- Not pass any judgment on what was said or give them the impression that you may blame the child.
- Not make false promises or promises you may not be able to fulfil to the child. For example, a promise that you will not tell anyone.
- Not investigate, avenge or approach the abuser yourself.

Always keep in mind that when a child or younger person discloses, they may feel:

**Guilt:** It is possible they will blame themselves for the abuse and feel guilty about disclosing.

**Ashamed:** They may feel ashamed about the abuse itself or what their friends and family may think.

**Confused:** They may be confused about their feelings for the alleged abuser as it could be someone they look up to and trust.

**Scared:** They may be fearful of the repercussions of disclosing the abuse or alleged abuse.

### **Step 2**

Following the disclosure, if there is an immediate risk of harm, you must call the police to protect the welfare of the child.

If you have not already, as soon as you have ensured the immediate safety and comfort of the child or young person, you must inform a Designated Safeguarding Officer or Head of Safeguarding. Their contact details can be found at Appendix 3.

The Head of Safeguarding or Designated Safeguarding Officer will ensure contact is made with the appropriate statutory agencies on behalf of the Club.

If you are unable to contact the Head of Safeguarding or Designated Safeguarding Officer, there are other useful contacts at Appendix 3 who can provide you with advice. If you were unable to contact the Designated Safeguarding Officer or Head of Safeguarding please inform them of what action was taken as soon as practicably possible.

### **Step 3**

The incident will be recorded using the secure electronic recording platform – MyConcern.

Wherever possible, you must record information as it was told to you using the language of the child or young person rather than your own interpretation of it.

It is important to report factual information rather than assumption, interpretation or opinion. You might convey your intuitive thoughts, but these should be recognised as such and should not form part of the record.

Any original documentation must be passed on to the Designated Safeguarding Officer or Head of Safeguarding to be stored securely.

### **What happens next?**

You should be informed by the Designated Safeguarding Officer or the Head of Safeguarding of what has happened following the report. If you do not receive this information, you should be proactive in seeking it out because it is everyone's responsibility to ensure that concerns

are followed up. If you still have concerns, you should contact the relevant statutory authorities.

If you have a concern that the disclosure has not been appropriately acted upon, you can inform the Head of Safeguarding or alternatively, a Senior Designated Safeguarding Officer. The contact details can be found at Appendix 3.

## 9.6 Responding to Concerning Behaviour from Children

The Club recognises that behaviour is a form of communication and that concerning behaviour from children may indicate underlying needs, distress or experiences of harm. When children display behaviour that falls short of expectations or raises concerns, staff respond in an educational and supportive way that prioritises understanding and meeting needs rather than purely applying sanctions. This trauma-informed approach recognises that many children who engage with the Club, particularly through Foundation community programmes, may have experienced adverse childhood experiences that affect their ability to regulate behaviour and emotions.

Where concerns are raised by a child's behaviour, staff undertake an assessment to determine whether there are factors requiring protective or supportive intervention. This includes considering whether the behaviour might indicate abuse, neglect or exploitation, whether the child has unmet additional needs that the Club could help address, whether external support from agencies might be beneficial, and what adjustments to programme delivery or support might help the child engage more successfully. This assessment involves discussion with designated safeguarding staff and, where appropriate and safe to do so, conversation with the child and their parents or carers to understand their perspective and any underlying circumstances.

Staff work collaboratively with children and families to develop supportive approaches. This might include tailored support within programmes, referral to specialist services, sharing strategies that have worked in other settings, or collaborative work with schools or other agencies already supporting the family. Throughout this process, safeguarding remains the priority, with any concerns about harm requiring appropriate reporting and referral alongside supportive responses. This approach reflects the Club's commitment to creating environments where all children can thrive and where underlying needs are identified and addressed early.

## 9.7 Risk Tracking and Trend Analysis

MyConcern enables effective risk tracking and trend analysis that supports both individual case management and strategic oversight. For individual children, the system maintains a chronology showing all concerns recorded over time, enabling staff to identify patterns, see the full picture of concerns rather than treating each incident in isolation, and spot escalating risks that require more intensive intervention. The system can flag cases where action is outstanding or where review dates are approaching, ensuring that commitments are followed through and that cases receive ongoing attention rather than being closed prematurely.

For organisational oversight, the system enables analysis of trends and patterns across all cases. Designated safeguarding staff and senior leaders can generate reports showing the volume and types of concerns arising across different areas of the Club, identifying whether particular programmes, venues or staff groups are generating more concerns that might indicate need for additional support or training, analysing demographic patterns to identify whether certain groups of children are experiencing particular safeguarding issues, and tracking outcomes of cases to evaluate the effectiveness of responses. This analysis informs the regular reports provided to the Board and Trustees, supports identification of training needs, and enables evidence-based improvement of safeguarding policies and procedures.

## 10 INFORMATION SHARING AND CONFIDENTIALITY

### 10.1 Data Protection and Information Sharing

Data Protection and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the Designated Safeguarding Officer or Head of Safeguarding.

When sharing information, consideration must be given to:

- Whether the information is necessary for the purpose of safeguarding
- Whether it is only shared with those individuals who need to have it
- Whether the information is accurate and up to date
- Whether it is shared in a timely fashion
- Whether it is shared securely
- A record of the decision and rationale (whether to share or not)

### 10.2 When Information Should be Shared

Information about a child should be shared when:

- There are safeguarding or child protection concerns
- A child has a social worker
- A child has been looked after previously
- There are welfare concerns
- This information is required by statutory services
- This is necessary to safeguard a child or others

Information about when a child has a social worker should be used to:

- Support both education and overall wellbeing of the child
- Inform safeguarding decisions
- Promote welfare and educational outcomes

### 10.3 Referrals and External Agencies

Where safeguarding concerns arise, the Club may refer to:

- Local authority children's social care
- The Police
- The Football Association
- Premier League safeguarding teams
- Other football clubs where a trusted safeguarding professional can be identified

Referrals are made when the ongoing risk requires information to be shared to enable risk management and protection of children.

Best practice:

- Obtain the consent of the parent or carer prior to making a referral
- If sharing information with the parent increases risk to the child, consent is not required
- Ensure confidentiality is maintained
- Share information on a strictly need-to-know basis

## 11 ALLEGATIONS AGAINST STAFF

### 11.1 Concerns or allegations that may meet the harm threshold

The nominated person 'Case Manager' will manage cases of concerns and/or allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children within the Club. Any allegation or concern that an employee or volunteer has behaved in a way that has harmed, or may have harmed, a child must be taken seriously and dealt with sensitively and promptly, regardless of where the alleged incident took place.

The threshold is:

- behaved in a way that has harmed a child, or may have harmed a child and/or
- possibly committed a criminal offence against or related to a child, and/or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

The last bullet point above includes behaviour that may have happened outside of the Club, that might make an individual unsuitable to work with children, this is known as transferable risk. Where appropriate, an assessment of transferable risk to children with whom the person works should be undertaken. If in doubt seek advice from the local authority designated officer (LADO).

Depending on the situation, an appropriate response may involve:

- A criminal investigation by the police
- A child protection investigation by the Local Authority in a multi-agency approach
- A disciplinary or misconduct investigation led by the Club (and potentially the FA)

These are not mutually exclusive and may run in parallel.



## 11.2 Investigation and Outcome Process

Where the Club identifies that a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, they should contact local authority children's social care and as appropriate the police immediately.

There are two aspects to consider when an allegation is made:

- Looking after the welfare of the child - the designated safeguarding officer (or a deputy) is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care.
- Investigating and supporting the person subject to the allegation - the case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

When dealing with allegations, the Club should:

- apply common sense and judgement
- deal with allegations quickly, fairly and consistently, and
- provide effective protection for the child and support the person subject to the allegation

The Club should ensure they understand the local authority arrangements for managing allegations, including the contact details and what information the LADO will require when an allegation is made. Before contacting the LADO, the Club should conduct basic enquiries in line with local procedures to establish the facts and to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

For example whether:

- the individual was in the Club at the time of the allegations
- the individual did or could have come into contact with the child
- there were any witnesses, and
- there is any CCTV footage.

The alleged perpetrator will be legally entitled to anonymity until they are either charged with an offence or they waive their anonymity. All employees involved in an investigation or are privy to such information have a legal duty to maintain confidentiality and only provide information to those that need to know.

The employee, worker, consultant, agency staff or volunteer who the allegation concerns will normally be informed as soon as possible after the result of the initial investigation is known.

If it is subsequently established that the allegation was false or malicious, based on further investigation, a written record will be made of the decision detailing the justification for the decision. The person whom the complaint has been made against will normally be informed and the matter will be closed. Allegations that are found to be false or malicious will be removed from personnel records and not referred to in any reference.

Brighton & Hove Child Safeguarding Partnership procedures state in relation to false allegations:

*Such allegations are rare and may be a strong indicator of abuse which requires further exploration. If an allegation is deliberately invented and demonstrably malicious, the employer, in consultation with the Local Authority Designated Officer, they will refer the matter to Children's Social Care to determine whether the child is in need of services or might have been based by others.*

Where a criminal investigation is continued, the person concerned will be suspended on full pay if no reasonable alternative. The reasons and justifications for suspension will be recorded.

If a member of staff is dismissed or resigns in circumstances where they might otherwise have faced dismissal for a safeguarding related reason, the Head of Safeguarding will act in accordance with FA regulations and DBS guidelines and make the necessary referral to the DBS, the FA and the Premier League as appropriate.

The definitions that should be used when the Club determine the outcome of an allegation are set out below:

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence, or
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

### 11.3 Unsubstantiated, unfounded, false or malicious allegations

If an allegation is determined to be unsubstantiated, unfounded, false or malicious, the LADO and the case manager should consider whether the child and/or the person who has made the allegation needs help or may have been abused by someone else and this was a cry for help. In such circumstances, a referral to local authority children's social care may be appropriate.

If an allegation is shown to be deliberately invented or malicious, the Club, should consider whether any disciplinary action is appropriate against the individual who made it.

### 11.4 Record Keeping

Details of allegations following an investigation that are found to have been malicious or false should be removed from personnel records unless the individual gives their consent for retention of the information.

However, for all other allegations, i.e. substantiated, unfounded and unsubstantiated it is important that the following information is kept on the file of the person accused:

- a clear and comprehensive summary of the allegation
- details of how the allegation was followed up and resolved
- a note of any action taken, decisions reached and the outcome i.e. substantiated, unfounded or unsubstantiated
- a copy provided to the person concerned, where agreed by local authority children's social care or the police, and
- a declaration on whether the information will be referred to in any future reference.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time.

All other records should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

The Information Commissioner has published guidance on employment records in its, The Information Commissioner Employment Practices Code<sup>14</sup> which provides some practical advice on record retention.

<sup>14</sup> [The employment practices code](#)

## 11.5 Supporting those involved

The welfare of a child is paramount and this will be the prime concern in terms of investigating an allegation against a person in a position of trust. However, when an allegation or safeguarding concern is being investigated it is likely to be a very stressful experience for the adult subject to the investigation, and potentially for their family members.

It is important that an employer offers appropriate welfare support at such a time and recognises the sensitivity of the situation. Information is confidential and should not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation.

Employers have a duty of care to their employees. They should:

- manage and minimise the stress caused by the allegation
- inform the individual as soon as possible, explaining the likely course of action, guided by the LADO, and the police where necessary
- advise the individual to contact their trade union representative (if applicable), or a colleague for support
- appoint a named representative to keep the person informed about the progress of the case
- provide access to counselling or medical advice where appropriate.
- not prevent social contact with work colleagues and friends, when staff are suspended, unless there is evidence to suggest this may prejudice the gathering of evidence.

Parents or carers of the child or children involved should be formally told about the allegation as soon as possible. The case manager should consult the LADO and where involved, local authority children's social care and/or the police on what information can be disclosed. In deciding what information is disclosed, careful consideration should be given to the provisions of the Data Protection Act 2018, the law of confidence and, where relevant, the Human Rights Act 1998.



## 11.6 Concerns or allegations that do not meet the harm threshold

### 11.6.1 Low-level concerns

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the Club may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to Club policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating children.

Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

It is crucial that all low-level concerns are shared responsibly with the right person and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of the Club from becoming the subject of potential false low-level concerns or misunderstandings.

As part of the whole Clubs approach to safeguarding, we ensure that we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the Club are dealt with promptly and appropriately.

Creating a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should:

- enable the Club to identify inappropriate, problematic or concerning behaviour early
- minimise the risk of abuse, and
- ensure that adults working in or on behalf of the Club are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

### 11.7 Recording low-level concerns

All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

*The Club can decide where these records are kept, but they must be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).*

Records should be reviewed so that potential patterns of inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the Club should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it should be referred to the LADO.

Consideration should also be given to whether there are wider cultural issues within the Club that enabled the behaviour to occur and where appropriate policies could be revised, or extra training delivered to minimise the risk of it happening again.

## 12 SHARING OF NUDE AND SEMI-NUDE IMAGES

All staff should be aware that the consensual and non-consensual sharing of nude and semi-nude images (also known as sexting or youth-produced sexual imagery) is a serious safeguarding concern.

Taking and sharing nude photographs of those under 18 is a criminal offence; however, it is important to recognise that consensual sharing between children of a similar age may require a different response and should not automatically be treated as abusive. Nonetheless, all children must understand that sharing such images is illegal. Non-consensual sharing is both illegal and abusive.

It is an offence to share or threaten to share intimate images, including deepfakes, under the Sexual Offences Act 2003, following amendments that were made by the Online Safety Act 2023.

Any reports of such incidents should be handled sensitively by the Designated Safeguarding Officer, with support provided to victims who should never be made to feel ashamed for coming forward. Staff should be aware that the law exists to protect children and young people rather than to criminalise them. For detailed guidance on managing incidents, refer to UKCIS's *Sharing nudes and semi-nudes: advice for education settings*.<sup>15</sup>



<sup>15</sup>[Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)

## 13 ADDITIONAL NEEDS AND VULNERABILITY

The Club is committed to ensuring that all children and young people, including those with additional needs or experiencing vulnerability, can safely participate in and benefit from Club activities. The Club recognises that some children face circumstances that may increase their vulnerability to harm or mean they require tailored support to engage fully in programmes and activities.

### 13.1 Identifying Additional Needs

The Club implements proactive measures to identify children who may have additional needs or experience vulnerability. This begins at registration, where parents and carers are asked to share relevant information about their child's needs, circumstances or any support requirements. Staff are trained to remain alert to signs that a child may need additional support, including difficulties with communication or interaction, physical or sensory impairments, learning needs, emotional or behavioural difficulties, or signs that suggest challenging circumstances at home. Foundation staff working in communities are particularly alert to indicators of vulnerability such as poverty, homelessness, parental substance misuse, domestic abuse, or involvement with statutory services.

The Club adopts a broad understanding of vulnerability that recognises the complex factors that may affect children. These include family life and experiences, adverse childhood experiences such as abuse, neglect or witnessing violence, involvement with local authority children's services or youth justice systems, the impact of protected characteristics on lived experience including racism, discrimination or hate incidents, learning needs or disabilities, and physical or mental health concerns. Staff understand that vulnerability is not static and may change over time, requiring ongoing attention and review.

### 13.2 Tailored Support and Monitoring

When additional needs or vulnerabilities are identified, the Club ensures that support is tailored, timely and regularly monitored. This begins with understanding the specific needs and circumstances through conversation with the child and their parents or carers where appropriate, and through liaison with other professionals or organisations already supporting the child such as schools, social workers or health professionals. The Club then considers how programmes can be adapted or what additional support can be provided to enable the child to participate safely and enjoyably.

Tailored support might include practical adjustments such as additional supervision, adapted activities or communication methods, providing equipment or resources that enable participation, working with specialist volunteers or coaches who have relevant expertise, arranging for the child to work in smaller groups or with familiar staff, or adjusting timings or locations to reduce barriers to access. It might also include pastoral support such as regular check-ins with a designated member of staff, creating a trusted relationship that enables the child to share concerns, connecting families with relevant services or support in the community, or collaborative working with other agencies to provide coordinated support around the child.

Support is monitored regularly to ensure it remains appropriate and effective. Staff maintain ongoing communication with children and families about how things are going, whether the support is helpful, and whether needs are changing. Where the Club works with other agencies, regular communication ensures that everyone remains aware of the child's current circumstances and that support is coordinated rather than duplicated or contradictory. Monitoring also involves being alert to signs that vulnerability or risk may be escalating, which would require additional action or referral to statutory services.

### 13.3 Record Keeping and Information Sharing

The Club maintains clear and accurate records detailing identified additional needs or vulnerabilities, the support provided, and any engagement or information sharing with external partners. These records are kept securely in MyConcern and are accessible only to those who need them to support the child appropriately.

Records include the initial assessment of needs, support plans detailing what will be provided and by whom, records of regular reviews and monitoring, any communication with parents, carers or external agencies, and any changes to the child's circumstances or support needs over time. This comprehensive record keeping ensures accountability, provides continuity of care if staff change, and enables the Club to demonstrate how it has responded to children's needs. It also provides an evidence base for referrals to external agencies if required, showing what support the Club has already tried and what additional help might be needed.



# 15 SUPERVISION

## 15.1 Supervision Standards

The Club adheres to best practice guidance provided by the FA and NSPCC in relation to supervision of children and young people. The appropriate level of supervision can depend on:

- The activity
- Age of children
- Number of children
- Location of activity
- Individual child needs and vulnerabilities

## 15.2 One-to-One Interactions

One-to-one interactions should:

- Avoid being conducted in secluded areas or behind closed doors
- Be observable and open
- Have visibility to other staff where possible
- Be professionally focused and appropriate
- Be documented and recorded

## 15.3 Changing Facilities

Staff should:

- Not be alone with individual children in changing areas
- Ensure minimum of two adults when supervision of children is required
- Respect child privacy and dignity
- Have a clear policy on who supervises and when



## 16 LOST OR MISSING CHILDREN

Every effort must be made to ensure children and young people remain either with their parents, carers or activity leaders. However, should a child or young person become lost or go missing whilst engaging in Club activity, the Club will make every effort to locate the child as quickly as possible.

**If the child or young person is not located, staff should contact security and/or a member of the safeguarding team. If the child or young person is not located after 10 minutes the Club will contact the child's parents or carers and agree with them to contact the police. If the parents or carers are not available, the Club will call the police directly.**

The Safeguarding Team will be made aware of any instances in which a child or young person goes missing whilst engaging in Club activities including any action taken by the Club and the eventual outcome.

## 17 SEARCHING CHILDREN

To ensure safety and security of all Club activities, children may be subject to search processes.

On matchdays:

- Under-16s can be subject to self-search if stewards have reasonable grounds
- If self-search is unsuccessful and items are suspected, supervisor is called and safeguarding presence should be requested
- Police may be called if necessary

Over 16s:

- Pat-down search procedures by appropriately qualified and vetted stewards

Other Club activities:

- Children may be subject to self-search requests as required

## 18 WHISTLEBLOWING

### 18.1 Raising Concerns About Practice

The Club encourages a culture of openness and one of prevention rather than simply cure. If you have concerns about safeguarding practice or conduct, you should:

- First consult your line manager
- If the matter concerns your line manager, contact the next level senior manager
- Raise concerns with the Head of Safeguarding

### 18.2 Protection for Whistleblowers

The Club has a formal Whistleblowing Policy available to all staff. If you are unable to raise concerns internally:

- Consult the NSPCC Whistleblowing Helpline: 0800 028 0285
- The Academy and the BHAFC Foundation have formal complaints procedures which can be accessed via the Club's and BHAFC Foundation's websites.

## 19 CONTACT DETAILS AND APPENDICES

### 19.1 Brighton & Hove Albion Safeguarding Contacts

**Senior Safeguarding Lead:** Paul Barber  
[safeguarding@brightonandhovealbion.com](mailto:safeguarding@brightonandhovealbion.com)

**Senior Designated Safeguarding Officer:** Rose Read  
[safeguarding@brightonandhovealbion.com](mailto:safeguarding@brightonandhovealbion.com)

**Head of Safeguarding and Academy Player Care:** Richard Valder-Davis  
[safeguarding@brightonandhovealbion.com](mailto:safeguarding@brightonandhovealbion.com) / 07718 437725

**Designated Safeguarding Officer – Elite Performance Centre/Academy:** Rebecca Waller  
[safeguarding@brightonandhovealbion.com](mailto:safeguarding@brightonandhovealbion.com) / 07355 697595

**Designated Safeguarding Officer – Foundation:** Vacancy – Contact Richard Valder-Davis  
[safeguarding@brightonandhovealbion.com](mailto:safeguarding@brightonandhovealbion.com)

**Matchday Safeguarding Lead:** Linda Bond  
[safeguarding@brightonandhovealbion.com](mailto:safeguarding@brightonandhovealbion.com)

### 19.2 External Contacts

**Brighton & Hove Child Safeguarding Partnership:** [Home – BHSCP](#) / 01273 292379

**Local Authority Children’s Services:**

- Brighton & Hove – [Front Door for Families](#)
- West Sussex MASH –  
[Request support/raise a concern - West Sussex County Council](#) / 01403 229900.
- East Sussex SPOA –  
[Contacting the Single Point of Advice \(SPoA\) | East Sussex County Council](#)

**Police:** 101 or 999 (emergency)

**NSPCC:** <https://www.nspcc.org.uk> / 0808 800 5000

**NSPCC Whistleblowing Helpline:** 0800 028 0285

**Childline:** <https://www.childline.org.uk> / 0800 1111

**The Football Association Safeguarding Team:**  
[Section 2 - reporting concerns - Safeguarding | The Football Association](#)

**Premier League Safeguarding Team:**  
[Premier League Safeguarding, Rules & Policy Information](#)

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**Appendix 1:** Definitions of terms used in this policy

**Appendix 2:** Detailed role descriptions

**Appendix 3:** Staff behaviour policy (Code of Conduct)

**Appendix 4:** Legislation and statutory framework

**Appendix 5:** Safer recruitment procedures

**Appendix 6:** Recording and information storage procedures