



CHILDREN AND YOUNG PEOPLE SAFEGUARDING POLICY AND PROCEDURE

Brighton & Hove Albion FC / Brighton & Hove Albion Women's FC / BHAFc Foundation

Updated March 2025

FOREWORD

The Children and Young People Safeguarding Policy and Procedure reflects Brighton and Hove Albion Football Club's commitment to ensuring the safeguarding and protection of children and young people.

This Policy is supported by all senior managers and has been approved by the BHAFC board of directors, the BHAWFC board of directors and the BHAFC Foundation board.



APPLICATION OF POLICY

Where the Policy refers to the 'Club', this encompasses Brighton & Hove Albion Football Club (BHAFC), Brighton & Hove Albion Women's Football Club (BHAWFC) and Brighton & Hove Albion Foundation (BHAFC Foundation).

TABLE OF CONTENTS

04

PURPOSE AND AIMS

05

SCOPE

06

EDI STATEMENT

08

ROLES AND RESPONSIBILITIES

10

SAFER RECRUITMENT

- PARTICIPANTS WITH CRIMINAL RECORDS
- INDUCTION AND TRAINING
- RE-CERTIFICATION

13

EXAMPLES OF WORKING PRACTICES: GOOD PRACTICE

15

EXAMPLES OF WORKING PRACTICES: BAD PRACTICE

17

WHISTLEBLOWING, COMPLAINTS AND REPORTING OF POOR PRACTICE

RISK ASSESSMENTS

SUPERVISION

LOST OR MISSING CHILDREN AND YOUNG PEOPLE

18

SEARCHING CHILDREN AND YOUNG PEOPLE

USE OF PHOTOGRAPHY AND FILM

USE OF TECH AND SOCIAL MEDIA

19

SHARING INFORMATION

20

REFERRALS AND CONFIDENTIALITY

21

RECORDING OF SAFEGUARDING CONCERNS

RECORDING CONCERNS ABOUT ADULT BEHAVIOUR

22

RETENTION PERIODS FOR CHILD RELATED RECORDS

SUPPORT FOR EMPLOYEES

EMPOWER CHILDREN TO BE HEARD

MENTAL HEALTH

23

PROCEDURES

- CONSENT
- WHAT HAPPENS NEXT?
- RAISING A CONCERN

28

REVIEW

PURPOSE AND AIMS

The Club is committed to safeguarding and ensuring the protection of children and young people and recognises its 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 well-being of all children and young people who engage in activities with the Club.

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

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

- The Children Act 1989 & 2004
- Working Together to Safeguard Children 2023
- Working Together to Safeguard Football 2014
- The FA Premier League Safeguarding Standards
- The FA Charter Standard Safeguarding Policy and Procedures
- Keeping Children Safe in Education 2023
- Premier League Charitable Fund's Capability Code of Practice

See Appendix 4 for details of legislation which underpins this policy and procedures.



SCOPE

This Policy applies to all those working with children and young people for or on behalf of the Club. This includes permanent, casual and agency staff, volunteers and contractors regardless of their role.

All the requirements are mandatory and are to be enforced as indicated by the appropriate persons in all cases where there are any suspected instances of poor practice or abuse.

All those working with children and young people for or on behalf of the Club must make themselves aware of the Club's Safeguarding Policy & Procedures and, where appropriate, receive safeguarding training.

Activities undertaken by Club departments at the following locations fall under the remit of this policy. This list is not exhaustive.

AMERICAN EXPRESS STADIUM

- Men's first team and Academy fixtures
- Women's first team and Academy fixtures
- Stewarding and all other matchday activities
- Stadium tours, children's birthday parties
- 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, Academy matches, training and development centres
- Women's first team training, Academy matches, training and development centres
- Educational provision
- All medical provision for children and young people under 18
- Academy Host Family provision
- BHAFC Foundation programmes and activities

BROADFIELD STADIUM, CRAWLEY

- Women's First Team, Academy fixtures and Under-21 fixtures
- BHAFC Under-21 fixtures

FRESHFIELD ROAD OFFICES AND COMMUNITY HUB

- BHAFC Foundation programmes and activities

See Appendix 6 for list of definitions relating to this Policy.

EDI STATEMENT

We believe that the safety and well-being of children and young people is of the utmost importance and that they have a fundamental and equal right to be protected from harm regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation.

We will:

- Ensure our services are underpinned by equity of opportunity;
- Acknowledge, promote, and celebrate the value of diversity;
- Ensure that issues of equality and diversity are considered across the safeguarding function;
- Challenge any unlawful discrimination, harassment and victimisation; and
- Ensure that we have impactful training in place to educate and inform staff around their responsibilities and duties in relation to issues of equality and diversity.

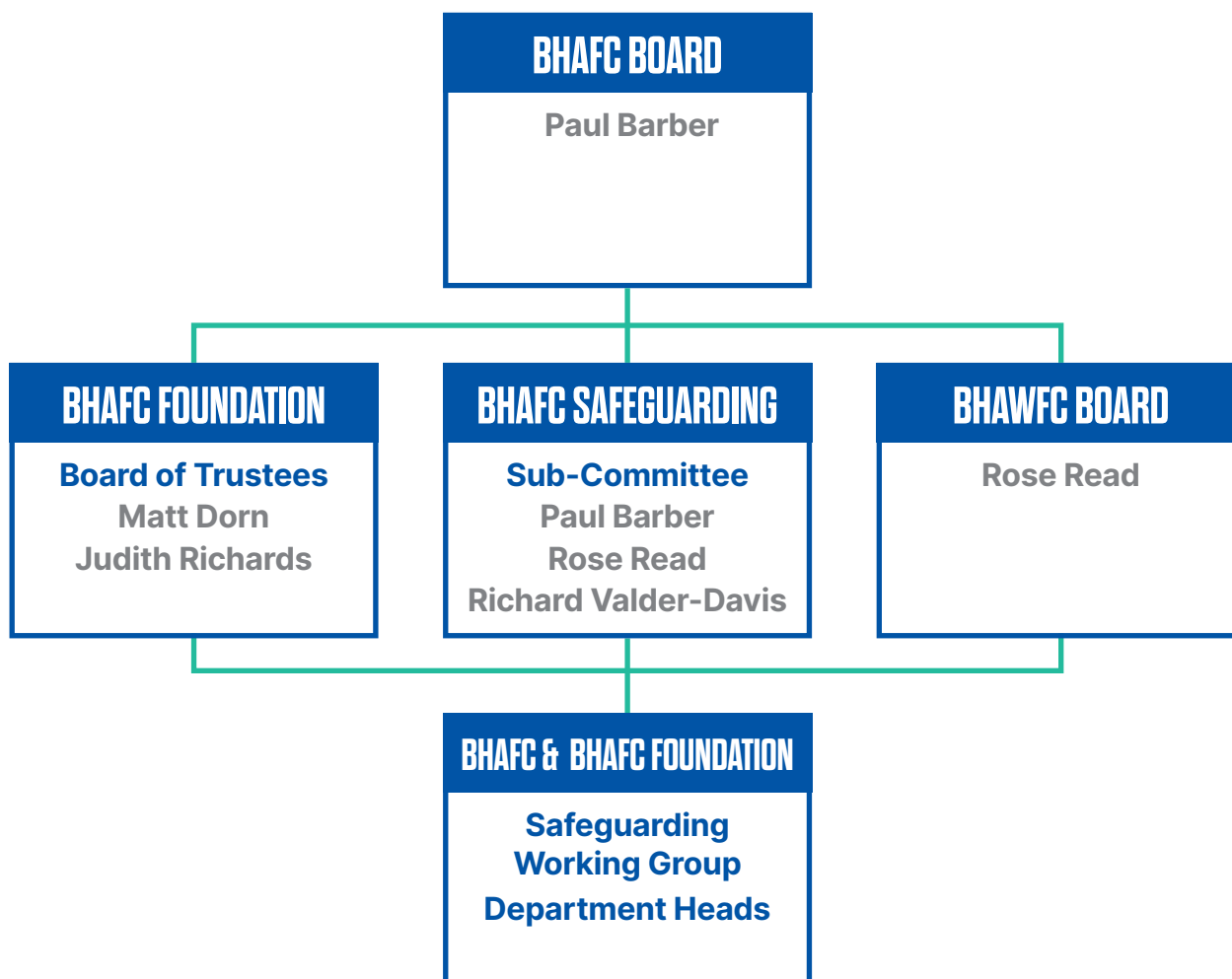


We recognise vulnerable groups, which are often linked with protected characteristics and will support these groups through our safeguarding function. These could include (but are not limited to):

- Children with disabilities
- Children in care
- Children in poverty
- Refugees
- Children in gangs
- Lack of educational engagement
- Looked After Child (LAC)
- Young carers
- Pupils with behaviour and attendance issues

SAFEGUARDING FRAMEWORK

The Club implements a comprehensive framework to ensure the safety and welfare of children and young people. All employees of the Club have a responsibility to promote the safety and welfare of children and young people. However, there are specific roles and specified duties in relation to safeguarding which are set out below.



ROLES AND RESPONSIBILITIES



Paul Barber – Deputy Chairman and Chief Executive Officer

Senior Safeguarding Lead

Paul Barber is the Senior Safeguarding Lead for the Club. As the Senior Safeguarding Lead, Paul is responsible for developing, leading and championing the Safeguarding Framework and overseeing its implementation, ensuring safeguarding is embedded into the Club culture and integrated into all aspects of governance and decision making.



Rose Read – Head of People & Culture

Senior Designated Safeguarding Officer

As Senior Designated Safeguarding Officer (Senior DSO), Rose plays a critical role in fostering a safe and supportive environment, ensuring that Safeguarding is embedded into all people related practices that prioritise the wellbeing and protection of participants and cultivate a culture where safety, inclusivity and respect are at the forefront. Working together with the Senior Safeguarding Lead to align working practices, ensuring compliance with legal and ethical standards.



Matt Dorn – Foundation Chief Executive Officer

Senior Designated Safeguarding Officer BHAFC Foundation

Matt Dorn, is the BHAFC Foundation Senior Designated Safeguarding Officer (Senior DSO) responsible for ensuring that safeguarding is prioritised across our charitable programmes including after school clubs and outreach initiatives. This includes overseeing the implementation of safeguarding policies, ensuring compliance with legal and ethical standards, fostering a culture of safety and inclusion and working closely with stakeholders to ensure vulnerable individuals are protected in all the Foundations activities.



Richard Valder-Davis – Head of Safeguarding and Academy Player Care

Senior Safeguarding Manager

Richard is responsible for developing and implementing safeguarding policies, ensuring compliance with safeguarding standards and practices, identifying and addressing risks, overseeing player welfare and ensuring all staff are trained and equipped to provide a safe environment for all. Richard also heads up our dedicated Safeguarding team, leading our Designated Safeguarding Officers (DSO's) who together are responsible for ensuring the effective delivery of safeguarding practices across the Club, supporting the leadership team in meeting their legal and ethical obligations.

ROLES AND RESPONSIBILITIES

Designated Safeguarding Officers (DSO)

There is a DSO within each area of the Club. Their role is to provide support and refer all issues upwards to the Head of Safeguarding and Senior Designated Safeguarding Officers. The relevant DSO will most often be your first point of contact for any safeguarding concerns or disclosures that arise. Where appropriate, the DSO will make the necessary referrals to the relevant statutory agencies, The FA Case Management Unit and/or the Premier League Safeguarding Team.

The DSOs at the Club are:



Rose Reed



Matt Dorn



Rebecca Waller



Holly Baker



Adrian Morris

- The Senior DSO for BHAFC is Rose Read
- The Senior DSO for BHAFC Foundation is Matt Dorn
- The DSO for the Elite Performance Centre incorporating the Boys and Girls academies is Rebecca Waller
- The DSO for BHAFC Foundation is Holly Baker
- The DSO for matchdays is Adrian Morris

Please see Appendix 2 for a detailed description of the roles and responsibilities of the positions noted above.

The BHAFC Foundation Board of Trustees

The BHAFC Foundation board of trustees is collectively responsible for the oversight of safeguarding at the BHAFC Foundation.

Safeguarding Trustee

BHAFC Foundation has a dedicated Safeguarding Trustee. This role is to provide BHAFC Foundation robust safeguarding governance and be a critical friend to the charity.

Safeguarding Board Member

BHAFC has a dedicated safeguarding board member who is responsible for oversight of safeguarding within the Women's & Girls area of the Club.

Please see Appendix 3 for the contact details of all relevant safeguarding persons within the Club and external contacts that may be of help to you if you have a safeguarding concern.

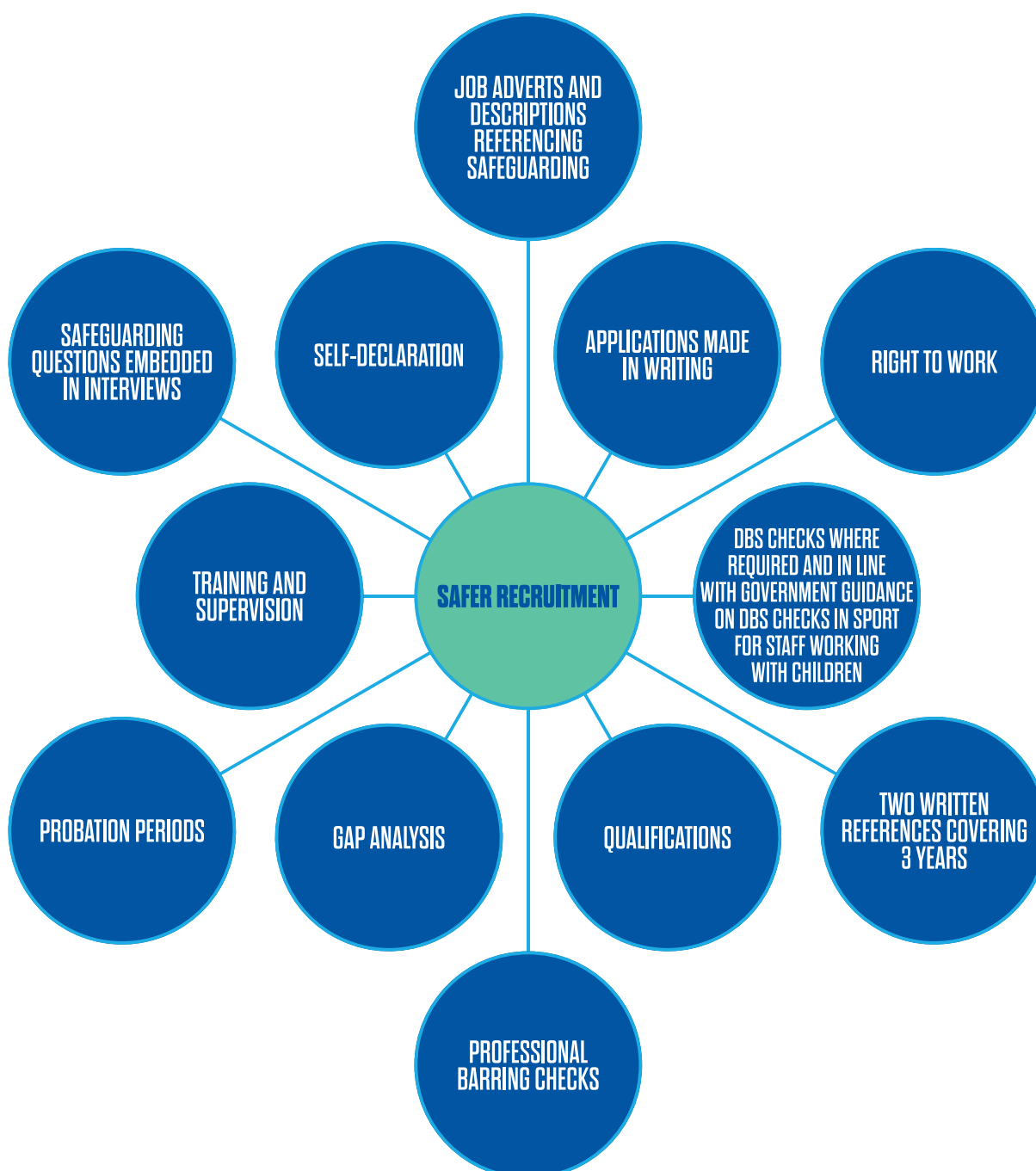
SAFER RECRUITMENT AND SAFEGUARDING TRAINING

The Club recognises the importance of safer recruitment and has taken into account the government guidance in Keeping Children Safe in Education 2023 and The FA's Responsible Recruitment guidelines. This is to ensure there is a safer and responsible recruitment process for all individuals within the Club who come into contact with children and young people and applies to both paid and voluntary positions.

The Club has a duty to carry out due diligence that any third parties working with children or vulnerable adults on behalf of the Club, including but not limited to teachers, interpreters and mental health professionals will also have completed a Safer Recruitment Process.

Specific training is provided to those who deliver safer recruitment.

The Club's safer recruitment process includes:



The Club also requires all agency staff and consultants working with children to sign a self-declaration form. This requires employees to declare any criminal history they may have. Roles this applies to include, but is not limited to:

- Agency teachers
- Agency physios
- Agency interpreters
- Drivers

Consultants and agency staff who undertake a regulated activity with children must have a valid Enhanced DBS. This will need to be verified through the DBS number and date of issue.

If a person's criminal record check reveals cautions, convictions, community resolutions, warnings or final reprimands, the Club will consider the nature of the offence(s) in deciding if the person is unsuitable for working with children and young people.

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.

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.

On occasions, a participant may themselves pose a risk through their criminal past and a risk assessment in relation to the participant may be required.

PARTICIPANTS 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.**

1. 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.
2. 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.
3. 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.
4. The Club may also request a basic disclosure from the individual if confirmation of the conviction is required.
5. 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.

6. In the event that 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.

INDUCTION AND TRAINING

During the induction process, all staff will have mandatory in-house training on identifying and reporting concerns in respect of safeguarding. This training will also incorporate the Premier League guidance for safer working practice. Employees will also receive copies of the Policy and Procedures, along with other Club policies. Staff must sign that they have read and agreed the contents. A refresher face to face safeguarding course will be provided every three years or earlier if required.



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

- The principles and obligation to safeguard within a sporting environment
- An understanding of the signs and symptoms of abuse (sexual, physical, emotional, neglect, grooming, online, child-on-child and radicalisation)
- Practical advice regarding safeguarding practicalities in your role
- Dealing with a disclosure
- How to report a safeguarding concern
- The impact of holding a position of trust and examples of good and bad practice
- The safeguarding structure at the Club
- Ensuring the wellbeing of those involved in matters related to safeguarding issues are supported
- All internal safeguarding will embed a culturally sensitive approach to safeguarding practice.

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.

DSOs will attend mandatory training annually.

RE-CERTIFICATION

It is an expectation of all Club staff who work with children to keep their certificates up to date. All certificates including DBS, The FA Safeguarding and First Aid expire after three years.

TRAINING REFRESHERS

Safeguarding refresher training is to be completed annually online. Every three years, all core staff are required to have in person safeguarding refresher training.

EXAMPLES OF WORKING PRACTICES: GOOD PRACTICE

The following are regarded as good practice when working with children and all employees, workers, agency staff and volunteers must adhere to the following principles when undertaking their work. By doing so, these behaviours become normalised and the risk to children decreases. This list is not exhaustive:

Be a role model, displaying consistently high standards of behaviour and appearance (disciplined/committed/time keeping).

Always use language that is child appropriate and socially acceptable.

Always work in an open environment. You should avoid unnecessary private situations and discourage secrets and/or closed communication.

Make the experience of the sporting activity fun and enjoyable for all involved. In doing this, you should promote the fairness and confront and manage any bullying.

Always put the welfare of the child or young person first.

Treat all children and young people equally and with respect and dignity. All children and young people have the right to be protected from abuse regardless of the presence of any protected characteristics listed by the Equality Act 2010 — sex, gender reassignment, disability, religion or belief, marriage or civil partnership, pregnancy or maternity leave, race, age and sexual orientation.

Avoid unnecessary physical contact and maintain a safe and appropriate distance with children and young people.

Where any form of manual/physical support is required, it should be provided in an open environment and with the consent of the child or young person. Physical contact can be appropriate and, sometimes a necessary part of training. However, it must be neither intrusive nor disturbing and the child or young person's consent must be obtained prior to the contact.

There must always be a qualified first aider present or readily available.

Where supervising groups of children or young people in changing rooms, always ensure staff members work in pairs and appropriate staff to children ratios are in place.

EXAMPLES OF WORKING PRACTICES: GOOD PRACTICE

Written parental consent is required if staff are transporting children and young people or for any significant travel arrangements e.g., tours/overnight stays. Minimum of two members of staff are required for travel arrangements. Staff are not to use their own vehicle. However, if under exceptional circumstances and staff are required to use your own vehicle, staff will obtain written permission from their line manager. The line manager will inform the safeguarding team of this. Staff will also have appropriate business insurance if using their own vehicle.

Whilst at away events, adults should not unnecessarily enter a child or young person's room and they should never invite children or young people into their own room.

Where the Club acts in loco parentis, secure written consent from parents and guardians for the administration of emergency medical treatment and first aid.

When providing feedback to children and young people, make sure it is constructive and encouraging as opposed to negative criticism.

No member of staff should use personal social media accounts to contact a child under 18 or their parent/carer

Ensure that a written record is kept of any safeguarding incidents or injuries that occur. This record should include details of the incident, any action taken, and any treatment given.

Manage the behaviour of all participants in line with Code of Conduct and Club expectations.

EXAMPLES OF WORKING PRACTICES: POOR PRACTICE

WHAT IS A LOW LEVEL CONCERN?

This is poor practice or behaviour where an adult has acted in a way that:

- Is not aligned to the Clubs values or Code of Conduct and can include contact outside of the workplace.
- Does not meet the threshold for abuse and is not serious enough to be referred outside of the Club.

Low level concerns are part of a spectrum of behaviour. This includes:

- Inadvertent or thoughtless behaviour
- Behaviour that may be considered inappropriate depending on the circumstance.
- Behaviour that is intended to enable abuse

POOR PRACTICE WHICH MAY INDICATE A LOW LEVEL CONCERN

The following are regarded as poor practice when working with children and all employees, workers, agency staff and volunteers must avoid such behaviour. These types of behaviours should always be challenged. By not doing so, such behaviour can become normalised and the risk to children increases. This list is not exhaustive:

Taking insufficient care to avoid injuries. For example, by excessive training or inappropriate training for the age, maturity, experience and ability of players.

Allowing children or young people or staff to use inappropriate language or action without being challenged or corrected, for example hazing or bullying.

Ignoring health and safety guidelines as this will subject children to unnecessary risks. [e.g., allowing young players to set up goalposts unsupervised by adults].

Taking a child or young person alone in a car unless written consent has been obtained from the Safeguarding Team in an emergency situation.

Engaging in rough, physical or sexually provocative games of any type, even those which you may consider to be simply 'horseplay' or 'banter'. This is never appropriate and should be avoided.

Spending unnecessary amounts of time alone with children and young people away from others.

EXAMPLES OF WORKING PRACTICES: POOR PRACTICE

Forming unprofessional relationships with parents or carers of participants of the Club.

Encouraging, allowing or engaging in inappropriate touching of any form.

Making sexually suggestive comments to a child or young person.

Taking children or young people to your home or any location where they will be alone with you.

Sharing a room with a child or young person if at an overnight stay or tour.

Being alone in changing rooms, toilet facilities, showers or any private space used by children and young people.

Allowing abusive or concerning practices, allegations or disclosures to go unreported or not acted upon. If you have reported the matter to the relevant person within the Club and it has not been dealt with correctly, consult the procedures in this document.

Doing things of a personal nature that the child or young person can do for themselves.

Giving continued and unnecessary preferential treatment to individuals.

Placing children in potentially compromising and uncomfortable situations with adults (e.g., inappropriate use by a coach/staff member of social media with a young player).

If you are unsure whether you have witnessed poor practice, please raise this with the Safeguarding Team. If in doubt – report.

WHISTLEBLOWING, COMPLAINTS AND REPORTING OF POOR PRACTICE

The Club recognises the risk of things going wrong or unknowingly harbouring poor practice and believes it has a duty to identify such situations and implement measures to mitigate such risks. As such, the Club encourages a culture of openness and one of prevention rather than simply cure.

If you feel there is a requirement to whistle blow, you should first consult your line manager. If the matter concerns your line manager, you should contact the next in line senior manager.

The full Whistleblowing Policy is available for staff under 'Policy Centre' on Core HR. If you are unable to raise concerns internally, please consult the NSPCC Whistleblowing Helpline on 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.

RISK ASSESSMENTS

Risk assessments will always be completed for Club activities. This is to minimise and prevent risks to children and young people. Such risk assessments will consider the particular vulnerabilities or increased risks that may occur when a child is partaking in a Club activity.

Examples of where risk assessments are required are:

- Trips and tours
- Transport
- Changing area
- Host family provision
- Matchday activities

SUPERVISION

The Club adheres to the best practice guidance provided by The FA and NSPCC in relation to the supervision of children and young people when engaging in Club activities. The Club also recognises that the appropriate supervision can depend on the particular activity or children attending. For example, risk identified through age of children, number of children or location of the activity.

LOST OR MISSING CHILDREN AND YOUNG PEOPLE

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.

See Appendix 7 for how this process differs on a matchday.

SEARCHING CHILDREN AND YOUNG PEOPLE

In order to ensure the safety and security of all Club activities, it may be that a child or young person is subjected to the Club's search process.

On a matchday, under 16s can be subject to a self-search if the stewards have reasonable grounds to believe it is necessary. If, after self-search, the stewards have reasonable grounds to believe that the under 16 is concealing something, a Police and Safeguarding representative will be called. The Police would then make the decision as to whether to search the under 16 in question.

Over 16s can be subject to normal search procedures by stewards that are appropriately qualified and vetted without the presence of a Police or Safeguarding representative.

Children and young people attending other Club activities (i.e. training sessions) may be subject to a self-search request.



USE OF PHOTOGRAPHY AND FILM

Officials who take images will have been briefed by a member of the Safeguarding Team or by the Media and Communications team. Consent for images will be sought from parents and carers whose children are taking part in a Club activity.

Parents and carers are responsible for informing the Club of any change of circumstances within the season which may affect consent.

Parents and carers will be informed of how the image will be used. The Club will not allow an image to be used for something other than that for which it was initially agreed.

USE OF TECH AND SOCIAL MEDIA

The Club recognises the positive benefits of the use of social media. However, it is also aware of the potential safeguarding risks of children and young people in engaging with social media platforms.

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

Staff should not add, befriend or follow any child under 18 who is a player or participant.

Reports of any abuse originating from online sources will be pursued and dealt with in line with this Policy.

SHARING INFORMATION

The Club is committed to the sharing of information to protect children, in line with Working Together To Safeguard Children 2023, the Data Protection Act 2018 and General Data Protection Act 2018.

The Club will promote the 'seven golden rules' set out by the government in their guidance (Information Sharing Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers):

1. Remember that General Data Protection Regulation, Data Protection Act 2018 and human rights law 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 individual (and/or the family where appropriate) from the outset about why, what 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 information 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 basis to do so, such as where safety may be at risk. You will need to base your judgement 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.
5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, 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 individuals who need to have it, is accurate and up to date, is shared in a timely fashion, and is shared securely;
7. Keep a record of your decision and the reason 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.

In line with the updated KCSIE September 2023 document, the Club will work with local authorities and encourage sharing of information about when a child has a social worker. The objective when this information is shared with the Club, is to use it to support both education and overall wellbeing of the child when in the Club's care.

REFERRALS AND CONFIDENTIALITY

Where a safeguarding concern about a child or young person arises, the Club may refer these concerns to The FA, statutory, external agencies and other football clubs where a trusted safeguarding professional can be identified.

Referrals onto third parties will be made when the ongoing risk to a person or persons requires information to be shared to enable the risk to be managed effectively.

It is best practice to obtain the consent of the parent or carer prior to making an external referral. If sharing information with the parent or carer increases the risk or potential risk to the child, then consent does not need to be sought.

Every effort will be made to ensure confidentiality is maintained for all concerned. Any information that is shared will be done so on a strictly need to know basis. This includes:

- The relevant person in the Club Safeguarding Team.
- The parent or carer of the child or young person who is alleged to have been abused.
- The person who made the allegation
- If appropriate, statutory agencies, such as the police or Children's Social Services
- If appropriate, external agencies, such as The FA and the Premier League.



“As the face of Safeguarding across the Club I am responsible for ensuring all staff are updated about Safeguarding risk and importantly where to go if they identify a concern. I am also responsible for referring Safeguarding concerns outside of the Club if required.”

- Richard Valder-Davis

RECORDING OF SAFEGUARDING CONCERNS

Safeguarding will result in records being made of concerns. A record of the steps taken to manage concerns as well as record of the outcomes will be made.

The information Commissioners Office 2020 makes it clear that the handling of data containing personal information should be:

- Adequate, relevant and not excessive for the purpose for which they are held.
- Adequate and up to date.
- Only kept for as long as is necessary.

To ensure that any records being made are in line with the General Data Protection Regulation (GDPR) the Club will ensure:

- Records are made for reasons of ongoing safeguarding concerns.
- Retain records for only as long as necessary to ensure that safeguarding of children can occur effectively.
- Destroy records when they are no longer necessary.
- Record safeguarding information in a secure online space which keeps records confidentiality and securely in a separate file for each child. The system used for this is My Concern.

RECORDING CONCERNS ABOUT ADULT BEHAVIOUR

Sometimes concerns might be raised about an adult who works or volunteers with children. This could be because they have:

- Behaved in a way that has harmed, may have harmed, or could harm a child.
- Is under investigation for or committed a criminal offence against, or related to, a child.
- Behaved in a way that indicated they are unsuitable to work with young people.
- Is inconsistent with the staff Code of Conduct, displays poor practice, or acts outside of the Club values. This includes inappropriate conduct outside of work.

If concerns have been raised about an adult's behaviour around children, the records should keep in their personnel file either until they reach the age of 65 or for 10 years – whichever is longer (IRMS, 2016; Department for Education (DfE), 2020).

This applies to volunteers and paid staff. For example, if someone is 60 when the investigation into the allegation is concluded, the Club would keep the records until their 70th birthday. However, if someone is 30 when the investigation into the into the allegation is concluded, the Club would keep the records until they are 65.

Information should be kept for this length of time even if the person stops working or volunteering for the organisation.

Records relating to concerns about an adult's behaviour should be kept in the person's confidential personnel file (not in a central 'concerns log') and a copy should be given to the individual.

RETENTION PERIODS FOR CHILD RELATED RECORDS

Information relating to child protection concerns involving participants of the Club will be kept until the child is 25 years old.

Safeguarding information recorded to enable the safeguarding of a child should be kept until the child leaves the Club ensuring that appropriate information sharing is completed.

SUPPORT FOR EMPLOYEES

The Club recognises that it can be deeply upsetting when a child or young person discloses that they have suffered abuse. The Club has support structures in place to help employees who have received a disclosure or who are being asked to participate in an investigation into poor practice or abuse. If you need further advice regarding this, contact the People & Culture Team or the Head of Safeguarding.

Staff have access to the Club's Employee Assistance Programme where they can access wellbeing support.

EMPOWER CHILDREN TO BE HEARD

Across all areas of the Club there is ongoing commitment to ensure that children continually have their voices, opinions and concern heard.

The Club acknowledges and understand that a child's involvement in elite sport can be a reason a child may not feel comfortable or confident to speak out if there is a problem.

To ensure children have the confidence to speak out about concerns, the Club should always seek the views and opinions of children on topics which involve them, this should include policies, staff recruitment and changes to facilities.

Participant forums across the Club will enable children to have their thoughts and opinions heard.



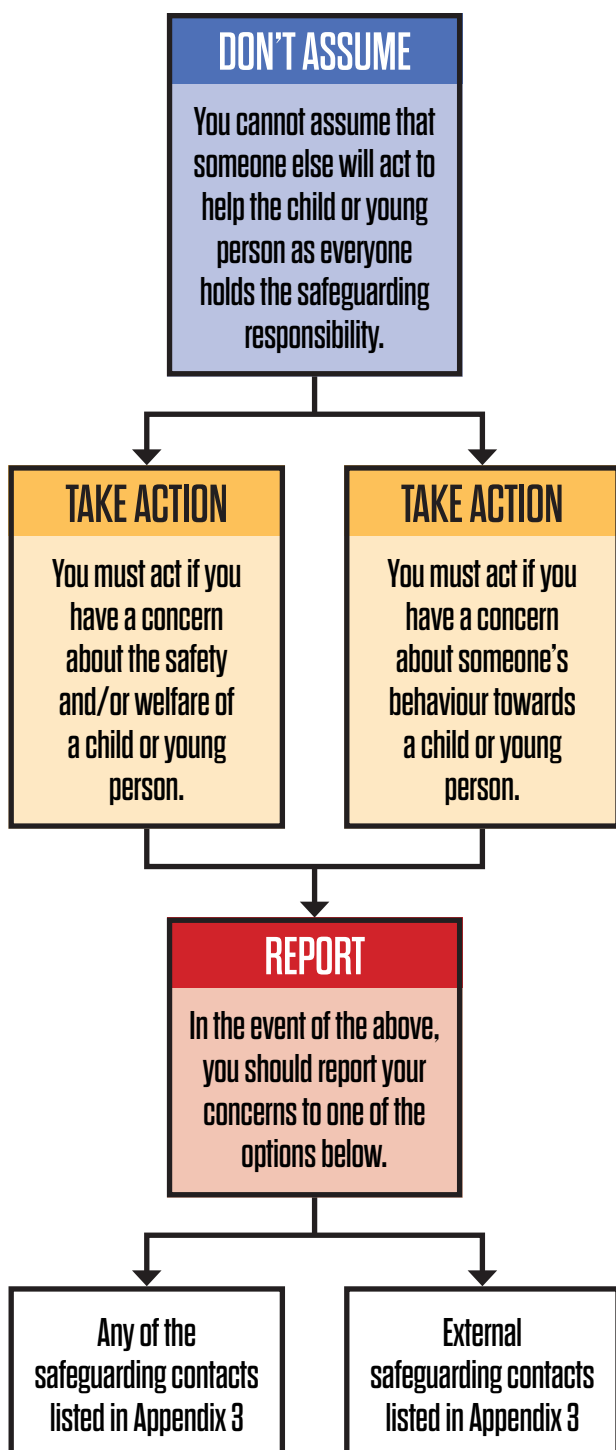
MENTAL HEALTH

The Club is committed to ensuring and promoting the mental health and wellbeing of all players, staff and participants.

The mental health and wellbeing of Players is a key strand within the Academy strategy. The Performance & Wellbeing team are in place and trained to support the wellbeing as well as to look out for signs that may indicate fluctuation in the mental health of players.

PROCEDURES

WHAT ACTION SHOULD YOU TAKE IF YOU SUSPECT ABUSE, POOR PRACTICE OR A LOW LEVEL CONCERN HAS OCCURRED?



SCAN HERE TO **REPORT A SAFEGUARDING CONCERN**

WHAT ACTION SHOULD YOU TAKE IF YOU RECEIVE A SAFEGUARDING DISCLOSURE FROM A CHILD OR YOUNG PERSON?

If a child informs you directly about their concerns about someone's behaviour towards them, this is a disclosure. This is often very 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.

CONSENT

The primary concern in safeguarding should always be the safety and welfare of the child or young person. It is best practice to obtain the consent of the child and parent or carer concerned prior to making an external referral. However, there are several circumstances where a referral may be made without the consent of the child and their parent or carer. These include:

- Where the child or young person is at risk of harm.
- Other people are or may be at risk of harm.
- A serious crime has been committed or by sharing the information the crime can be prevented.
- The child concerned does not have the mental capacity to make the decision to consent to the referral.
- Sharing the information with the emergency services if it is an emergency or life threatening situation.
- An employee, consultant, volunteer, worker or agency staff is implicated.
- The risk of harm meets the threshold for a multi-agency statutory meeting.

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. This is the case even if the truth of the disclosure has not been verified. Your role in this situation is only to act in the best interests of the child or young person who may be at risk.

IN ORDER 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.
- ✓ Try to 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.
- ✓ Tell the child that you recognise how difficult the disclosure may be to them and 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 in order 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.

YOU SHOULD NOT:

- ✗ Document or record the conversation whilst the child is disclosing. This should be done immediately after speaking with the child. 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 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 of the 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 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, 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.

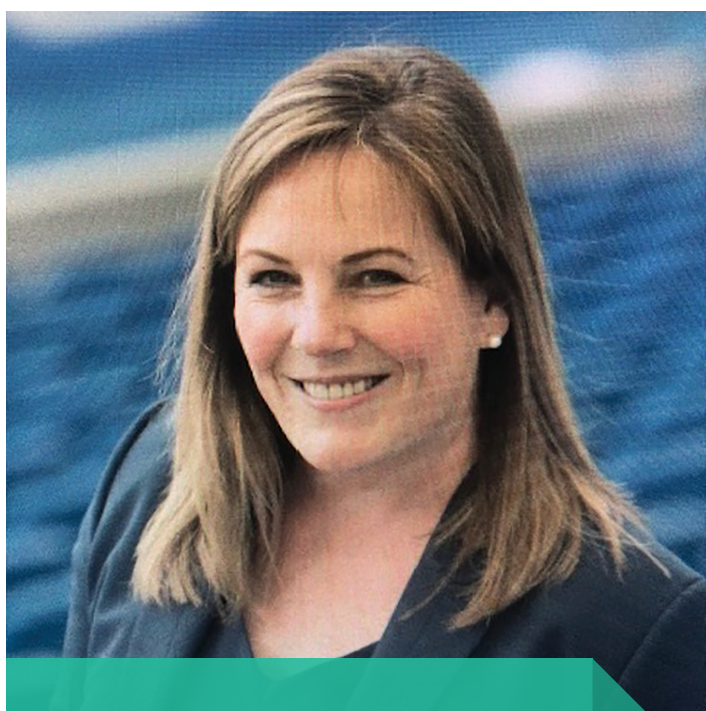
STEP 3

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.

The record of the disclosure must be passed immediately to the Safeguarding Team, digitally if possible, at safeguarding@brightonandhovealbion.com. Any original documentation must be passed to the Head of Safeguarding to be stored securely.



“As the senior DSO (designated safeguarding officer) I champion safeguarding across the club and charity and ensure that our policies and practices are aligned. Working closely with the people and culture team, I oversee all safeguarding matters that arise in the club and charity and ensure that we keep the welfare and safety of children and young people as a core focus of our day to day activities.”

- Rose Reed

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 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. Their contact details can be found at Appendix 3. Ultimately, if you still have concerns, you should contact statutory authorities.

WHAT ACTION SHOULD YOU TAKE WHERE YOU SUSPECT ABUSE BUT THERE HAS BEEN NO DISCLOSURE?

Sometimes a child being abused will not feel able to make a disclosure. It is therefore important to be alert to signs of abuse indicated in Appendix 1. It is still crucial that you raise a concern where something has happened to make you aware of the possibility of a safeguarding issue. For example, an adult or child may say something about themselves or another child that may alert you to a possible abusive situation. Alternatively, you may hear or witness something that gives cause for a safeguarding concern. In such situations, it is still imperative to act.

RAISING A CONCERN

Where you have a concern, but no disclosure, about any form of safeguarding poor practice or abuse, there may not be firm evidence of abuse prior to you raising a concern. When raising a concern, it is important to give as much information as possible and fully explain what exactly has caused you to hold the concern.

First, you should raise the concern with the relevant DSO who will then raise it with the safeguarding team. They will decide the appropriate action in light of the information you have given them.

If you feel unable to raise the concern with the DSO for whatever reason, you can raise it with the Head of Safeguarding.

Following this, if you still think there is a concern, or if you feel the matter is so serious that you are unable to discuss it with the above, you should contact Head of Safeguarding at the Premier League, The FA safeguarding team, the relevant local authority, or Police whose details can be found in Appendix 3.

WHAT HAPPENS WHERE AN ALLEGATION IS MADE AGAINST EMPLOYEES, WORKERS, CONSULTANTS, AGENCY STAFF AND VOLUNTEERS?

If an allegation is made against someone who works within the Club, there are three types of investigation that may occur. They are not mutually exclusive.

1. A criminal investigation by the police.
2. A child protection investigation by the Local Authority in a multi-agency approach;
3. A disciplinary or misconduct investigation led by the Club; this may also involve The FA depending on the role of the alleged abuser.

No internal investigation will commence until the safeguarding team has consulted the Local Authority Designated Officer (LADO).

The alleged abuser 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, on the basis of 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.

In the event that 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.

WHAT HAPPENS WHERE AN ALLEGATION IS MADE AGAINST A CHILD OR YOUNG PERSON?

Any allegation concerning the abuse if a child or young person perpetrated by another child or young person should be dealt with through this Policy and its Procedures. If you have safeguarding concerns or a disclosure that a child or young person has committed abuse, then you should report it immediately to the DSO or Head of Safeguarding who will seek advice from the Local Authority on the matter.

All children involved, whether perpetrator or victim, will be considered as being at risk. A thorough risk assessment of the situation will be conducted with the view to ensuring the safety and best interests of all children involved. Both alleged victim and alleged perpetrator would receive appropriate support. It will also be considered whether the alleged abuser can continue engaging in activities with the Club. This will be decided on the probability of risk to others.



REVIEW

The Club will review this policy to ensure ongoing compliance with safeguarding requirements. This will occur annually, at the end of every season, or whenever there is a change in legislation, guidance, governing body rules or major safeguarding incident.

During the COVID-19 pandemic, the Club altered its safeguarding working processes to reflect the changed environment, not least in respect of lockdowns and remote working. As at the date of this policy, we have returned to work in an effectively “pre-COVID” style of working and some of the amended working practices are no longer of relevance. However, the Club commits to ensure that its working processes are kept under review and can be adapted to ensure that safeguarding is still given primacy were there to be another pandemic, lockdown or similar transformative event.

Richard Valder-Davis and Sarah Byrne are responsible for conducting a review of the Safeguarding Policy on an annual basis or where changes in legislation or significant events prompts an earlier review.

**BHAFC Children and Young People Safeguarding Policy and Procedure:
Updated April 2024**