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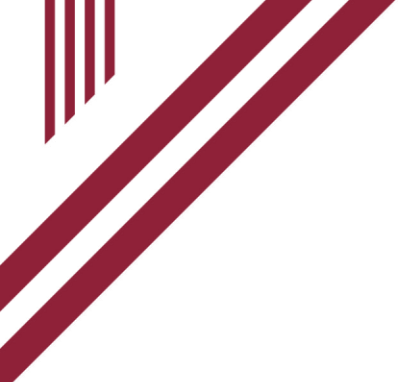
SAFEGUARDING POLICY & PROCEDURES

WEST HAM UNITED (WHFC) & WEST HAM UNITED FOUNDATION (WHF)

2026/27

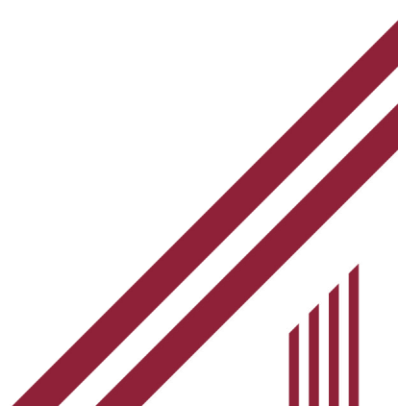
WEST HAM UNITED FOOTBALL CLUB, OLYMPIC PARK, LONDON, E20 2ST, 07801406447

	NAME	DATE	
Approved by	Karim Virani -Club Board Safeguarding Lead Foundation Board of Trustees (WHF)	First Stage: August 2026	
Last reviewed on:	Jackie Ferdinand Director of Safeguarding & Inclusion	July 2026	
Next review due by:	Jackie Ferdinand	August 2027	



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PURPOSE & AIMS



- 1.1 The purpose of West Ham United Football Club & West Ham United Foundation's safeguarding policy is to ensure every adult and child is safe and protected from harm. This means we will always work to:
 - Protect children and adults at risk from abuse, neglect and other forms of harm.
 - Identify children, adults and families who may need help or support.
 - Respond appropriately and without delay when concerns arise.
 - Prevent impairment of children's mental or physical health or development.
 - Promote the welfare and wellbeing of children and adults using our services.
 - Work effectively with relevant statutory agencies and safeguarding partners.
 - 1.2 This policy will give clear direction to staff, volunteers, those in receipt of our services and parents about expected behaviour and our responsibilities to safeguard and promote the welfare of all adults, children and young people.
 - 1.3 West Ham United Football Club & West Ham United Foundation fully recognises the contribution it can make to protecting adults and children from harm and to supporting and promoting the welfare of those coming into contact with our organisation. The elements of our policy are prevention, protection and support.
 - 1.4 This policy applies to all staff, volunteers, trustees, contractors, agency workers, students, consultants and anyone else providing services on behalf of West Ham United Football Club & West Ham United Foundation, as well as those receiving our services where relevant.
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LEGISLATION AND STATUTORY GUIDANCE



This policy is based on the Department for Education's statutory guidance [Working Together to Safeguard Children 2026](#) and the Department of Health and Social Care's [Care and Support Statutory Guidance](#). We comply with the procedures set out by our Local Safeguarding Children Partnership and Safeguarding Adults Board.

This policy is also based on the following legislation/guidance:

- [The Children Act 1989](#) and [Children Act 2004](#), which provide the legal framework for safeguarding and promoting the welfare of children.
- [The Care Act 2014](#), which provides the legal framework for safeguarding adults.
- [The Rehabilitation of Offenders Act 1974](#).
- [The Protection of Freedoms Act 2012](#).
- [The Domestic Abuse Act 2021](#).
- [The Equality Act 2010](#).
- [Mental Capacity Act 2005](#).
- [Sexual Offences Act 2003](#).
- [The Human Rights Act 1998](#).
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#)
- The [Childcare Act 2006](#) and the [Childcare \(Disqualification\) Regulations 2009](#) (where applicable).
- [The Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (where applicable).
- [Information Sharing: Advice for Practitioners Providing Safeguarding Services \(May 2024\)](#).
- [The Counter-Terrorism and Security Act 2015](#).
- [The Crime and Policing Act 2026](#).
- [The Modern Slavery Act 2015](#).
- [The Data Protection Act 2018](#) and [UK General Data Protection Regulation \(UK GDPR\)](#).
- [The London Safeguarding Children procedures](#)

DEFINITIONS



A **child** is anyone who has not yet reached their 18th birthday.

An **adult** is anyone aged 18 or over.

Safeguarding and promoting the welfare of children means:

- providing help and support to meet the needs of children as soon as problems emerge;
- protecting children from maltreatment, whether that is 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;
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the child; and
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

Child protection is part of safeguarding and promoting the welfare of children. It refers to activity undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Safeguarding adults means:

Protecting an adult's right to live in safety, free from abuse and neglect.

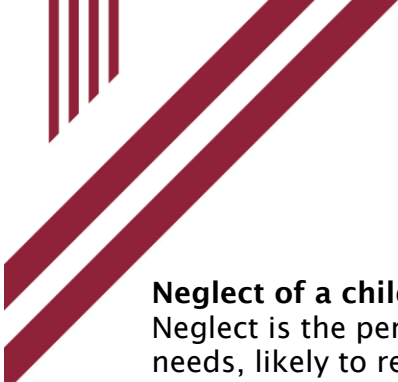
It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action.

Safeguarding practice must recognise that adults may have complex interpersonal relationships and may feel uncertain or ambivalent about their circumstances or about the action they wish to be taken.

For the purposes of this policy, an **adult at risk** is an adult who:

- has needs for care and support, whether or not the Local Authority is meeting any of those needs;
- is experiencing, or is at risk of, abuse or neglect; and
- as a result of those care and support needs, is unable to protect themselves from either the risk of, or experience of, abuse or neglect.

Abuse is a form of maltreatment of a child or adult. Somebody may abuse or neglect an adult or child by inflicting harm, or by failing to act to prevent harm. Adults and children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (including online). They may be abused by an adult or adults, or by another child or children.



Neglect of a child

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example as a result of maternal substance misuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision, including the use of inadequate caregivers; or
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Neglect and acts of omission of an adult

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

Self-neglect

Self-neglect covers a wide range of behaviour involving a failure to care for one's personal hygiene, health or surroundings and may include behaviour such as hoarding.

Physical abuse of a child

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Physical abuse of an adult

This includes hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions.

Sexual abuse of a child

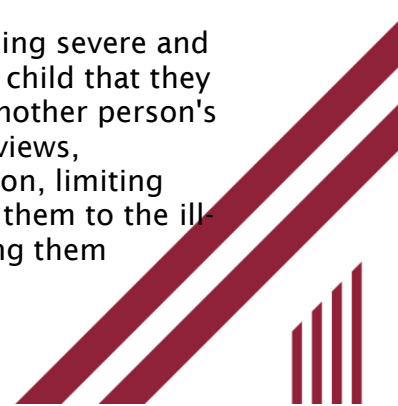
Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. Activities may involve physical contact, including penetrative and non-penetrative acts, or non-contact activities such as involving children in looking at or producing sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse. Sexual abuse can occur online and offline and can be perpetrated by adults or other children.

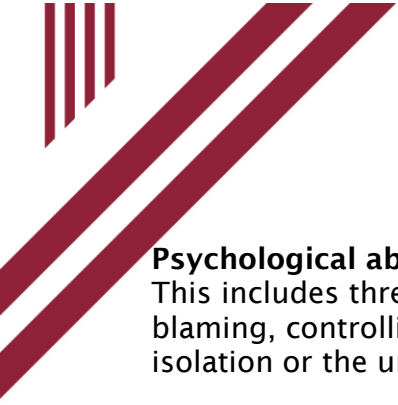
Sexual abuse of an adult

This includes rape, sexual assault, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, being subjected to pornography or made to witness sexual acts, and sexual acts to which the adult has not consented or was pressured into consenting.

Emotional abuse of a child

Emotional abuse is the persistent emotional maltreatment of a child causing severe and adverse effects on emotional development. It may involve conveying to a child that they are worthless, unloved, inadequate or valued only insofar as they meet another person's needs. It may include not giving the child opportunities to express their views, deliberately silencing them, making inappropriate demands, overprotection, limiting exploration and learning, preventing normal social interaction, exposing them to the ill-treatment of another person, serious bullying (including online) or causing them frequently to feel frightened or in danger.





Psychological abuse of an adult

This includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyberbullying, isolation or the unreasonable withdrawal of services or supportive networks.

Exploitation

Exploitation occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or adult into activity which benefits another person. Exploitation may be sexual, criminal, financial, labour-related or otherwise abusive and may occur in person or online.

Modern slavery

Modern slavery encompasses slavery, servitude, forced or compulsory labour and human trafficking. Perpetrators may use coercion, deception, threats or force to subject individuals to exploitation and inhumane treatment.

Mental capacity

Mental capacity refers to a person's ability to make a particular decision at the time it needs to be made. A person must be presumed to have capacity unless it is established, in accordance with the Mental Capacity Act 2005, that they lack capacity in relation to that particular decision. A person must not be treated as unable to make a decision merely because they make a decision that others consider unwise. All practicable steps must be taken to support a person to make their own decision before concluding that they lack capacity.

Organisational abuse

Organisational abuse includes neglect and poor care practice within an institution or care setting, or in relation to care provided in a person's own home. It may range from isolated incidents to ongoing ill-treatment and may arise through neglect, poor professional practice or the organisation's structure, policies, processes or culture.

Discriminatory abuse

Discriminatory abuse includes abuse based on a person's race, sex, disability, age, religion or belief, sexual orientation, gender reassignment or any other protected characteristic. It may include harassment, slurs, unequal treatment or the deliberate denial of services, opportunities or appropriate support.

Financial or material abuse

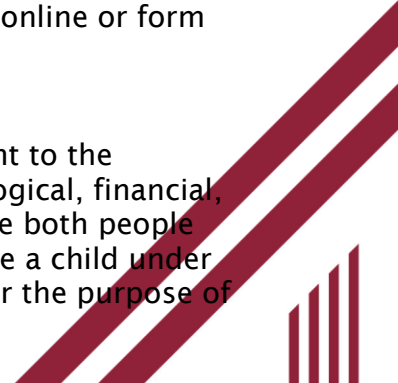
This includes theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

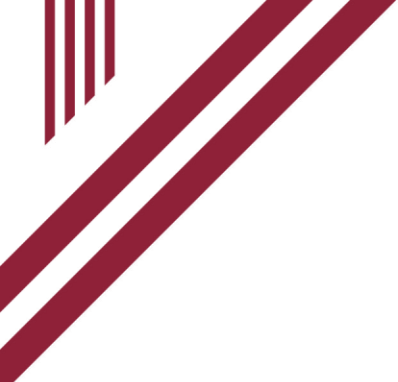
Online abuse

Online abuse is abuse facilitated or perpetrated through digital technology. It may include bullying, harassment, coercive control, grooming, sexual abuse, exploitation, stalking, threats, impersonation, image-based abuse or the sharing of private or sexual information or images without consent. Online abuse may occur entirely online or form part of abuse occurring offline.

Forced marriage

Forced marriage is a marriage in which one or both people do not consent to the marriage but are coerced into it. Coercion may include physical, psychological, financial, sexual or emotional pressure. It differs from an arranged marriage, where both people freely consent. It is a criminal offence to force a person to marry, to cause a child under the age of 18 to marry, or to deceive someone into travelling overseas for the purpose of forced marriage.





Domestic abuse

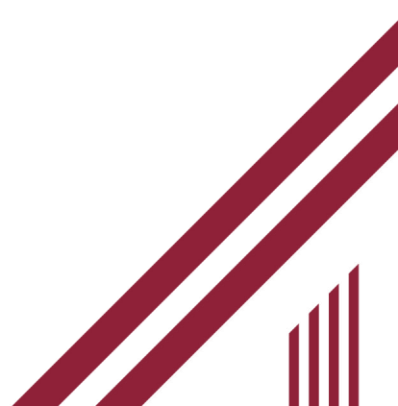
Domestic abuse means abusive behaviour by one person towards another where both people are aged 16 or over and are personally connected. The behaviour may consist of a single incident or a course of conduct and may include physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse or psychological, emotional or other abuse. Children who see, hear or experience the effects of domestic abuse are recognised as victims in their own right.

Radicalisation

Radicalisation is the process through which a person comes to support terrorism or extremist ideologies that can lead to terrorism. A person's susceptibility to radicalisation will depend on their individual circumstances and may be influenced through personal relationships, groups or online activity.

Position of Trust

'Position of trust' is a legal term that refers to certain roles and settings where an adult has regular and direct contact with children. Position of power" over children refers to a **position of trust** where an adult holds authority, influence, or control over a minor (under 18) due to their professional, stakeholder or volunteer role.



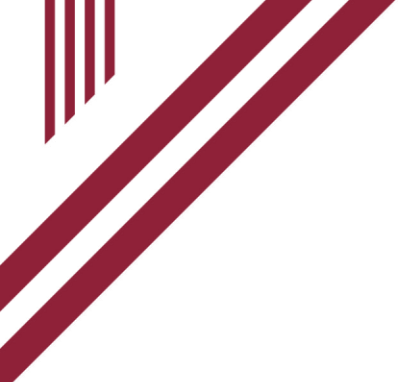
EQUALITY/ EQUITY STATEMENT



4.1 West Ham United Football Club & West Ham United Foundation are committed to providing an inclusive environment where everyone is treated fairly, with dignity and respect. We recognise that some children and adults may be more vulnerable to abuse, neglect or exploitation and that additional barriers may exist to recognising concerns, responding appropriately or disclosing abuse. We are committed to anti-discriminatory practice and will ensure that safeguarding arrangements are inclusive, equitable and responsive to individual needs.

4.2 This may include those who:

- are disabled or have certain health conditions and have specific additional needs
- have Special Educational Needs (whether or not they have a statutory Education, Health and Care plan)
- are experiencing mental health difficulties
- are young carers
- are showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- are missing or absent from education, home or care
- have experienced multiple suspensions, are at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- are at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- are at risk of radicalisation, exploitation or serious violence
- have a parent or carer in custody, or are affected by parental offending
- are in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- are misusing alcohol and other drugs themselves
- are at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- are privately fostered
- have experienced trauma, adverse childhood experiences (ACEs) or significant bereavement
- have English as an additional language (EAL) or communication needs that may affect their ability to seek help or disclose concerns



OUR ETHOS



CHILDREN:

- 5.1 The child's welfare is of paramount importance. West Ham United Football Club will establish and maintain an ethos where children feel secure, are encouraged to talk, are listened to and are safe. Children will be encouraged to speak to any trusted member of staff if they are worried or concerned about something.
- 5.2 Everyone who comes into contact with children and their families has a role to play in safeguarding children. We recognise that staff at West Ham United Football Club play a particularly important role as they are in a position to identify concerns early and provide help for children to prevent concerns from escalating. All staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members must always act in the best interests of the child. We recognise that safeguarding is everyone's responsibility and that effective safeguarding depends upon timely information sharing, professional curiosity and appropriate challenge where concerns remain.
- 5.3 All staff and regular visitors will, through induction and training, know how to recognise emerging needs and indicators of concern, how to respond to a disclosure from a child and how to record and report this information. Staff will never promise confidentiality but will always be honest with children about how information will be shared and why, using language appropriate to their age and understanding. Children will be supported to understand how any safeguarding information they share will be used, who it may need to be shared with and why.
- 5.4 Children and young people have a right to be listened to and to have their views taken seriously. West Ham United Football Club & West Ham United Foundation are committed to creating a culture where children feel safe to express their views and where those views are actively considered when making decisions that affect them, in accordance with their age, understanding and individual circumstances.
- 5.5 We will regularly seek feedback from children and young people about their experiences of our services and use this information to strengthen safeguarding arrangements, improve practice and promote a safe, inclusive and child-centred environment.

ADULTS:

- 5.6 West Ham United Football Club supports the six principles of adult safeguarding as outlined by [The Care Act 2014](#). These principles underpin our safeguarding policy in relation to adults.

Empowerment - People being supported and encouraged to make their own decisions and informed consent.

"I am asked what I want as the outcomes from the safeguarding process and these directly inform what happens."

Prevention - It is better to take action before harm occurs.

"I receive clear and simple information about what abuse is, how to recognise the signs and what I can do to seek help."

Proportionality - The least intrusive response appropriate to the risk presented.

"I am sure that the professionals will work in my interest, as I see them and they will only get involved as much as needed."

Protection - Support and representation for those in greatest need.

"I get help and support to report abuse and neglect. I get help so that I am able to take part in the safeguarding process to the extent to which I want."

Partnership - Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse

"I know that staff treat any personal and sensitive information in confidence, only sharing what is helpful and necessary. I am confident that professionals will work together and with me to get the best result for me."

Accountability - Accountability and transparency in delivering safeguarding. "I understand the role of everyone involved in my life and so do they."

- 5.7 All adults, regardless of age, ability or disability, gender, race, religion, ethnic origin, sexual orientation, marital or gender status have the right to be protected from abuse and poor practice and to participate in an enjoyable and safe environment.
- 5.8 West Ham United Football Club will seek to ensure that we are inclusive and make reasonable adjustments for any ability, disability or impairment, we will also commit to continuous development, monitoring and review.
- 5.9 The rights, dignity and worth of all adults will always be respected.
- 5.10 We recognise that ability and disability can change over time, such that some adults may be additionally vulnerable to abuse, for example those who have a dependency on others or have different communication needs.
- 5.11 We recognise that a disabled adult may or may not identify themselves or be identified as an adult 'at risk'.
- 5.12 We all have a shared responsibility to ensure the safety and well-being of all adults and will act appropriately and report concerns.
- 5.13 At all times we will work in partnership and endeavour to establish effective working relationships with parents, carers and colleagues from other agencies in line with [Working Together to Safeguard Children 2026](#) and the [Care and Support Statutory Guidance](#).

ROLES & RESPONSIBILITIES



ROLES	NAME	CONTACT DETAILS
Designated Safeguarding Lead (DSL)	Jackie Ferdinand	07801406447 jferdinand@westhamunited.co.uk
Club Safeguarding Board Senior Lead	Karim Virani	0208 548 2768
Safeguarding Trustee (Community/Foundation)	Marie Gabriel	marie.gabriel1@nhs.net

6.1 It is the responsibility of every member of staff and regular visitor to ensure that they carry out the requirements of this policy and, at all times, work in a way that will safeguard and promote the welfare of all children and adults at risk. This includes the responsibility to provide a safe environment.

The Senior Lead for Safeguarding

6.2 The Senior Lead for Safeguarding at West Ham United Football Club is accountable for ensuring the effectiveness of this policy and our compliance with it.

6.3 The Senior Lead for Safeguarding will ensure that:

- The safeguarding policy is in place and is reviewed annually, is available to the public and has been written in line with statutory guidance and the procedures of the relevant Local Safeguarding Children Partnership and Safeguarding Adults Board.
- the safeguarding policy is in place, reviewed at appropriate intervals, publicly available and reflects current legislation, statutory guidance and local safeguarding procedures;
- the organisation's safeguarding arrangements reflect current legislation, statutory guidance and local procedures;
- appropriate arrangements are in place to manage concerns about staff, volunteers, contractors and others acting on behalf of the organisation;
- the organisation fulfils any legal duty to make referrals to the Disclosure and Barring Service (DBS);
- recruitment and vetting arrangements are appropriate to the role and regulated activities undertaken;
- safeguarding information is appropriately recorded, retained, transferred and shared;
- an appropriately trained Designated Safeguarding Lead is appointed;
- all staff and volunteers receive safeguarding induction and appropriate safeguarding training relevant to their role;

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- procedures are in place for managing allegations and safeguarding concerns relating to adults working on behalf of the organisation;
 - any weaknesses in safeguarding arrangements are remedied without delay;
 - staff and volunteers follow safeguarding policies and procedures consistently;
 - staff and volunteers feel able to raise safeguarding concerns and that such concerns are taken seriously; and
 - advice is sought from the Local Authority Designated Officer (LADO), or the appropriate Local Authority adult safeguarding service, where safeguarding concerns relating to staff may meet the relevant threshold.

The Designated Safeguarding Lead (DSL)

- 6.4 The Designated Safeguarding Lead is a member of staff who takes lead responsibility for safeguarding and child protection at West Ham United Football Club. The DSL will carry out this role in accordance with this policy, relevant legislation, statutory guidance and local safeguarding procedures.
 - 6.5 The DSL will provide advice, guidance and support to staff and volunteers regarding safeguarding concerns.
 - 6.6 During operational hours, the DSL and/or a deputy DSL (where appointed) will always be available for staff and volunteers to discuss safeguarding concerns. Where they are not physically present, appropriate arrangements will be in place for them to be contacted without delay.
 - 6.7 Following receipt of safeguarding information, the DSL will consider the immediate safety of the child or adult, whether advice or consultation is required, whether early/family help, targeted support or other services are appropriate, whether information should be shared with another agency and whether a referral should be made to Children's Social Care, Adult Social Care, the police or another relevant agency.
 - 6.8 The DSL will ensure that safeguarding records are maintained securely and accurately. Records will include the concern, discussions held, decisions reached, reasons for those decisions, action taken and the outcome where known.
 - 6.9 The DSL is responsible for ensuring that all staff and volunteers are aware of this safeguarding policy, understand the procedures they must follow and receive appropriate safeguarding information as part of their induction.
 - 6.10 The DSL will ensure that safeguarding training needs across the organisation are identified, monitored and refreshed at appropriate intervals.
 - 6.11 The DSL will complete and maintain safeguarding training appropriate to their role and ensure they remain familiar with current legislation, statutory guidance, local safeguarding procedures and referral pathways.
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RECORDS MANAGEMENT AND INFORMATION SHARING



- 7.1 West Ham United Football Club & West Ham United Foundation recognises that the lawful recording, management and sharing of safeguarding information is essential to protecting children and adults at risk. Concerns about confidentiality or data protection must never prevent staff or volunteers from sharing information where doing so is necessary to safeguard a child or adult at risk.
- 7.2 Any member of staff or volunteer who has concerns about the welfare or safety of a child or adult at risk will record those concerns promptly and accurately using West Ham United Football Club & West Ham United Foundation's agreed safeguarding recording procedures. All safeguarding concerns must be reported to the Designated Safeguarding Lead (DSL) without delay.
- 7.3 We will process, store and share personal information in accordance with the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR) and the Government's *Information Sharing: Advice for Practitioners Providing Safeguarding Services* (May 2024).
- 7.4 The Designated Safeguarding Lead (DSL) will consider what safeguarding information needs to be shared, with whom, when and for what purpose. Decisions about information sharing will always place the safety and welfare of the child or adult at risk as the primary consideration.
- 7.5 When deciding whether to share safeguarding information, staff and volunteers should apply the following principles:
- Necessary and proportionate;
 - Relevant;
 - Adequate;
 - Accurate;
 - Timely;
 - Secure; and
 - Recorded.
- 7.6 Staff should be open and honest with children, adults and, where appropriate, parents or carers about how safeguarding information may be used and shared. However, consent is not required where there is another lawful basis for sharing information to safeguard a child or adult at risk, or where seeking consent would place someone at increased risk of harm or prejudice a safeguarding enquiry. The reasons for any decision to share information without consent will be appropriately recorded.
- 7.7 Safeguarding information will only be shared on a need-to-know basis. Concerns relating to the Designated Safeguarding Lead should be reported in accordance with this policy's procedures for reporting safeguarding concerns about senior safeguarding staff.
- 7.8 Safeguarding records will be factual, objective, accurate and contemporaneous, clearly distinguishing between observed facts, information received from others and professional opinion. Where professional judgement has been exercised, the reasons for decisions will be clearly recorded.
- 7.9 Safeguarding records will be maintained securely, whether held electronically or in paper format. Appropriate technical and organisational measures will be used to protect sensitive information, including secure electronic storage, password protection, encryption and multi-factor authentication where appropriate. Access to safeguarding records will be restricted to those who require the information to fulfil their safeguarding responsibilities.

- 7.10 Safeguarding records will be retained securely in accordance with West Ham United Football Club & West Ham United Foundation's Records Retention Schedule, data protection legislation and any applicable statutory requirements.
- 7.11 Records relating to allegations against staff, volunteers or others working on behalf of West Ham United Football Club & West Ham United Foundation will be retained in accordance with current statutory guidance and employment legislation.
- 7.12 The Government's *Information Sharing: Advice for Practitioners Providing Safeguarding Services* (May 2024) sets out the Seven Golden Rules for information sharing. Staff and volunteers who are uncertain whether information should be shared should seek advice from the Designated Safeguarding Lead (or Deputy Designated Safeguarding Lead) without delay.

TRAINING & INDUCTION



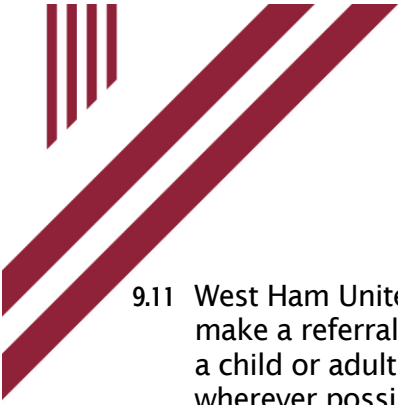
- 8.1 All new staff and volunteers will receive safeguarding information as part of their induction. This will include a copy of this safeguarding policy, details of West Ham United Football Club & West Ham United Foundation's safeguarding procedures, the Staff Code of Conduct, the identity and contact details of the Senior Lead for Safeguarding and the Designated Safeguarding Lead (DSL), and information about how safeguarding concerns should be reported.
- 8.2 Every member of staff and volunteer whose role brings them into contact with children or adults at risk will receive safeguarding training appropriate to their role as part of their induction. This will include recognising abuse and neglect, responding appropriately to disclosures, recording and reporting safeguarding concerns, understanding the role of the Designated Safeguarding Lead, professional curiosity, information sharing, confidentiality and whistleblowing procedures.
- 8.3 Staff and volunteers will also receive guidance about maintaining appropriate professional boundaries and expected standards of conduct. All staff and volunteers are expected to carry out their duties in accordance with West Ham United Football Club & West Ham United Foundation's policies and procedures and understand that failure to do so may result in disciplinary action.
- 8.4 In addition to safeguarding induction, West Ham United Football Club & West Ham United Foundation will ensure that appropriate arrangements are in place to support staff and volunteers in understanding and fulfilling their safeguarding responsibilities. This will include:
 - safeguarding training appropriate to their role;
 - regular safeguarding updates (for example through emails, newsletters, briefings or staff meetings);
 - access to relevant safeguarding policies and procedures;
 - opportunities to seek advice and guidance from the Designated Safeguarding Lead; and
 - additional safeguarding training where changes in legislation, statutory guidance or local safeguarding arrangements require this.
- 8.5 The Senior Lead for Safeguarding and the Designated Safeguarding Lead will undertake safeguarding training appropriate to their respective roles and ensure they remain knowledgeable about safeguarding responsibilities relating to both children and adults at risk. Their knowledge and skills will be kept up to date through continuing professional development, safeguarding updates, and relevant learning from safeguarding reviews, legislation and statutory guidance.



PROCEDURES FOR MANAGING PATHWAYS TO HELP AND SUPPORT



- 9.1 West Ham United Football Club & West Ham United Foundation will follow the safeguarding procedures published by the relevant Local Safeguarding Children Partnership and Safeguarding Adults Board. Where concerns are identified about a child, an adult at risk or a family requiring support, we will respond in accordance with local procedures, statutory guidance and this policy.
 - 9.2 Every member of staff and volunteer is expected to maintain an attitude of *"it could happen here"* where safeguarding is concerned. When concerned about the welfare of a child or adult at risk, staff and volunteers must always act in the person's best interests, remain professionally curious and take action in accordance with this policy.
 - 9.3 All staff and volunteers are encouraged to report and record any worries and concerns and not see these as insignificant. On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse. More often, however, worries and concerns accumulate over time and build a picture of increasing risk; this is particularly true in cases of emotional abuse and neglect. It is therefore essential that concerns are recorded accurately and shared promptly in accordance with this policy to enable the appropriate agencies to assess risk and provide support at the earliest opportunity. Concerns should never be dismissed as isolated incidents without considering the wider context or any previous concerns that may indicate an emerging pattern of harm.
 - 9.4 It is not the responsibility of staff or volunteers to investigate safeguarding concerns or determine the truth of any disclosure or allegation. However, everyone has a duty to recognise concerns, respond appropriately and pass the information on in accordance with this policy.
 - 9.5 The Designated Safeguarding Lead (DSL) should normally be the first point of contact for safeguarding concerns. Any member of staff or volunteer who receives a disclosure, witnesses abuse or has concerns that a child or adult may be at risk of harm must report the concern to the DSL without delay. In the absence of the DSL, concerns should be reported to a Deputy DSL (where appointed) or the Senior Lead for Safeguarding.
 - 9.6 All safeguarding concerns must be reported without delay and recorded accurately using West Ham United Football Club & West Ham United Foundation's agreed safeguarding recording procedures.
 - 9.7 Following receipt of safeguarding information, the DSL will assess the information, consider any known history or wider context, determine the level of risk, decide what action is required and record the rationale for all decisions made.
 - 9.8 The DSL will determine whether advice, consultation, early help, internal support, referral to Children's Social Care, Adult Social Care, the Police or another agency is required.
 - 9.9 Where a referral is not made, or where another agency decides that statutory thresholds are not met, the DSL will record the reasons for that decision together with any alternative support, monitoring or review arrangements.
 - 9.10 Safeguarding concerns will continue to be monitored where appropriate, recognising that a series of lower-level concerns may collectively indicate increasing risk.
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- 9.11 West Ham United Football Club & West Ham United Foundation recognises that anyone can make a referral to Children's Social Care, Adult Social Care or the Police if they believe that a child or adult is at immediate risk of harm. Staff and volunteers should inform the DSL wherever possible, unless doing so would place someone at increased risk.
- 9.12 If, at any point, there is an imminent risk of harm to a child or adult, contact should be made with the Police immediately. Anybody can make a referral.
- 9.13 Staff and volunteers should always follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with Children's Social Care, Adult Social Care or the Police if:
- the situation is an emergency and the DSL and Senior Lead for Safeguarding are unavailable; or
 - they believe that making a direct referral is the only way to ensure the immediate safety of the child or adult at risk.
- 9.14 Any member of staff or volunteer who believes that safeguarding concerns have not been responded to appropriately should raise those concerns with the Senior Lead for Safeguarding. If they remain concerned that appropriate action has not been taken, they should contact Children's Social Care, Adult Social Care or the Police directly where necessary. No member of staff or volunteer will suffer detriment for raising safeguarding concerns in good faith.
- 9.15 We recognise that children are also vulnerable to physical, sexual and emotional abuse by their peers or siblings. Abuse perpetrated by children can be just as harmful as abuse perpetrated by an adult. It is therefore important to consider both the impact on the child who has experienced harm and the support required by the child displaying harmful behaviour. Concerns relating to child-on-child abuse will always be taken seriously and will never be dismissed as part of growing up or normal behaviour.
- 9.16 We recognise that children and adults with special educational needs and disabilities (SEND) can face additional safeguarding challenges. These may include:
- assumptions that indicators of possible abuse, such as behaviour, mood or injury, relate to the person's disability;
 - children or adults with SEND being disproportionately affected by bullying, exploitation or abuse without outwardly showing signs; and
 - communication barriers that may make it more difficult for them to disclose abuse or for concerns to be recognised.
- 9.17 We recognise that staff and volunteers may identify concerns relating to child sexual exploitation, child criminal exploitation, modern slavery, trafficking and other forms of exploitation. Any such concerns will be reported immediately to the DSL, who will consider referral to the appropriate statutory agencies.
- 9.18 We recognise that staff and volunteers may identify concerns relating to female genital mutilation (FGM), forced marriage, so-called honour-based abuse and other culturally specific forms of abuse. Any concerns will be reported immediately to the DSL, who will consider referral to the appropriate statutory agencies.
- 9.19 We recognise that safeguarding against radicalisation forms part of our wider safeguarding responsibilities. Through appropriate training, staff and volunteers will understand the indicators of radicalisation, know how to respond to concerns and understand the referral pathways available where appropriate.
- 9.20 Where there is professional disagreement regarding safeguarding decisions, West Ham United Football Club & West Ham United Foundation will seek to resolve concerns promptly through discussion with the relevant agency. Where necessary, the DSL will follow the escalation procedures published by the relevant Local Safeguarding Children Partnership or Safeguarding Adults Board to ensure that the welfare of the child or adult remains paramount.
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SAFER RECRUITMENT



- 11.1 West Ham United Football Club & West Ham United Foundation is committed to safer recruitment practices that help deter, identify and reject unsuitable applicants from working with children and adults at risk. Recruitment and selection procedures will be proportionate to the nature of the role and the level of contact with children or adults at risk.
- 11.2 Recruitment procedures will include, where appropriate to the role:
- verification of identity;
 - verification of qualifications and professional registration where required;
 - obtaining and scrutinising references;
 - not accepting open testimonials in place of references;
 - exploration of any gaps or anomalies in employment history;
 - verification of the applicant's right to work;
 - online searches or consideration of publicly available information, where appropriate to the role and permitted by law;
 - Disclosure and Barring Service (DBS) checks where legally required or otherwise appropriate;
 - barred list checks where legally permitted;
 - overseas criminal record checks or certificates of good conduct where appropriate; and
 - Social media screening and any other checks required by legislation or the nature of the role.
- 11.3 Appropriate recruitment records will be maintained to demonstrate compliance with safer recruitment requirements and West Ham United Football Club & West Ham United Foundation's recruitment procedures.
- 11.4 Anyone involved in recruiting staff or volunteers into roles involving children or adults at risk will receive appropriate safer recruitment training and guidance relevant to their responsibilities.
- 11.5 Where information obtained through recruitment or vetting processes raises safeguarding concerns but does not automatically prevent appointment, West Ham United Football Club & West Ham United Foundation will undertake a written/ suitability risk assessment before any appointment is confirmed. The assessment will consider the nature of the information, its relevance to the role, any protective measures that may be required, and whether the individual remains suitable to undertake the duties of the post. However, it is important to note that DBS content outcomes are also subject to the FA's suitability safer recruitment processes.

11.6 West Ham United Football Club & West Ham United Foundation recognises that safeguarding is an ongoing responsibility and that suitability to work with children or adults at risk does not end once recruitment has been completed. Staff and volunteers are expected to maintain appropriate professional conduct throughout their employment or engagement and report any matter that may affect their suitability to undertake their role.

11.7 Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in [relevant conduct](#); or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identities of all contractors and their staff on arrival at all sites where regulated work with children and adults at risk is undertaken.



- 11.8 West Ham United Football Club and West Ham United Foundation acknowledge that safeguarding is a continuous obligation. Suitability to work with children or vulnerable adults is not solely determined at recruitment. Staff and volunteers must submit annual self-declarations, uphold high standards of professionalism, and report any issues that could impact their suitability for their role.
- 11.9 Where concerns arise regarding the ongoing suitability of an individual working on behalf of West Ham United Football Club & West Ham United Foundation, these will be managed promptly in accordance with this safeguarding policy, the organisation's employment procedures, football regulatory and any statutory reporting duties.
- 11.10 Advertising- When advertising roles, we will make clear:
- Our organisation's commitment to safeguarding and promoting the welfare of children and adults
 - That safeguarding checks will be undertaken
 - The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
 - Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

MANAGING ALLEGATIONS AGAINST STAFF & VOLUNTEERS



- 11.11 Our aim is to provide a safe environment that promotes the wellbeing of children and adults at risk who receive services from West Ham United Football Club and West Ham United Foundation. We recognise that, on occasions, allegations of abuse may be made against those working with or in a position of trust with children or adults at risk.
- 11.12 We recognise that allegations are distressing and difficult for everyone involved. We also recognise that some allegations are genuine and that there are individuals who deliberately seek to harm or abuse children or adults at risk.
- 11.13 West Ham United Football Club & West Ham United Foundation will take all reasonable steps to safeguard children and adults at risk and to ensure that those working for, or on behalf of, the organisation are suitable to do so. We will always follow the procedures set out in Working Together to Safeguard Children 2026 and Chapter 7 of the London Safeguarding Children Procedures, seeking advice from the Local Authority Designated Officer (LADO) where appropriate.
- 11.14 If an allegation is made, or information is received, about any member of staff, volunteer or other individual working on behalf of the organisation who has:
- behaved in a way that has harmed a child, or may have harmed a child;
 - possibly committed a criminal offence against or related to a child;
 - behaved towards a child or children in a way that indicates they may pose a risk of harm to children;
 - behaved or may have behaved in a way that indicates they may not be suitable to work with children; or
 - behaved in a manner that discriminates against a child on the basis of one or more protected characteristics as defined by the Equality Act 2010,
- 11.15 The member of staff receiving the information must inform the Designated Safeguarding Lead (DSL) and/or the Senior Lead for Safeguarding immediately. This includes concerns relating to agency staff, contractors, trainees and volunteers.
- 11.16 Should an allegation be made against the Designated Safeguarding Lead, it must be reported immediately to the Senior Lead for Safeguarding.
- 11.17 The Senior Lead for Safeguarding will seek advice from the Local Authority Designated Officer (LADO) and, where appropriate, Adult Social Care within one working day. No member of staff or volunteer will undertake further enquiries before receiving appropriate advice.
- 11.18 Any member of staff or volunteer who does not feel confident raising concerns internally may contact the Local Authority Designated Officer (LADO) or the relevant Adult Social Care service directly.

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- 11.19 Suspension will not be the default response to an allegation and will only be considered where there is reason to believe that a child or adult at risk may be at continuing risk of harm, or where the allegation is so serious that dismissal may be a possible outcome. Suspension will only be considered after all reasonable alternatives have been explored.
- 11.20 Alternatives to suspension may include:
- redeploying the individual so they do not have direct contact with the child or children concerned;
 - providing appropriate supervision while the individual continues to undertake their duties;
 - redeploying the individual to alternative duties where they do not have unsupervised contact with children or adults at risk;
 - temporary redeployment to another location; and
 - seeking advice from others, including Human Resources, the Local Authority Designated Officer (LADO), the Police, FA Safeguarding and Children's Social Care, where appropriate.
- 11.21 West Ham United Football Club & West Ham United Foundation will provide appropriate support for any individual who is the subject of an allegation, including appointing a named contact to keep them informed of the progress of the case and considering any additional welfare support that may be required.
- 11.22 Parents or carers of the child or children involved will be informed about the allegation as soon as possible, where appropriate and following agreement with the Local Authority Designated Officer (LADO), Police and Children's Social Care.
- 11.23 Parents or carers will be kept appropriately informed about the progress of the case, subject to any restrictions necessary to protect the integrity of investigations.
- 11.24 The following definitions apply where there is formal oversight by the Local Authority Designated Officer (LADO):
- **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.
 - **False** – there is sufficient evidence to disprove the allegation.
 - **Unsubstantiated** – there is insufficient evidence either to prove or disprove the allegation. This does not imply guilt or innocence.
 - **Unfounded** – there is no evidence or proper basis to support the allegation.
- 11.25 Where an allegation is substantiated and the individual is dismissed, removed from regulated activity, resigns or otherwise ceases to provide their services, West Ham United Football Club & West Ham United Foundation will make a referral to the Disclosure and Barring Service (DBS) where the legal duty to do so is met.
- 11.26 Where the individual is a member of a professional regulatory body, consideration will also be given to making an appropriate referral.
- 11.27 Where an allegation is found to be unsubstantiated, unfounded, false or malicious, the Designated Safeguarding Lead will consider whether the child or person making the allegation requires additional support or whether the allegation may have been a cry for help. Where appropriate, referrals to Children's Social Care or other support services will be considered.
- 11.28 Where it is established that an allegation has been deliberately invented or made maliciously, appropriate action will be considered in relation to the individual responsible, taking account of their age, understanding and any safeguarding needs.
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- 11.29 West Ham United Football Club & West Ham United Foundation will make referrals to the Disclosure and Barring Service (DBS) where there is a legal duty to do so. Referrals will be made as soon as reasonably practicable following the removal, dismissal or resignation of the individual concerned.

Confidentiality and Information Sharing

- 11.30 Every effort will be made to maintain confidentiality and protect against unnecessary publicity while an allegation is being considered or investigated.
- 11.31 1.31 advice will be sought from the Local Authority Designated Officer (LADO), the Police, Children's Social Care, and, where appropriate, football regulatory safeguarding bodies, to determine::
- who needs to know about the allegation and what information can be shared;
 - how speculation, leaks and gossip should be managed;
 - what information, if any, should be shared with parents, carers or the wider community; and
 - how any media interest should be managed.

Record Keeping

- 11.32 Clear, accurate and confidential records will be maintained for all allegations that meet the threshold for formal allegations management and retained on the individual's confidential personnel file.
- 11.33 Where an allegation is found to be malicious or false, records will be removed from the individual's personnel file unless there is a lawful reason to retain them or the individual requests that they remain.
- 11.34 For all other allegations, the personnel record will include:
- a clear and comprehensive summary of the allegation;
 - details of how the allegation was investigated and resolved;
 - any action taken and the outcome reached; and
 - a record of whether the information will be referred to in future employment references.
- 11.35 Records relating to allegations will be retained in accordance with statutory guidance, employment legislation and West Ham United Football Club & West Ham United Foundation's Records Retention Schedule.

References

- 11.36 When providing employment references, West Ham United Football Club & West Ham United Foundation will not include allegations that have been found to be false, unfounded, unsubstantiated or malicious, or repeated allegations that have all been found to be false, unfounded, unsubstantiated or malicious.
- 11.37 Substantiated safeguarding allegations may be included where this is lawful, relevant and factually accurate.

Learning Lessons

- 11.38 Following the conclusion of any allegation, West Ham United Football Club & West Ham United Foundation will consider, alongside the Local Authority Designated Officer (LADO) where appropriate, whether any lessons can be learned to improve safeguarding policy, procedures or practice.
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Non-Recent Allegations

- 11.39 West Ham United Football Club & West Ham United Foundation recognises that abuse can be disclosed many years after it occurred.
 - 11.40 Non-recent allegations will be responded to appropriately, recognising that they may still indicate current safeguarding risks. Advice will be sought from the Local Authority Designated Officer (LADO), the Police and other relevant agencies, as appropriate, to determine the most appropriate course of action.
 - 11.41 Where an adult discloses that they were abused as a child, the organisation will respond sensitively, offer appropriate support, and consider referrals to the Police or other relevant agencies where appropriate.
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CONCERN OR ALLEGATION THAT MAY MEET THE HARMS THRESHOLD



ALLEGATION

An allegation should be considered where any person who works with children, in connection with their employment or voluntary activity, has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children;
- behaved or may have behaved in a way that indicates they may not be suitable to work with children; or
- behaved in a manner that discriminates against a child on the basis of one or more protected characteristics, as defined by the Equality Act 2010.

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 with children may have acted in a way that:

- Is inconsistent with an organisation's staff code of conduct, including inappropriate conduct outside of work; and
- Does not meet the harm threshold or is otherwise not serious enough to merit a referral to the LADO however, "The evaluation of low-level concerns should always be undertaken in consultation with the LADO" Also The FA needs to be notified of the outcome of an investigation of all low-level concerns, even if the individual remains working at the Professional Club or CCO.

APPROPRIATE CONDUCT

- Behaviour is entirely consistent with the organisation's staff code of conduct and the law.

LOW LEVEL CONCERNS



Policy Summary

- 12.1 It is essential to recognise that, in practice, different people can use the words ‘allegation’ and ‘concern’ interchangeably. Sometimes individuals may shy away from the word ‘allegation’ and express it as a ‘concern’ instead. The crucial point is that whatever the language used, the behaviour referred to may, on the one hand, be capable of meeting the harm threshold (and hence be referable), or, on the other, it does not meet the harm threshold (in which case it should be treated as a low-level concern). So, the focus should not be on the language used by the person disclosing it; it should, instead, be on the described behaviour.
- 12.2 This policy offers guidance for staff if they feel they need to share something worrying them about another member of staff who works at West Ham United FC and West Ham United Foundation (WHUFC & WHUF), but unsure whether it is a serious allegation or safeguarding matter. It may just be something that sits slightly uncomfortably with them about a member of staff or something that you feel needs some support and guidance to prevent conduct from developing into behaviour that breaches the Staff Code of Conduct.
- 12.3 This merely formalises what we already do in WHUFC and WHUF, where we encourage an environment of transparency and openness and recognise our duty to support staff to ensure best practice. In addition, the policy offers guidance on what a low-level concern is; with whom and how to pass on that concern; and information for staff should a low-level concern be raised about them.

The Purpose Of The Policy:

- 12.4 This guidance should empower staff to report situations where adults in the WHUFC & WHUF community are not quite “getting it right”. This should be regarded as a positive approach for the following reasons:
1. To allow for early intervention with staff whose actions or behaviour (deliberate or unwittingly), may be blurring the boundaries of our varying Staff Code of Conduct, Behaviour and Poor Practice Policies, and avoiding things escalating to a more problematic state; and/or:
 2. To allow for the identification of any patterns of low-level concerning behaviour which may place children or adults at risk;
 3. Reinforce to staff how key they are in keeping children and ‘adults at risk’ safe, in addition to reminding staff of their responsibility to report all concerns.

What Does WHUFC & WHF Need To Do?

- 12.5 West Ham United Football Club & West Ham United Foundation has adopted this Low-Level Concerns Policy as part of its wider safeguarding arrangements. The policy supports compliance with Football Association and relevant football league safeguarding requirements and reflects current safeguarding best practice by promoting a culture in which all concerns about adults working with children or adults at risk are identified, reported and responded to appropriately.
- 12.6 There should be transparent processes for sharing and responding to any concerns about an adult's behaviour, no matter how small. A concern can still be significant even if it does not meet the harm threshold.

WHUF & WHUF Must Evidence Taking Precautions To Ensure Adults Understand:

- What constitutes appropriate and inappropriate behaviour.
 - What a low-level concern is.
 - The importance of sharing low-level concerns.
 - How to report any concerns.
 - The process for recording, reviewing and responding to concerns.
- 12.7 This guidance reinforces the robust, transparent and holistic safeguarding culture. This guidance should be read in conjunction with this Safeguarding Policy, our Managing Allegations Procedures, the Staff Behaviour Policy, and the staff code of conduct alongside any expectations of staff member's professional registrations (where applicable).

How Does A Low-Level Concern Policy Strengthen Existing Safeguarding Procedures And Further Protect Children, 'Adults At Risk' And Staff?

- 12.8 Our aim is to always find additional ways to create, embed and reinforce a culture within our community in which all concerns about adults (including where threshold of allegations is not met) are shared responsibly and with the right person and recorded and dealt with appropriately. In turn it should enable us to identify concerning, problematic or inappropriate behaviour of staff early on, and minimise the risk of abuse.
- 12.9 We aim to ensure that adults working in or on behalf of our organisations are clear of the professional boundaries and act within them in accordance with the ethos and values of the organisation. This should ensure that staff avoid the slippage of boundaries between staff, young people, and 'adults at risk' to safeguard everyone.

12.10 To achieve this robust, holistic safeguarding culture, WHUFC and WHUF should:

- Ensure that staff are clear about and confident to distinguish expected and appropriate behaviour from concerning, problematic or inappropriate behaviour – in themselves and others, and the delineation of professional boundaries and reporting lines;
- Empower staff to share any low-level concerns with Safeguarding Managers (DSL), and help all staff to interpret the sharing of such concerns as a neutral act;
- Encourage staff to self-report should they feel their conduct or behaviour may have fallen short of staff conduct policies
- Address unprofessional behaviour and help the individual to correct such behaviour at an early stage;
- Identify concerning, problematic or inappropriate behaviour – including any patterns – to be consulted upon with (on a no-names basis if appropriate), or referred to, the LADO;
- Provide for responsive, sensitive and proportionate handling of such concerns when they are raised; and
- Help identify any weaknesses in WHFC and WHUF safeguarding system.

The Difference Between An Allegation And A Concern

12.11 It might not be clear whether an incident constitutes an ‘allegation’. It is important to remember that to be an allegation, the alleged incident has to be sufficiently serious as to suggest that harm has or may have been caused harm to a child/ren or that the alleged behaviour indicates the individual may pose a risk of harm to children (or otherwise meet the criteria above). Issues that do not meet this threshold may constitute conduct or disciplinary issues and should be addressed by employers using the appropriate organisational procedures.

Low-Level Concerns Regarding Staff Behaviour:

12.12 The term ‘Staff’ should be interpreted very widely to mean any adult associated with or working with WHUFC or WHUF, whether engaged as a paid employee, worker or self-employed contractor or unpaid member of staff or volunteer or a Board Trustee/Member.

What Is A Low-Level Concern?

12.13 A low-level concern is any concern that an adult has acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- Doesn’t meet the harm threshold or is not considered serious enough to refer to the local authority.
- Low-level concerns are part of a spectrum of behaviour. This includes:
- Inadvertent or thoughtless behaviour
- Behaviour that might be considered inappropriate depending on the circumstances
- Behaviour which is intended to enable abuse.

Examples of Low-Level Concern Behaviours (But Not Limited To):

- Using inappropriate offensive, sexualised or intimidating language
- Being over-friendly with children
- Having favourites or students (young people), developing high-dependency relationships with them
- Taking photographs of children on their personal device
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- A breach of trust or boundaries.

The FA

- 12.14 To assist the Professional Clubs and CCOs, The FA provides a non-exhaustive list of examples of low-level concerns (see appendix b- The FA Low-Level Concerns)
- 12.15 This guidance distinguishes between the behaviour of low-level concern and that which may meet the harms threshold. Staff do not need to be able to determine in each case whether their concern is a low-level concern or if it is, in fact, serious enough to consider a referral to the LADO or meets the threshold of an allegation. Once staff share what they believe to be a low-level concern, that determination is made by Safeguarding Manager (Designated Safeguarding Lead – DSL).
- 12.16 The FA currently operate under the “3 strike rule” on low-level concerns. This means that where an individual has been investigated for 2 previous allegations of low-level concerns, upon receipt of the 3rd Concern, this should be elevated as a formal referral to the Safeguarding Football Authorities due to the pattern of behaviours forming. (See appendix b – The FA Low-Level Concerns).

HOW CAN SOMEONE SHARE A LOW-LEVEL CONCERN AT WHUF & WHUF?

- 12.17 All low-level concerns should be shared with the Safeguarding Team without delay. (See appendix C for reporting flowchart). This policy forms part of an overall set of policies and procedures that fall under our safeguarding umbrella and are linked to our safeguarding Policy & Procedures.
- The sharing of low-level concerns should be made as soon as reasonably possible, ideally within 24 hours of becoming aware, particularly if this relates to a specific incident.
 - If you have concerns about the Director of Safeguarding & Inclusion’s behaviour towards a child or young person, don’t hesitate to contact Newham or your local LADO Services – at 020 3373 38031.
 - However, it is essential to note that it is never too late to share a low-level concern.

Self-Reporting

- 12.18 Occasionally a staff member may find themselves in a situation that could be misinterpreted or appear compromising to others. Equally, a member of staff may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standards set out in the Staff Behaviour Policy.
- 12.19 The Safeguarding Policy & Procedures ask all staff to share when they have found themselves in a situation that breaches or could be perceived as breaching the Staff Behaviour Policy. This is also emphasised during the new staff safeguarding induction meeting with Safeguarding Managers (Designated Safeguarding Lead – DSL).
- 12.20 Self-reporting in these circumstances can be positive for a number of reasons: it is self-protective in that it enables a potentially difficult issue to be addressed at the earliest opportunity; it demonstrates awareness of the expected behavioural standards and self-awareness as to
- 12.21 the individual's own actions or how they could be perceived; and, crucially, it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour and no "grey areas" are allowed to develop.

Reporting A Low-Level Concern About A Member Of Staff:

- 12.22 The Safeguarding Policy & Procedures states that we all have a duty to safeguard our students and that they should report any behaviours that breach or are seen to breach. This is also emphasised at the new staff safeguarding induction meeting with the Safeguarding Manager. A reminder about this is given at the start of each season in the staff briefing, and a reminder of how to communicate concerns and that this is handled with discretion.

What If I Need To Figure Out If Something Is Worthy Of Reporting?

- 12.23 You should still run this past the Safeguarding Team and allow them to make the professional judgement on what information is necessary to record for safeguarding purposes. Every member of staff (including volunteers) working at WHUFC and WHUF is advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.
- 12.24 When concerned about the welfare of a child or adult at risk, staff members should always act in the interests of the child or adult at risk and have a responsibility to take action as outlined among others, in the Club's Safeguarding Policy & Procedures; Managing Reported Concerns and Managing Pathways to Help and Support.

What Happens Next?

- 12.25 West Ham United Football Club adheres to safeguarding procedures agreed upon locally with Newham Safeguarding Children Partnership and Adults Board. Where we identify adult at risk or children and families in need of support, we will carry out our responsibilities following Newham Safeguarding Children Partnership and Adults Board guidance and Premier League and FA guidance. (See Reporting of a concern, what happens next?)

Records And Information Sharing

- 12.26 Every effort will be made to scan and upload physical evidence onto CPOMS or, where not possible, kept in a secure cabinet. These files will be the responsibility of the Safeguarding Department. The information will only be shared based on the 'need to know in the adult's or child's interests' and the understanding that it remains strictly confidential.
- 12.27 Only Safeguarding and, where appropriate, the Director of HR will have access to this information. Cases in which an allegation was proven to be malicious, false, unsubstantiated or unfounded should not be included in employer references.

References

- 12.28 This policy is clear that only substantiated safeguarding allegations will be provided in references. Low-level concerns will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. A low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. Neither should a history of repeated concerns or allegations, which have all been found to be malicious, false, or unsubstantiated, be included in any reference.
- 12.29 However, where a low-level concern (or number of concerns) has met the threshold for referral to the LADO and found to be substantiated, it will be referred to in a reference, provided that the information is factual and does not include opinions.

This Policy Should Be Read In Conjunction With:

- WHUFC & WHF Safeguarding Agreement
- Employee Handbook
- Your department's Code of Conduct
- [The FA Football's Safeguarding Children's Policy](#)

Contact Details

Speak to your workplace Safeguarding Manager or any member of the Safeguarding Team.

General Enquiries: Safeguarding@westhamunited.co.uk

THE FA - Low-Level Concerns

12.30 To assist the Professional Clubs and CCOs The FA provides a non-exhaustive list of examples of low-level concerns:

- When insufficient care is taken to avoid injuries (e.g. by excessive training or inappropriate training for the age, maturity, experience and ability of players);
- Allowing abusive or concerning practices to go unreported (e.g. a coach who ridicules and criticises players who make a mistake during a match);
- Allowing hazing practices to go unreported;
- Placing children or young people in potentially compromising and uncomfortable situations with adults (e.g. unprofessional use by a coach on social media with young players);
- Unprofessional use of their own or the Professional Club's social media accounts;
- Ignoring health and safety guidelines (e.g. wearing seat belts in club transport);
- Using foul and abusive language to children or other adults (e.g. abusive language towards match officials);
- Giving continued and unnecessary preferential treatment to certain individuals on a regular basis;
- Failure to provide safe and appropriate coaching sessions whilst taking into consideration the ages of the players (e.g. overtraining and exerting undue influence over players);
- Putting performance over the safety of players;
- Lack of respect for other individuals, such as match officials, opposition coaches, players, managers and spectators;
- Allowing rough and dangerous play, bullying, the use of bad language or inappropriate behaviour by players;
- Using punishments that humiliate or harm children;
- Providing one-to-one coaching without any supervision or the presence of other club officials;
- Allowing children to discriminate on the grounds of religion, race, gender, social class, or lack of footballing ability;
- Failure to encourage children to accept responsibility for their own performance and behaviour;
- Failure to challenge low-level concerns in other Club Officials;
- Allowing allegations of abuse to go unchallenged or unrecorded and failing to report these concerns (e.g. bystanders of abuse);
- Failure to record incidents or accidents;
- Failing to address the additional needs of disabled players or other vulnerable groups;
- Allowing confidential information to be shared inappropriately;
- Failure to respect and listen to the opinions of children and consider the rights and responsibilities of children;
- Smoking and consuming alcohol during coaching sessions;
- Consuming alcohol whilst named on duty on an official club trip;
- Taking children to their own home; and
- Not adhering to guidance when transporting children including travel abroad.

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- 12.31 The above list is not exhaustive but should provide guidance of the type of behaviour which constitutes low-level concerns. The Safeguarding Investigations Manager at The FA should always be contacted for advice and guidance on matters of low-level concerns.

Low-Level Concerns, The FA Expectations

- 12.32 The Safeguarding Football Authorities expectation and The FA's policy is that Professional Clubs and CCO deal with matters of low-level concerns in the first instance. When doing so, Professional Clubs and CCOs should also align with the PL and EFL policies and procedures, for instance Codes of Conduct and Recruitment and Selection Policies. Upon receipt of an allegation of a low-level concern, it is
- 12.33 that Professional Club or CCO's responsibility to determine the appropriate course of action and then intervene.

Submitting The Low-Level Concerns Investigation Form To The FA

- 12.34 It is not uncommon for individuals to move from different Professional Clubs and CCOs across the country.
- 12.35 If low-level concerns are not submitted to The FA, then only the investigating Professional Club or CCO will be aware of the concerns and the outcome. Therefore, when that individual changes Professional Club or CCO their record will be reset. This in turns means that when a Professional Club or CCOs approach The FA on low-level concerns there may not be a previous record of any intervention and the information cannot be shared due a lack of knowledge.
- 12.36 To ensure that all children and adults at risk are robustly safeguarded in football, The FA needs to be notified of the outcome of an investigation of all low-level concerns, even if the individual remains working at
- 12.37 the Professional Club or CCO. This will pass the responsibility to The FA to monitor persistent low-level concerning behaviours by individuals and escalate when appropriate. In some situations, the Professional Clubs or CCOs may be notified of multiple low-level concerns in one report. The FA would consider that would be one incident of low-level concerning behaviour and should be addressed and investigated collectively and appropriate and proportionate outcomes determined.

The FA "3 Strike Rule" On Low-Level Concerns

- 12.38 The FA currently operate under the "3 strike rule" on low-level concerns. This means that where an individual has been investigated for 2 previous allegations of low-level concerns, upon receipt of the 3rd Concern, this should be elevated as a formal referral to the Safeguarding Football Authorities due to the pattern of behaviours forming.
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12.39 It is advised that when Professional Clubs and CCOs are investigating low-level concerns they should contact the Safeguarding Investigations Manager at the start of the investigation. This will enable The FA to undertake checks on their records to determine if there has been any previous involvement with that individual, either by The FA or a Professional Club or CCO, which may assist on any decision-making the Professional Club or CCO may need to make.

SAFEGUARDING REPORTING TEAM CONTACT DETAILS



safeguarding@westhamunited.co.uk

Telephone Contacts

07801 406 447

07395 261 656



OTHER SAFEGUARDING CONTACTS



LONDON BOROUGH OF NEWHAM - LOCAL AUTHORITY

DESIGNATED OFFICER (LADO)

lado@newham.gov.uk | 020 3373 3803
or contact your local LADO services

PREMIER LEAGUE

safeguarding@premierleague.com | 0207 864 9000

EFL

safeguarding@efl.com | 01772 325 940

WOMEN'S SUPER LEAGUE FOOTBALL (WSL LEAGUE)

safeguarding@wslfootball.com

THE FA

safeguarding@thefa.com | 0800 169 1863

NSPCC HELPLINE

help@nspcc.org.uk | 0808 800 5000



LOCAL AUTHORITY DETAILS



Multi-Agency Safeguarding Hub (MASH)

Phone: 0208 430 2000 (Monday to Friday, 9am to 5pm)
Out of Hours: 0207 926 5555 (Monday to Friday, 5pm to 9am
weekends and public holidays) All telephone referrals need
to be followed up with a completed form within 24 hours.

Email: mash@newham.gov.uk

LADO Team

Allegations against staff and volunteers (ASV) 0203 3730440

[LADO Referral Form](#)

Phone: 0203 373 3803

Email: LADO@newham.gov.uk

Newham Safeguarding Children Partnership (LSCP)

Email Address: nscpadmin@newham.gov.uk

Prevent

[Prevent referral form](#)

Please ensure the completed form is sent to both MASH@newham.gov.uk and
SO15Mailbox-.PreventNEBCU@met.police.uk