



**Premier
League**

Safeguarding Policy

Season 2017/18





Introduction

The Premier League places great importance on safeguarding and we believe that everyone has the right to enjoy football in a safe and inclusive environment.

We are committed to creating a culture where safeguarding responsibilities and procedures for raising concerns are widely understood and embedded in our values. This Policy sets out our expectations of everyone involved with the Premier League and underpins the work undertaken to promote and protect the safety and welfare of vulnerable groups.

Please take the time to read this document and let us know if you have any questions.

Richard Scudamore
Executive Chairman

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Our commitment

The Premier League aims to adopt the highest standards to safeguard vulnerable groups. We are committed to raising safeguarding awareness and empowering everyone we engage with to identify and report concerns.

This Policy applies to everyone involved with the Premier League as we all share a responsibility for promoting and protecting the safety and welfare of vulnerable groups, irrespective of individual roles and responsibilities. Should any policies or regulations conflict, the safety and welfare of vulnerable groups should always take precedence.



Vision

To offer an enjoyable experience and create inclusive and welcoming environments where vulnerable groups are safe, valued and respected.

Core principles

- Safeguarding is everyone's responsibility and we recognise our duty to promote and protect the safety and welfare of vulnerable groups.
- Everyone has the right to protection from abuse, mistreatment and exploitation in any form.
- We strive to create an environment where everyone is empowered to protect themselves and others.
- Working together underpins the work undertaken to safeguard vulnerable groups.
- Robust and transparent governance arrangements for safeguarding are essential.

Evaluation and review

We will regularly assess the implementation and effectiveness of this Policy which will be reviewed annually or whenever there are; changes in legislation, key functions or persons within the organisation, following new or revised government or statutory guidance, or after dealing with any safeguarding concern. The most current version of this Policy will always be available to view or download from the Premier League Intranet and website.

Definitions

Child and **children** mean any person or persons who have not yet reached their eighteenth birthday.

Adult at risk means any person who may be in need of community care services because of mental or other disability, age or illness and who may be unable to take care of themselves against significant harm or exploitation. While it is recognised that some people will be vulnerable due to their learning disability or mental health needs, there are also those adults who are at risk due to a specific circumstance they may find themselves in, for example, domestic abuse, forced marriage and sexual or commercial exploitation (this is not an exhaustive list).

References to **vulnerable groups** apply to both children and adults at risk.

Staff means any person employed or deployed by the Premier League.

Participant is defined in FA regulations as an Affiliated Association, Competition, Club, Club Official, Licensed Agent, Player, Official, Match Official, Management Committee Member, Member or Employee of an affiliated club and all such persons who are from time to time participating in any activity sanctioned either directly or indirectly by the FA.

Activity means any activity or series of activities, arranged by or in the name of the Premier League, for vulnerable groups and/or to be attended by vulnerable groups.



Designated Persons

Designated Persons are members of staff responsible for managing safeguarding concerns. All concerns pertaining to the safety and welfare of vulnerable groups must be reported to the Head of Safeguarding (or the Head of HR in his/her absence).

The Premier League's Designated Persons are:

Jess Addicott

Head of Safeguarding

Tel: 020 7864 9173

Email: jaddicott@premierleague.com

Cat Paterson

Head of HR

Tel: 020 7864 9154

Email: cpaterson@premierleague.com

Other contacts

Police 101 (or 999 in an emergency)

NSPCC 24 hour helpline 0808 800 5000



The FA Safeguarding Team can be contacted by emailing:
safeguarding@TheFA.com

Aims and how we will achieve these

The aims of this Policy are to:

- Outline our commitment and expectations.
- Promote and achieve the highest safeguarding standards.
- Ensure that there are effective measures in place to assess the suitability of staff and partners.
- Ensure that there are effective measures in place to create safe and inclusive environments.
- Ensure that staff are clear about what constitutes appropriate behaviour and professional boundaries.
- Ensure that staff recognise poor practice and abuse and their responsibilities to take appropriate action when a safeguarding concern arises.



Safer recruitment and raising awareness

We are committed to safer recruitment procedures which include:

- Ensuring recruiters and interviewers are appropriately trained and supported.
- Fair and thorough application processes.
- Pre-recruitment checks which include identity verification, references and where applicable, criminal record checks.
- Role descriptions which accurately record responsibilities.
- Providing effective supervision, training and support.

All new members of staff will receive an induction which will include familiarisation with this Policy and individual safeguarding responsibilities. They will also be required to undertake regular safeguarding education delivered by the Premier League.

Our Safeguarding Policy is closely linked with our Recruitment and Selection Policy.

Disclosure rechecking period

We encourage staff who hold criminal record checks as a result of working with vulnerable groups to subscribe to the Disclosure and Barring Service (DBS) Update Service. Staff can claim the annual subscription fee be back via the expense system. We will perform Status Checks every twelve months. Any relevant investigations or offences committed in the intervening time must be reported to the Head of Safeguarding (or the Head of HR in his/her absence) immediately.

Relationships of trust

Those who have responsibility for and authority or influence over, vulnerable groups are in relationships of trust in relation to the vulnerable groups in their care. A relationship of trust can be described as one in which one party has power and influence over the other by virtue of their work or the nature of the activity. It is vital for all those in such positions of responsibility to understand the power they may have over those in their care and the responsibility they must exercise as a consequence.

Partnerships and commissioned services

We will actively promote safeguarding within all partnerships and commissioned services by:

- Ensuring that safeguarding is a primary consideration.
- Actively communicating our safeguarding policies and procedures to partners and service providers.
- Assessing the suitability of partners and service providers and the adequacy of their safeguarding and safer recruitment policies and practice.
- Ensuring that contractual agreements outline respective safeguarding responsibilities.

Propriety and behaviour

This section aims to provide a framework of expected standards and behaviour to which all staff are expected to adhere. This is not an exhaustive list. Staff are expected to ensure that the safety and welfare of vulnerable groups is the primary consideration where no policy, rules or guidelines exist.



Staff have a responsibility to maintain confidence in their suitability to work with vulnerable groups. Behaviour and actions that would lead any reasonable person to question motivation, intentions and suitability to work with vulnerable groups must be avoided.

Staff are expected to:

- Familiarise themselves with this Policy.
- Know who the Designated Persons are and how to contact them.
- Ensure the safety of the vulnerable groups in their care.
- Always act in the best interests of vulnerable groups.
- Build balanced relationships with vulnerable groups based on mutual trust.
- Maintain appropriate and professional boundaries at all times.
- Treat all vulnerable groups equally, with respect, dignity and fairness.
- Ensure that the same professional standards are applied regardless of ethnic origin, colour, nationality, race, religion or belief, gender, sexual orientation, age or disability.
- Respect the views, wishes and feelings of vulnerable groups.
- Recognise the developmental needs of children and capacity of vulnerable groups.
- Help maintain an ethos whereby colleagues, partners, vulnerable groups and their parents/guardians and carers feel able to express any concerns comfortably and safe in the knowledge that effective action will be taken as appropriate.
- Promote an environment where poor practice is challenged and reported.
- Ensure that any concerns or allegations pertaining to the safety and/or welfare of vulnerable groups are recorded and acted upon in accordance with this Policy.
- Encourage and demonstrate consistently high standards of behaviour and understand the types of behaviour that may call into question their suitability to work with vulnerable groups.
- Be aware that behaviour outside of work time may impact upon their suitability to work with vulnerable groups.
- Be aware that breaches of the law and this Policy may result in criminal and/or disciplinary action being taken against them.

Staff should never:

- Use their position of power and influence to intimidate, threaten, coerce, exploit or undermine vulnerable groups.
- Use their status and standing to form or promote inappropriate relationships. Professional boundaries must be maintained at all times.
- Use their position to gain access to information relating to vulnerable groups for their own or others' advantage. Such information should only be used or shared to protect vulnerable groups and to meet their needs.
- Carry out their duties whilst under the influence of alcohol, solvents or drugs.
- Engage in any sexual, betting, gambling or related activities or have discussions about such activities in the presence of vulnerable groups, except in a clear educational context and with the knowledge and agreement of the Premier League.
- Never use Premier League equipment to access pornography or access pornography on personal devices when on duty.
- Access, make or distribute illegal or indecent content or images of vulnerable groups.

Recognising abuse, poor practice and other safeguarding concerns

Everyone has a role to play in reporting abuse or any incident or behaviour that causes concern or puts vulnerable groups at risk of harm. Staff are not expected to be experts in recognising abuse, however, they should be vigilant and ensure that they always respond swiftly and appropriately to safeguarding allegations, concerns and incidents in line with this Policy and Premier League training.

This section describes forms of abuse, inappropriate behaviour and other safeguarding concerns that must be recorded and reported to the Head of Safeguarding (or the Head of HR in his/ her absence) who will take such steps as are considered necessary to ensure the safety and welfare of vulnerable groups.



Physical abuse: Any deliberate act causing injury or trauma to another person, for example, hitting, slapping, pushing, kicking, burning, giving a person medicine that they do not need and/or that may harm them or application of inappropriate restraint measures.

Emotional abuse: Any act or other treatment which may cause emotional damage and undermine a person's sense of well-being, including persistent criticism, denigration or putting unrealistic expectations on vulnerable groups, isolation, verbal assault, humiliation, blaming, controlling, intimidation or use of threats.

Sexual abuse: Any act which results in the exploitation of vulnerable groups, whether with their consent or not, for the purpose of sexual or erotic gratification. This may be by an adult or by a young person who is intellectually, emotionally, physically or sexually more mature than the victim. This includes non-contact activities, such as indecent exposure, involving vulnerable groups in witnessing sexual acts, looking at sexual images/pornography or grooming them in preparation for abuse (including via the internet). Whilst legally children aged sixteen have reached the age of consent for sexual activity, it is unacceptable for any member of staff to abuse their relationship of trust for sexual gratification.

Child sexual exploitation: A form of child sexual abuse. It occurs where an individual or groups of people take advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation can also take place through the use of technology.

Neglect: Ongoing failure to meet the basic needs of vulnerable groups. Neglect may involve; failing to provide adequate food, shelter including exclusion from home or abandonment, failing to protect them from physical and emotional harm or danger or the failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, basic emotional needs.

In an activity setting, it may involve failing to ensure that vulnerable groups are safe and adequately supervised or exposing vulnerable groups to unnecessary risks.

Grooming: The process of developing a relationship and trust of an individual, and sometimes their family, to exploit, abuse or traffic them. Grooming can happen both online and in person.

Radicalisation: The process by which a person comes to support terrorism and forms of extremism leading to terrorism. Anybody from any background can become radicalised. The grooming of vulnerable groups for the purposes of involvement in extremist activity is a serious safeguarding issue.

Female genital mutilation (FGM): Involves procedures that intentionally alter or injure female genital organs for non-medical reasons. The procedure has no health benefits for girls and women. The Female Genital Mutilation Act makes it illegal to practise FGM in the UK or to take women and girls who are British nationals or permanent residents of the UK abroad for FGM whether or not it is lawful in another country.

Bullying: Repeated behaviour intended to intimidate or upset someone and/or make them feel uncomfortable or unsafe, for example, name calling, exclusion or isolation, spreading rumours, embarrassing someone in public or in front of their peers, threatening to cause harm, physically hurting someone or damaging their possessions.

Cyberbullying: The use of technology to harass, threaten, embarrass, humiliate, spread rumours or target another person. By definition, it occurs among children. When an adult is the victim, it may meet the definition of cyber harassment or cyberstalking.



Bullying as a result of any form of discrimination: Bullying because of discrimination occurs when motivated by a prejudice against certain people or groups of people. This may be because of an individual's ethnic origin, colour, nationality, race, religion or belief, gender, gender reassignment, sexual orientation or disability. Actions may include unfair or less favourable treatment, culturally insensitive comments, insults and 'banter'.

Discriminatory behaviour is unacceptable and will be reported to The Football Association. This includes incidents on and off the pitch (including social media) and applies to all participants.

Poor practice: This is behaviour that falls short of abuse but is nevertheless unacceptable. It is essential that poor practice is challenged and reported even where there is a belief that the motives of an individual are well meaning. Failure to challenge poor practice can lead to an environment where abuse is more likely to remain unnoticed. Incidents of poor practice occur when the needs of vulnerable groups are not afforded the necessary priority compromising their welfare, for example, allowing abusive or concerning practices to go unreported, placing vulnerable groups in potentially compromising and uncomfortable situations, failing to ensure the safety of vulnerable groups, ignoring health and safety guidelines, giving continued and unnecessary preferential treatment to individuals.

Hazing: Any rituals, initiation activities, action or situation, with or without consent, which recklessly, intentionally or unintentionally endangers the physical or emotional well-being of vulnerable groups.

Peer-on-peer abuse: Children and young people can be taken advantage of or harmed by adults and by other children. Peer-on-peer abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children and within children's relationships (both intimate and non-intimate).

Infatuations: Vulnerable groups may develop an infatuation with a member of staff who works with them. Such situations should be handled sensitively to maintain the dignity and safety of all concerned. Staff should be aware, that in such circumstances, there is a high risk that words or actions may be misinterpreted and that allegations could be made against staff. They should therefore ensure that their own behaviour is above reproach. A member of staff who becomes aware that a child or adult at risk may be infatuated with him/her or with a colleague, should discuss this at the earliest opportunity with the Head of Safeguarding (or the Head of HR in his/her absence).

Domestic violence: Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged sixteen or over, who are or have been intimate with partners or family members regardless of gender or sexuality. This can encompass, but is not limited to psychological, physical, sexual, financial, emotional abuse and so called 'honour' based violence.

Abuse specific to adults at risk

The Care Act defines additional types of abuse related specifically to safeguarding adults at risk which are described below.

Financial or material abuse: Stealing from a vulnerable person, using them for financial gain, putting pressure on them about wills, property, inheritance or financial transactions, misusing or stealing their property, possessions or benefits. It may include depriving a person access to their money, property or assets. Financial abuse is something more usually related to adults but where professional (and future professional) footballers are concerned, this is a significant area of risk.



Coercive control: Coercive or controlling behaviour does not relate to a single incident, it is a purposeful pattern of incidents that occur over time in order for one individual to exert power, control or coercion over another. For example, restricting access to money, restricting movements, isolating the victim from family and friends, intercepting messages or phone calls.

Modern slavery: Encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

Organisational: Neglect and poor care practice within an institution or specific care setting such as a hospital or care home, or where care is provided within an adult at risk's own home. This may range from one-off incidents to ongoing ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes or practices within an organisation.

Neglect/acts of omission: Ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services or the withholding of the necessities of life, such as medication, adequate nutrition and heating.

Self-neglect: Neglecting to care for one's personal hygiene, health or surroundings and including behaviour such as hoarding.

Dealing with a disclosure

When a child or adult at risk discloses that he or she has been abused or is at risk of abuse, staff must ensure that the child or adult at risk's immediate needs are met and prioritise their safety and protection from further abuse above all else. It is important to remember that, while it is a member of staff's responsibility to be a supportive listener and to refer the information, it is not their role to counsel the child or adult at risk or to investigate their claims. Staff are, however, expected to act in the best interests of vulnerable groups at all times.

Vulnerable groups must be listened to and taken seriously. Once it has been established that a child or adult at risk has been harmed, or is at risk of being harmed, staff should not pursue the conversation any further. This is important to ensure that questions cannot be raised later about the accuracy and legitimacy of the disclosure.

This means that staff should:

- Ensure that the child's or adult at risk's immediate needs are met and that the priority is their safety and protection from further risk of harm.
- Allow the person disclosing to lead the discussion, to talk freely and at their own pace.
- Listen and remember that their role is supportive rather than investigative.
- Limit any questioning to the minimum necessary to seek clarification only.
- Put their own feelings aside and avoid expressing their views on the matter.
- Provide reassurance that the person disclosing is being taken seriously and that they are doing the right thing by disclosing.
- Be mindful that if physical abuse has taken place, they may observe visible bruises and marks, however they should not ask them to remove or adjust their clothing to observe them.
- Explain to the person disclosing what action they will be taking and that they will support them through the process.
- Always act in the best interests of vulnerable groups and seek advice from the Head of Safeguarding (or the Head of HR in his/her absence) if in any doubt about sharing information.



This means that staff should not:

- Make ambitious promises or promise confidentiality.
- Seek details beyond those the person disclosing willingly discloses.
- Document the conversation while the person is disclosing. This should be done as soon as possible after the disclosure has been made.
- Ask leading questions.
- Name behaviour and/or body parts in language different to that used by the person disclosing.
- Give the impression that the person disclosing is to blame.
- Approach the alleged abuser or person whose conduct there are concerns about.

A disclosure is not the only way that staff may be made aware of a safeguarding concern. Staff should immediately contact the Head of Safeguarding (or the Head of HR in his/her absence) if they witness an incident or come upon information that causes concern or puts vulnerable groups at risk of harm.

Recording and reporting disclosures and other safeguarding concerns

All safeguarding concerns and disclosures must always be taken seriously and every effort should be made to ensure that confidentiality is maintained for all concerned when dealing with a disclosure or a safeguarding concern. It is important to ensure that information is handled and disseminated on a 'need to know basis' only. Those who need to know are those who have a role to play in protecting the child or adult at risk and others who may be at risk, for example:

- Designated Persons (those with specific operational responsibility for safeguarding).
- Statutory authorities (Police and Local Authorities).
- The DBS who help employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups.
- Football authorities (The FA and Premier League).

Any member of staff may make a referral themselves directly to statutory and/or football authorities, particularly if they are concerned about a child's or adult at risk's immediate safety, if they are having difficulty contacting the Designated Persons or if they are concerned that a disclosure or information about a safeguarding concern has not been acted upon appropriately. The Head of Safeguarding (or the Head of HR in his/her absence) must be notified immediately after contacting a statutory authority or emergency services.

It is vital that clear and concise notes are made at the time of the concern or soon after a disclosure is made to support the completion of a more detailed record later. Our safeguarding referral form is available to download from the Premier League Intranet. If this form cannot be accessed when dealing with a disclosure or a safeguarding concern, a written record should include the following information wherever possible:

- The date and time of incident or disclosure, parties involved i.e. victim(s), the person(s) whose conduct there are concerns about, any witnesses, person(s) reporting the concern, person(s) to whom the concern was reported.
- Factual information. Staff might convey their intuitive thoughts but these should be recognised as such and should not form part of the record.
- In the case of bruises or observed injuries, a body map (a drawing of a body outline, upon which the location of bruises/injuries can be indicated) can be completed.



- The date and time of referring the information and to whom the information was referred.

Such records must be signed and dated by the individual recording the information. If more information is recalled at a later date, this should be added as an addendum. The original record must not be changed.

Staff should be aware that such records may be used as evidence for investigations and inquiries, court proceedings, disciplinary procedures and/or quality assurance purposes.

The Premier League will fully support anyone who in good faith reports his/her concerns about the safety and welfare of vulnerable groups.

Support for staff

Dealing with a disclosure or a safeguarding concern may have an impact on the well-being of the staff involved. It is important that anyone affected seeks help if they feel that they need support.

In the first instance, staff can seek support from their line manager or a member of the HR department. Alternatively, we offer a confidential employee assistance programme which is available to all staff 24 hours a day, 7 days a week. This professional support service can provide advice on all matters.

Further information about this confidential service and how to access it can be acquired through the Premier League Intranet or by talking to a member of the HR department.

Communication and media protocols

All media enquiries and communication with Premier League Clubs and other stakeholders following a safeguarding incident or about our safeguarding provision generally must be approved by our Communication and Safeguarding departments.

Managing safeguarding concerns

The Premier League takes all safeguarding allegations, concerns and incidents seriously. We are committed to working in partnership with The FA, Clubs, statutory authorities and other key stakeholders to promote and protect the safety and welfare of vulnerable groups and to strengthen safeguarding arrangements across the game.

There are many factors which can determine the outcome when dealing with a safeguarding concern, thus the action taken is determined on a case by case basis.

Whilst this Policy applies to Premier League staff and Clubs have their own safeguarding policies and procedures in place, this section and accompanying flowcharts set out how safeguarding allegations, concerns and incidents are managed within Premier League football, including thresholds for external referral and the roles of various stakeholders.



Football's safeguarding framework

- The FA sets the safeguarding policy and regulatory framework across the game.
- The Premier League has safeguarding policies and procedures in place that govern its own activities as well as rules that set out the requirements for each Club's safeguarding arrangements.
- Each Club implements their own safeguarding policies and procedures that must meet the requirements set out in Premier League Rules.

Employer role

Premier League or a Club as the employer of an individual whose conduct there are concerns about

Low level poor practice concerns that do not meet the threshold for external referral are dealt with in line with internal safeguarding and HR policies and procedures. See flowchart on page 20.

Where the threshold for external referral is met, there may be collaboration with statutory authorities and/or The FA. Stakeholder roles vary on a case by case basis. See flowchart on page 21.

Football authorities

Premier League acting in a regulatory capacity

When in receipt of a referral, Premier League action may include:

- Providing support and guidance.
- Having oversight and working with Clubs to ensure that internal procedures and football regulations are followed.
- Agreeing a Club-led internal investigation with the outcome shared with the football authorities.
- Conducting a joint investigation with The FA.
- Commissioning an independent case review in accordance with our Rules (either on our own or in conjunction with The FA).
- Participation in multi-agency strategy meetings.
- Working with Clubs to implement agreed multi-agency strategy meeting actions.
- Working with Police and football media relations to manage communication.
- Working with Clubs to ensure that learning outcomes are implemented to mitigate risk of recurrence.
- Sharing anonymised learning from cases to strengthen safeguarding provision across the game.

The FA

The FA has a team made up of safeguarding professionals who manage referrals. Where appropriate, they work in partnership with statutory authorities, the DBS, County FAs, the Premier League and football clubs when managing safeguarding cases. They assess people who pose, or may pose, a risk of harm and put in place safeguards.

The FA's regulatory framework enables them to take action against any club or participant who breaches The FA safeguarding policy or regulations. On an individual level, The FA can put in place risk management measures ranging from education, mentoring and supervision agreements, to interim and permanent suspensions.



Thresholds for referral to football authorities

A referral should be made to the football authorities where any of the following thresholds are met:

- Any allegation of abuse of a child or adult at risk by a participant or individual intending to become one.
- Any referral to or from any external authority (including, without limitation; the Police, the Local Authority or the DBS) about abuse of or unsuitable behaviour towards a child or adult at risk by a participant or individual intending to become one.
- Three or more incidents or allegations of poor practice by the same participant or individual intending to become one.

Statutory authorities

Children

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

A referral should be made to the Local Authority Designated Officer (LADO) where an individual has:

- Behaved in a way that has harmed, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child; or
- Behaved towards a child in a way that indicates they may pose a risk of harm.

The LADO is responsible for management and oversight of all child protection allegations made against staff and volunteers who work with children.

Adults at risk

Concerns or allegations of abuse should be referred to Adult Social Care or to the Police if a crime has been committed or if the person is in immediate danger taking consent into account. See the 'Giving vulnerable groups a voice' section of this Policy on page 19.

Disclosure and Barring Service

The duty to refer to the DBS is met when an employer has dismissed or removed a person from regulated activity (defined in the Safeguarding Vulnerable Groups Act as amended by the Protection of Freedoms Act) or would or may have if the person had not left, resigned, retired, been made redundant or moved to another position because the person has:

- Been cautioned or convicted for a 'relevant offence'. A 'relevant offence' for the purposes of referrals to the DBS is an offence that would result in the individual's automatic inclusion in the children's or adults' barred list.
- Engaged in 'relevant conduct'. 'Relevant conduct' is that which endangers or is likely to endanger vulnerable groups.
- Satisfied the 'harm test'.

The 'harm test' is met when an employer believes that an individual may harm, may cause to be harmed, may put at risk of harm, may attempt to harm or may incite another person to harm a child or adult at risk.



Referrals to the DBS should be made once investigations and disciplinary processes are complete (even if the person has left employment). Referrals must be made even if a significant period has passed between the allegation and the gathering of evidence to support a decision to make a referral.

Data protection

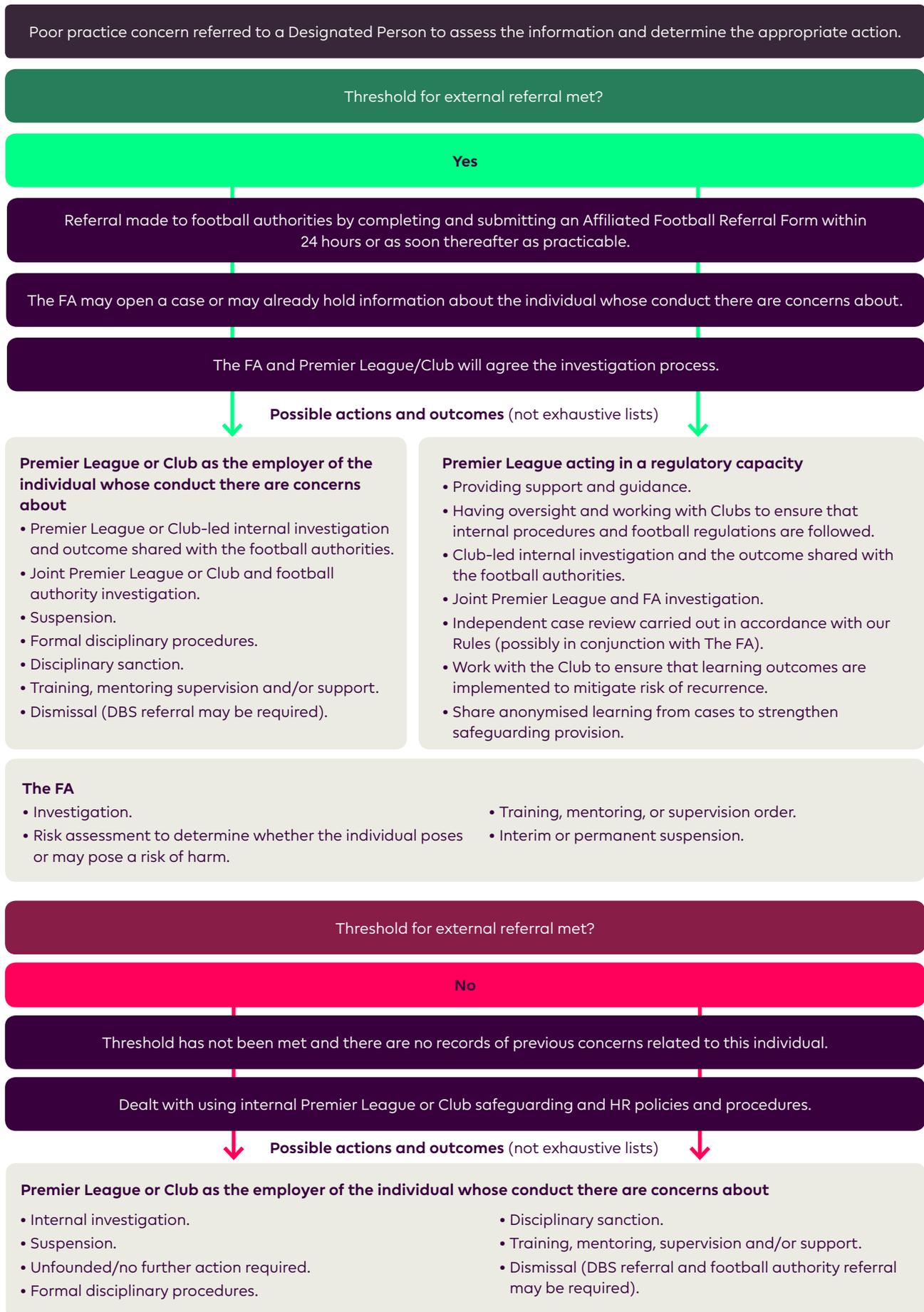
We will maintain confidentiality of all; (i) data collected (in writing or electronically) relating to vulnerable groups, (ii) information and documentation relating to safeguarding allegations, concerns and incidents and (iii) information and documentation relating to recruitment and selection procedures in accordance with relevant data protection legislation.

Giving vulnerable groups a voice

We believe that vulnerable groups have the right to be heard and involved in decisions that affect them. The Premier League will always act in the best interests of vulnerable groups and we will seek their views (and in the case of a child, the views of their parents/guardians where appropriate) as far as is feasible taking their age, understanding and capacity into account when responding to disclosures and safeguarding concerns.

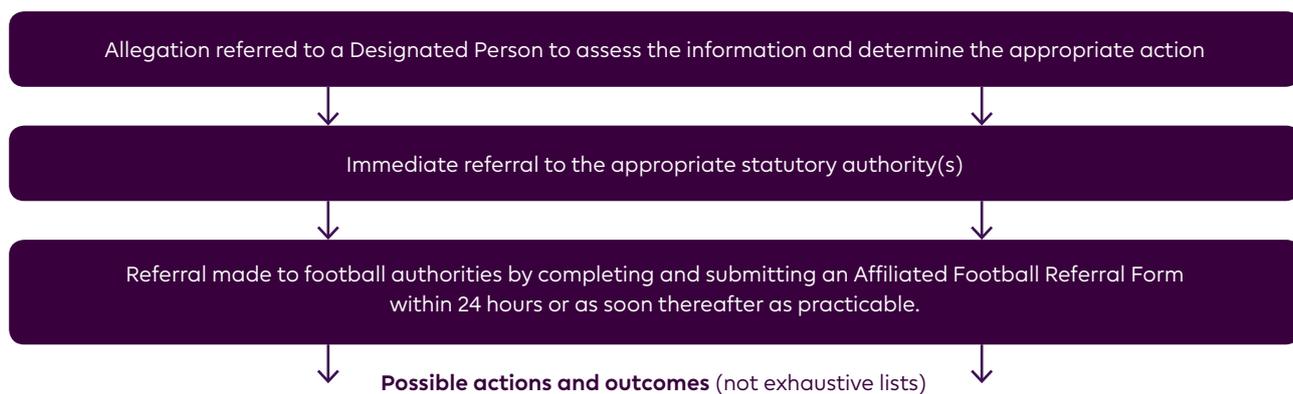
In the absence of consent from an individual making a disclosure or to whom the information relates, we will take proportionate action that does not increase the risk of harm. This may include sharing information where there is an overriding duty to do so for legitimate purposes.

Flowchart – Low level poor practice concern



More significant concerns could emerge during football-led investigations that require external referral (see flowchart on the following page).

Flowchart – Alleged serious poor practice incident/concern, abuse or criminal offence



Statutory authorities

- Multi-agency strategy meeting.
- Criminal investigation/proceedings.
- Local authority investigation.
- A joint Police and Local Authority investigation.
- Statutory authorities determine that their thresholds have not been met or that there is insufficient evidence. The concern is referred back to football to manage in line with FA, Premier League and Club policies, procedures and regulations (see process in flowchart on page seven).

Football authority and/or internal employer disciplinary procedures may be delayed pending the outcome of statutory authority processes and criminal proceedings.

The FA

- Participate in multi-agency strategy meeting.
- Investigation.
- Risk assessment to determine whether the individual does or may pose a risk of harm.
- Training, mentoring or supervision order.
- Interim or permanent suspension.

Premier League acting in a regulatory capacity

- Providing support and guidance.
- Having oversight and working with Clubs to ensure that internal procedures and football regulations are followed.
- Club-led internal investigation and the outcome shared with the football authorities.
- Joint Premier League and FA investigation.
- Independent case review carried out in accordance with our Rules (possibly in conjunction with The FA).
- Participate in multi-agency strategy meetings.
- Work with Club to implement agreed multi-agency strategy meeting actions.
- Work with the Club to ensure that learning outcomes are implemented to mitigate risk of recurrence.
- Share anonymised learning from cases to strengthen safeguarding provision.

Premier League or Club as the employer of the individual whose conduct there are concerns about

- Participate in multi-agency strategy meeting.
- Implement agreed multi-agency strategy meeting actions.
- Statutory authorities determine that their thresholds have not been met or that there is insufficient evidence. The concern is referred back to football to manage.
- Employer led investigation.
- Club investigation in conjunction with The Premier League and/or The FA.
- Suspension.
- Formal disciplinary procedures.
- Disciplinary sanction.
- Training, mentoring, supervision and/or support.
- Dismissal (DBS referral may be required).
- Provide support for those affected by safeguarding concerns and cases (in consultation with statutory authorities where appropriate to ensure that there is no conflict of treatments/support provisions).

Safer working practice

Whilst every attempt has been made to cover a wide range of activities, it is recognised that this Policy cannot cover all eventualities. Staff are expected to make judgements about their actions and behaviour to secure the best interests and safety of the vulnerable groups in their care.



Maintaining professional boundaries

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

Vulnerable groups are entitled to respect and privacy at all times, particularly when in a state of undress, changing clothes, showering or undertaking any form of personal care. Staff should not assist with personal care tasks that can be undertaken independently. All supervision measures should be transparent, consistently applied and appropriate to the needs, age and capacity of those concerned.

Allowing or encouraging a relationship to develop in a way which might lead to a sexual relationship is unacceptable. Sexual activity does not just constitute physical contact. It may also include non-contact activities, such as causing vulnerable groups to engage in or watch sexual activity, or producing pornographic material. Engaging in sexual contact or an intimate relationship with a child or adult at risk with whom a member of staff comes into contact through their role (whatever the circumstances) will be considered to be a breach of trust, leading to a referral to the appropriate statutory and football authorities.

In all circumstances where a child or adult at risk initiates inappropriate contact, it is the responsibility of the member of staff to sensitively deter them and help them understand the importance of personal boundaries. Should inappropriate contact be initiated by a child or adult at risk, then it must be recorded and reported to the Head of Safeguarding (or the Head of HR in his/her absence). In addition, if a member of staff believes their own actions could be misinterpreted or if an action is observed by another member of staff and considered to be inappropriate or possibly abusive, the incident and circumstances should also be recorded and reported.

Communication

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

This means that staff should:

- Never share any personal information and should not request any personal information from vulnerable groups. The Premier League must be aware of all personal data processed by staff.
- Be circumspect in their communications with and about vulnerable groups to avoid any possible misinterpretation of their motives or behaviour.
- Only contact vulnerable groups for professional reasons and with the agreement and knowledge of the Premier League.

Safe event management

We believe that safeguarding should be a primary consideration during the planning, delivery and review of all our activities. The focus for such activities should always be the safety, welfare and enjoyment of the vulnerable groups involved.

Staff are expected to ensure that the Head of Safeguarding is involved at the early planning stages of all activities.



Key considerations:

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

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

Supervision and ratios

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

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

Lone working and one-to-one situations

A lone worker, for the purpose of this Policy, is defined as a member of staff who is engaged in activities which place them in a situation without direct contact with other staff or without direct supervision. Lone working and one-to-one situations with vulnerable groups require additional and specific safeguards to be in place, as they have the potential to make vulnerable groups more at risk of harm by those who seek to exploit their relationship of trust.

Under no circumstances should staff visit vulnerable groups in their homes outside agreed work arrangements. Nor should they invite vulnerable groups to their own home or to that of a family



member, colleague or friend. Contact by whatever means and meetings with vulnerable groups outside agreed working arrangements should not take place without the agreement of the Premier League and in the case of a child, they should not take place without a parent/guardian being present. The Head of Safeguarding should be consulted in all such instances.

This means that staff should:

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

Photography and video footage

Photography and video footage includes the taking of still photographs, filmed and moving images and video recordings by whatever means. Staff should never take, display or distribute images of vulnerable groups without their knowledge or consent (and parental/guardian consent in the case of a child) and without the agreement and knowledge of the Premier League. Carer consent is not required prior to taking images and/or video footage of adults at risk, however, care must be taken to ensure that the adult at risk understands the implications of the image being taken, especially if it is to be used for any publicity purposes or published in the media or on the internet.

Our activity consent form is available to download from the Premier League Intranet.

Interviewing children

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

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

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

Interviewers: The Premier League will ensure that only those with sufficient experience and expertise are appointed to interview children.

Interviewers must ensure that:

- They adhere to Premier League policies, procedures and guidance.
- Interviews take place in safe and appropriate environments.
- They request permission to record interviews.
- They maintain professional boundaries at all times.
- Contact by whatever means and meetings with children should never take place without the agreement and knowledge of the Premier League and the child's parents/guardians.
- They record and report any situation which may place a child at risk or which may compromise the Premier League's or his/her own professional standing.



- Information suggesting that vulnerable groups are at risk of harm is immediately reported to the Head of Safeguarding (or the Head of HR in his/her absence).

Transport

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

This means that staff should:

- Only transport vulnerable groups if it is part of their role and responsibilities.
- Ensure that they are fit to drive and free from any drugs, alcohol or medicine that is likely to impair their judgement and/or ability to drive.
- Ensure that all arrangements for vehicle, passenger and driver safety are in place, including appropriate licence and insurance documents.
- Be aware that, while they are in their care, the safety and welfare of the vulnerable groups is their responsibility.
- Ensure that their behaviour and that of passengers, is appropriate at all times.
- Ensure that emergency arrangements are justified, recorded and reported.

First aid and administration of medication

In circumstances where a child or adult at risk needs medication regularly, a health care plan should be established to ensure the safety and protection of vulnerable groups and the staff who are working with them.

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

Children: Parents/guardians should always be informed when first aid has been administered.

Adults at risk: Carers may be informed, where appropriate, with the consent of the adult at risk.

This means that staff should:

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

Gifts, rewards and selection

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

Behaviour management

Vulnerable groups have a right to be treated with respect and dignity at all times, even in circumstances where they display difficult or challenging behaviour. When dealing with vulnerable groups who display negative or challenging behaviours, staff may consider options such as de-escalation techniques through communication, time out during the activity, temporary



exclusion or behavioural reinforcement measures (Premier League agreed rewards or sanctions/ consequences). Vulnerable groups must never be subject to any form of treatment that is harmful, abusive, humiliating or degrading.

Parents/guardians of children should be informed where behaviour management measures are deployed.

Premier League
30 Gloucester Place
London W1U 8PL
premierleague.com

T +44(0)20 7864 9000
F +44(0)20 7864 9001
E safeguarding@premierleague.com