



**Premier
League**

Safeguarding Policy

Season 2019/20

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 Children, Young People and Adults at Risk.

Please familiarise yourself with this Policy and let us know if you have any questions.



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Interim Chief Executive

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Our commitment

Safeguarding is important to us and we are committed to raising awareness and empowering everyone we engage with to create safe environments, identify and report concerns.

This Policy outlines our approach to safeguarding and applies to everyone involved with the Premier League and Premier League Charitable Fund, as we all share a responsibility for promoting and protecting the safety and welfare of Children, Young People and Adults at Risk, irrespective of individual roles and responsibilities.

Should any policies or regulations conflict, the safety and welfare of Children, Young People and Adults at Risk should always take precedence.

Vision

To offer an enjoyable experience and to create inclusive and welcoming environments where Children, Young People and Adults at Risk 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 Children, Young People and Adults at Risk.
- 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 Children, Young People and Adults at Risk.
- 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

Activity means any activity or series of activities, arranged by or in the name of the Premier League or Premier League Charitable Fund, for Children, Young People and/or Adults at Risk, or to be attended by Children, Young People and/or Adults at Risk.

Adult at Risk means any person aged eighteen or over who has needs for care and support (whether or not the local authority is meeting any of those needs) and is experiencing, or at risk of, abuse or neglect and as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect. This may include people with learning disabilities, sensory impairments, mental health needs, older people and people with a physical disability or impairment. It may also include people who are affected by the circumstances that they are living in, for example, experiencing domestic violence. An individual's level of vulnerability to harm may vary over time depending on the circumstances they are in and their needs at that time.

Child, Children, Young Person and Young People

means any person(s) who have not yet reached their eighteenth birthday.

Club means an association football club in membership of the Premier League.

Club Community Organisation ("CCO") means an organisation established or affiliated to a professional football club that exists to achieve a positive impact in the communities in which they operate and in the lives of those that access their services.

Premier League Charitable Fund ("PLCF") is the charity which has the principal objective of distribution and governance of funding in the form of grants to organisations, particularly Club Community Organisations, enabling them to deliver agreed community focused initiatives which have a positive influence on a wide range of beneficiaries.

Safeguarding: Children and Young People

Safeguarding Children and Young People is the action that is taken to promote the welfare of children and protect them from harm.

This means:

- Protecting Children and Young People from abuse and maltreatment;
- Preventing harm to their health or development;
- Ensuring they grow up with the provision of safe and effective care; and
- Taking action to enable all Children and Young People to have the best outcomes.

Safeguarding: Adults at Risk

Safeguarding Adults at Risk 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.

Abuse of adults links to the circumstances rather than the characteristics of the people experiencing the harm. An individual's level of vulnerability to harm may vary over time depending on the circumstances they are in and their needs at that time.

Labelling groups of people (such as people with learning disabilities or older people) as inherently 'vulnerable' is seen to be disempowering. Instead the Care Act describes adults potentially 'at risk' from harm or abuse.

Staff and Partners means any persons employed or deployed by a Club or CCO whether in a paid, voluntary, consultancy or third-party capacity.

The Football Association ("The FA") is English football's governing body.

Designated safeguarding Staff

While safeguarding is everyone's responsibility, our Safeguarding Team hold specific strategic and operational responsibilities for safeguarding within the Premier League.

Premier League Safeguarding Team:

Jess Addicott
Head of Safeguarding

t: 020 7864 9173
e: jaddicott@premierleague.com

Christie Ferguson
Safeguarding Manager

t: 020 7864 9224
e: cferguson@premierleague.com

Kevin Plumb
Director of Legal Services and Senior Safeguarding Lead

t: 020 7864 9175
e: kplumb@premierleague.com

Evan Ray
Head of Legal – Commercial and Compliance

t: 020 7864 9034
e: eray@premierleague.com

External safeguarding contacts



The FA Safeguarding Team
t: 0800 169 1863 and ask to speak to The FA Safeguarding Team
e: safeguarding@thefa.com

NSPCC

Contact the NSPCC helpline by calling 0808 800 5000 or by emailing help@nspcc.org.uk to get advice or share your concerns about a child. Trained professionals are available 24 hours a day, 7 days a week.

ann craft trust

acting against abuse

Contact the Ann Craft Trust safeguarding adults advice helpline by calling 0115 951 5400.

POLICE

In an emergency or if someone is in immediate danger, call the Police on 999 (101 for non-emergencies).

Aims and how we will achieve these

The aims of this Policy are to:

- Outline our commitment, procedures 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 and maintain 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 are empowered to take appropriate action when a safeguarding concern arises.

Getting the right people involved

Safer recruitment and procurement procedures are an essential part of safeguarding.

Safer recruitment

The Premier League is committed to getting the right people involved, preventing unsuitable people from working with Children, Young People and Adults at Risk, and actively promoting safeguarding within all partnerships and commissioned services.

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.

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

Partnerships and commissioned services

We are committed to actively promoting safeguarding within all partnerships and commissioned services by:

- 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.
- Working together to protect the safety and welfare of Children, Young People and Adults at Risk.

Staff and Partners responsibilities:

- ✓ Work with our HR and Safeguarding Teams to ensure all pre-recruitment and suitability checks have concluded prior to allowing an individual to commence their role whether in a paid, voluntary, consultancy or third-party capacity.
- ✓ Work with our Safeguarding Team to assess the suitability of partners and service providers, and the adequacy of their safeguarding and safer recruitment policies and practice.
- ✓ Work with our Legal and Safeguarding Teams to ensure that contractual agreements address safeguarding and that all those involved understand their respective responsibilities.
- ✓ Ensure that our safeguarding, recruitment and procurement procedures are adhered to.

Raising awareness

All Staff and Partners are required to undertake regular safeguarding education delivered by the Premier League at a level appropriate to individual roles and responsibilities regardless of their background or level of expertise.

Propriety and behaviour

This section aims to provide a framework of expected standards and behaviour that contribute to ensuring that a safer culture is developed and maintained.

This is not an exhaustive list of expected and prohibited behaviours. Staff and Partners are expected to act in the best interests of Children, Young People and Adults at Risk and ensure that their safety and welfare is a primary consideration where no policy, rules or guidelines exist.

Staff and Partners are expected to:

- ✓ Familiarise themselves with this Policy.
- ✓ Know who the Safeguarding Team is and how to contact them.
- ✓ Ensure the safety of the Children, Young People and Adults at Risk in their care.
- ✓ Always act in the best interests of Children, Young People and Adults at Risk.
- ✓ Build balanced relationships with Children, Young People and Adults at Risk based on mutual trust.
- ✓ Maintain appropriate and professional boundaries at all times.
- ✓ Treat all Children, Young People and Adults at Risk 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 Children, Young People and Adults at Risk.
- ✓ Recognise the developmental needs of Children and Young People and capacity of Children, Young People and Adults at Risk.
- ✓ Help maintain an ethos whereby colleagues, partners, Children, Young People and Adults at Risk and their parents, legal 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 Children, Young People and Adults at Risk 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 Children, Young People and Adults at Risk.
- ✓ Be aware that behaviour outside of work time may impact upon their suitability to work with Children, Young People and Adults at Risk.
- ✓ Be aware that breaches of the law and this Policy may result in criminal and/or disciplinary action being taken against them.

Staff and Partners must never:

- ✗ Use their position of power and influence to intimidate, threaten, coerce, exploit or undermine Children, Young People and Adults at Risk.
- ✗ Use their status and standing to form or promote inappropriate relationships. Professional boundaries must be maintained at all times. See page 21 or more information about professional boundaries.
- ✗ Use their position to gain access to information relating to Children, Young People and Adults at Risk for their own or others' advantage. Such information should only be used or shared to protect Children, Young People and Adults at Risk and to meet their needs.
- ✗ Carry out their duties whilst under the influence of alcohol, solvents or drugs.
- ✗ Engage in any sexual or related activities, or have discussions about such activities, in the presence of Children, Young People and Adults at Risk, except in a clear educational context and with the knowledge and agreement of the Premier League/PLCF.
- ✗ Never use Premier League/PLCF equipment to access pornography or access pornography on personal devices when on duty.
- ✗ Access, make or distribute illegal or indecent content or images of Children or Adults at Risk.

Relationships of trust

Those who have responsibility for, authority or influence over Children, Young People and/or Adults at Risk are in relationships of trust in relation to the Children, Young People and/or Adults at Risk 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 they are engaged in.

It is important for Staff and Partners to be aware of the power imbalance inherent in their role with Children, Young People and/or Adults at Risk and the responsibility that must be exercised as a consequence.

Staff and Partners have a responsibility to ensure that their position and/or influence is not used for personal advantage or gratification.

Recognising and responding to abuse, poor practice and other safeguarding concerns

Abuse and poor practice could be perpetrated by anyone and could take place anywhere, for example, in a person's own home, their community, their peer groups, at school, a hospital or within a sport activity.

The Premier League and PLCF are committed to making it as difficult as possible for anyone to be abused, exploited and mistreated.

Staff are not expected to be experts in recognising abuse, however, knowledge, understanding and being able to recognise abuse and poor practice contributes to a safer culture and environment.

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 wellbeing, including persistent criticism, denigration or putting unrealistic expectations on Children, Young People and Adults at Risk, isolation, verbal assault, humiliation, blaming, controlling, intimidation or use of threats.

Sexual abuse: Any act which results in the exploitation of Children, Young People and Adults at Risk, whether with their consent or not, for the purpose of sexual or erotic gratification. This includes non-contact activities, such as indecent exposure, involving Children, Young People and Adults at Risk in witnessing sexual acts, looking at sexual images/ pornography or grooming them in preparation for abuse (including via the internet). Whilst the age of consent (the age at which a person is considered to be legally competent to consent to sexual acts) is sixteen, it is unacceptable for Staff and Partners 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 or Young Person 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.

County lines: The organised criminal distribution of drugs by gangs from the big cities into smaller towns and rural areas using Children, Young People and Adults at Risk. Gangs recruit Children, Young People and Adults at Risk through deception, intimidation, violence, debt bondage and/or grooming. Gangs also use local property as a base for their activities, and this often involves taking over the home of an Adult at Risk who is unable to challenge them. County line gangs pose a significant threat to Children, Young People and Adults at Risk upon whom they rely to conduct and/or facilitate such criminality.

Cuckooing: Cuckooing is a term often linked to county lines. Cuckooing is when gangs establish a base in the location they are targeting for drug dealing and to operate their criminal activity from, often taking over the homes of adults at risk by force or coercion.

People exploited in this way will quite often be exposed to physical, mental and sexual abuse, and in some instances will be trafficked to areas a long way from home as part of the network's drug dealing business.

Victims of 'cuckooing' are often drug users but can include older people, those suffering from mental or physical health problems, female sex workers, single mums and those living in poverty. Victims may suffer from other forms of addiction, such as alcoholism.

Neglect: Ongoing failure to meet the basic needs of Children, Young People and Adults at Risk. Neglect may involve failing to provide adequate food or shelter including exclusion from home or abandonment, failing to protect them from physical and emotional harm or danger or 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 Children, Young People and Adults at Risk are safe and adequately supervised or exposing them to unnecessary risks.

Grooming: The process of developing a relationship with and the 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 Children, Young People and Adults at Risk 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 and Young People. When an adult is the victim, it may meet the definition of cyber harassment or cyberstalking.

Discriminatory abuse: Abusive or bullying behaviour because of discrimination occurs when motivated by a prejudice against certain people or groups of people. This may be because of an individual's ethnic origin, colour, nationality, race, religion or belief, gender, gender reassignment, sexual orientation or disability. Actions may include unfair or less favourable treatment, culturally insensitive comments, insults and 'banter'. Discriminatory behaviour is unacceptable and will be reported to The FA. This includes incidents on and off the pitch (including social media).

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 Children, Young People and Adults at Risk are not afforded the necessary priority, compromising their welfare, for example, allowing abusive or concerning practices to go unreported, placing Children, Young People and Adults at Risk in potentially compromising and uncomfortable situations, failing to ensure the safety of Children, Young People and Adults at Risk, ignoring health and safety guidelines, or giving continued and unnecessary preferential treatment to individuals.

Hazing: Any rituals, initiation activities, actions or situations, with or without consent, which recklessly, intentionally or unintentionally endangers the physical or emotional wellbeing of Children, Young People and Adults at Risk.

Peer-on-peer abuse: Children, Young People and Adults at Risk can be taken advantage of or harmed by their peers. Peer-on-peer abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between individuals and within relationships (both intimate and nonintimate).

Infatuations: Children, Young People and Adults at Risk may develop an infatuation with a member of Staff or Partners who works with them. Such situations should be handled sensitively to maintain the dignity and safety of all concerned. Staff and Partners 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 and Partners. They should therefore ensure that their own behaviour is above reproach. Staff and Partners who become aware that a Child, Young Person or Adult at Risk may be infatuated with him/her or with a colleague, should discuss this at the earliest opportunity with the Safeguarding Team.

Domestic violence or abuse: 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.

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 or institutional abuse: 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, including behaviour such as hoarding.

Signs and indicators

Indications that a Child, Young Person or Adult at Risk may be being abused can be difficult to recognise. Some signs and indicators may be explained by something plausible, for example, bereavement, sudden absence of a parent or carer, adolescence or accidental injury.

The presence of one or more signs and indicators should not be taken as proof that abuse has or is taking place, however Staff and Partners do not need evidence to report a concern. A person may be at increased risk of harm if you fail to report your concerns.

No single person can have a full picture of a Child, Young Person's or Adult at Risk's circumstances. Staff and Partners should never think that their concerns are not significant enough to act on.

Staff and Partners should discuss their concerns with the Premier League's Safeguarding Team.

Signs and indicators of abuse and other safeguarding concerns described in this section can be found at Appendix 1.

Responding to disclosures, safeguarding incidents and concerns

Responding to safeguarding incidents and concerns

All disclosures, incidents and allegations must be taken seriously and responded to in line with the Premier League's Safeguarding Policy and training. This includes allegations about non-recent abuse and allegations made against deceased individuals.

Staff and Partners should contact the Premier League Safeguarding Team without delay if they witness an incident or come upon information pertaining to the safety and welfare of Children, Young People or Adults at Risk.

Anyone can contact emergency services or make a referral directly to statutory agencies, particularly if they are concerned about a Child's, Young Person's or Adult at Risk's immediate safety, if they are having difficulty contacting a member of the Premier League Safeguarding Team or if they are concerned that a disclosure or information about a safeguarding concern has not been acted upon appropriately.

The Premier League and PLCF will fully support anyone who in good faith reports their concerns about the safety and welfare of Children, Young People and Adults at Risk.

What is a disclosure?

A disclosure is the process by which a person starts to share that they have been abused with others.

This can happen in a variety of ways including:

- **Directly:** Telling someone what has happened to them.
- **Indirectly:** Inadvertently or deliberately communicating through behaviours, emotions, art, writing, appearance, inquiries or discussions about fears, concerns or relationships.

We recognise that it takes extraordinary courage for someone to go through the journey of disclosing abuse and we will ensure that appropriate action is taken to support and protect them.

Responding to a disclosure

Listen

- ✓ Staff and Partners should give their full attention to the person disclosing and should keep their body language open and encouraging.
- ✓ Staff and Partners should respect pauses and not interrupt the person disclosing.
- ✓ Staff and Partners should limit any questioning to the minimum necessary to seek clarification only. When seeking clarification, Staff and Partners should use the language of the person disclosing to show that it is their experience.

Reassure

- ✓ Staff and Partners should provide reassurance that the person disclosing is being taken seriously and that they are not to blame.

Views and wishes

- ✓ Staff and Partners should engage the person disclosing as far as possible about how best to respond to their safeguarding situation.
- ✓ Staff and Partners are expected to act in the best interests of Children, Young People and Adults at Risk. Seek advice from the Premier League Safeguarding Team without delay if in any doubt about what action to take, including sharing information.

Safety

- ✓ Staff and Partners should ensure that the immediate needs of the person disclosing are met and should prioritise their safety and protection above all else. This may involve contacting emergency services and/or statutory agencies. The Premier League's Safeguarding Team must be immediately notified of all such action.

Take action

- ✓ Staff and Partners should explain to the person disclosing what action they will be taking and that they will support them through the process. There may be circumstances where it is not appropriate to explain the actions that will be taken, for example, a child's age and understanding or if doing so would place the person at greater risk of harm.
- ✓ Staff and Partners should refer details of the disclosure to the Premier League's Safeguarding Team.
- ✓ Where it is suspected that a crime has been committed, the police should be contacted immediately, and physical, forensic and other evidence must be preserved.

Record

- ✓ Good record keeping is essential safeguarding practice. It is vital that Staff and Partners make a written record as soon as possible after the person has disclosed, their immediate needs have been met and the appropriate referrals have been made.

Staff and Partners should contact the Premier League Safeguarding Team if in doubt about recording requirements.

Staff and Partners must never:

- ✗ Make ambitious promises or promise confidentiality.

- ✗ Seek details beyond those the person willingly discloses.
- ✗ Ask leading questions.
- ✗ Give the impression that the person disclosing is to blame.
- ✗ Approach the alleged perpetrator of abuse or person whose behaviour and/or actions there are concerns about.

The flowcharts in Appendix 3 outline the steps to be taken by Staff and Partners when dealing with a disclosure, safeguarding incident or allegation.

Recording information

All incidents, allegations and disclosures must be recorded on a Premier League Safeguarding Referral Form which can be found at Appendix 2. If Staff and Partners are unable to access our Safeguarding Referral Form, a written record should include the following information:

- Provide a factual account of what you have observed or have been told.
- The date and time of what you have witnessed or been told.
- Details of those involved: (i) person(s) whose safety and welfare there are concerns about, (ii) alleged perpetrator of abuse or person(s) whose behaviour or actions there are concerns about, (iii) witnesses and (iv) any third party who has raised concerns.
- Action taken and your rationale for taking these actions.
- Date and time of referring the information and to whom the information was referred.
- Your details as the referrer.

Staff and Partners are expected to:

- ✓ Provide clear, concise and relevant information.
- ✓ Record information in an objective and professional manner.
- ✓ Record factual information rather than assumption of what you have witnessed or been told.
- ✓ Record actual words and language. Don't rephrase what you have been told or leave things like insults or intimate vocabulary out.

- ✓ Record observations, for example, a description of visible bruising or injuries. Never ask someone to remove or adjust their clothing to observe any bruises, marks or injuries.

If more information is recalled at a later date, this should be added as an addendum. The original record must not be changed.

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

Confidentiality

All disclosures, safeguarding incidents and allegations must be taken seriously, and every effort should be made to ensure that confidentiality is maintained for all concerned.

Those who need to know are those who have specific responsibilities to support and protect the Child, Young Person or Adult at Risk and others who may be at risk, for example, statutory agencies, the Premier League Safeguarding Team, The FA, parents and carers.

Communication and media protocols

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

Support for Staff and Partners

Dealing with a disclosure or a safeguarding incident may have an impact on the wellbeing of those involved. It is important that anyone affected seeks help if they feel that they need support.

Premier League employees

Employee assistance programme

Staff and Partners can access this independent and confidential professional support service which offers 24/7 telephone counselling.

Therapist appointments

Staff and Partners experiencing mental health issues can access face to face appointments with a therapist at our local partner Clinic. Staff and Partners confidentiality as a patient will be protected and not shared anywhere.

Staff and Partners can access further details about the support available to them via the Premier League Intranet and our HR Team.

Consultants, volunteers and partners

Consultants, volunteers and partners can contact our HR Team for support with signposting and accessing support.

Mind provide advice and support to anyone experiencing a mental health problem.



e: HR@premierleague.com

t: 020 7864 9000 and ask to speak to a member of the HR Team



<https://www.mind.org.uk/>

Managing safeguarding concerns

Working together underpins our work to effectively safeguard Children, Young People and Adults at Risk.

We are committed to working in partnership with The FA, Clubs, CCOs, statutory agencies and other key partners to safeguard Children, Young People and Adults at Risk. By working together, we create a culture where safeguarding responsibilities and procedures for creating safe environments and raising concerns are widely understood and embedded in our values and practices.

While this Policy applies to Premier League and PLCF Staff, this section and accompanying flowcharts in Appendix 4 set out how safeguarding concerns are managed across the game, including thresholds for external referral and the roles of key stakeholders.

Our Safeguarding Policy is closely linked with our Managing Allegations against Staff Policy.

Football's safeguarding framework

- The FA sets the safeguarding policy and regulatory framework across the game.
- The Premier League and PLCF have safeguarding policies and procedures in place that govern their own Activities, as well as rules and requirements that govern Club and CCO safeguarding arrangements.
- Clubs and CCOs implement their own safeguarding policies and procedures that must be consistent with football regulations, legislation, statutory guidance and current best practice.

Employer role

Premier League, PLCF, Club or CCO as the employer of an individual whose conduct or behaviour 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 employer policies and procedures. Where the threshold for external referral is met, there may be collaboration with statutory agencies and/or the Football Authorities.

See flowchart 1 in Appendix 4.

Football Authorities

Premier League and/or PLCF acting in a regulatory capacity

When in receipt of a referral from a Club or CCO, action may include:

- Providing support and guidance.
- Having oversight and working with Clubs/CCOs to ensure that internal procedures and football regulations are followed.
- Agreeing a Club/CCO-led internal investigation with the outcome shared with the Football Authorities.
- Conducting a joint investigation with The FA.
- Commissioning an independent case review (possibly in conjunction with The FA).
- Participation in multi-agency strategy meetings.
- Working with Clubs/CCOs to implement agreed multi-agency strategy meeting actions.
- Working with Police and football media relations to

manage communication.

- Issuing of sanctions against Clubs/CCOs where Premier League Rules and/or PLCF requirements have been breached.
- Suspension or termination of CCO grant payments by the PLCF.
- Working with Clubs/CCOs 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 affiliated person or organisation that breaches their safeguarding regulations and policies. 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 must be made to the Football Authorities within 24 hours (or as soon thereafter as practicable) where any of the following thresholds are met:

- Any referral to or from any external authority (including, without limitation; the Police, Local Authority, DBS or Charity Commission) about abuse a Child, Young Person or Adult at Risk by any current, prospective or former employee, volunteer or consultant of the Premier League, PLCF, a Club or CCO. This includes allegations of non-recent abuse.
- A third or subsequent allegation of poor practice in relation to a Child, Young Person or Adult at Risk by any employee, volunteer or consultant of the Premier League, PLCF, a Club or CCO, whether similar in nature or otherwise.
- Any allegation or information about abuse of a Child, Young Person or Adult at Risk by a Club academy player or CCO participant/beneficiary.

Statutory agencies

Children and Young People

The Police should be contacted if a crime has been committed against a Child/Young Person or if a Child/Young Person 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/Young Person;
- Possibly committed a criminal offence against or related to a Child/Young Person; or
- Behaved towards a Child/Young Person 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 Partners and volunteers who work with Children/Young People.

Adults at Risk

The Police should be contacted if a crime has been committed against an Adult at Risk and/or if an Adult at Risk is in immediate danger.

A referral should be made to Adult Social Care where an individual has:

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

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 Children, Young People and Adults at Risk 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 Children, Young People and Adults at Risk.

- 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, Young Person 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.

Charity Commission

The Charity Commission is the statutory regulator of charities in England and Wales. The PLCF and CCOs are required to report serious incidents, which include safeguarding issues, to the Charity Commission.

Government guidance states that if a serious incident takes place, a charity needs to report what happened and explain how they are dealing with it, even if they have reported it to the police, donors or another regulator.

The Charity Commission's priority is to ensure that Trustees meet their legal requirements and obligations. Where there has been abuse or non-compliance, the Charity Commission may require corrective action to be taken by the trustees, including directing them to take action or certain actions.

The Charity Commission takes enforcement action against charities in a variety of ways. This includes regulatory action taken during investigations and its other regulatory work into individual charities. When the Charity Commission has opened an investigation, it may use its temporary and/or permanent powers of protection.

The Charity Commission's powers include (amongst others):

- Requiring corrective action be taken by Trustees.
- Agreeing an action plan for the charity.
- Undertaking checks to monitor action taken by the charity.
- Referring concerns to statutory authorities and/or to specialist bodies responsible for designated areas, such as education or health and social care.

- Restricting the transactions that a charity may enter into.
- Appointing additional Trustees.
- Freezing a charity's bank account.
- Suspending or removing a Trustee.
- Appointing an interim manager.

Thresholds for referrals to the Charity Commission

A referral should be made to the Charity Commission where the following thresholds are met:

- Any incident that results in significant harm to Children, Young People and/or Adults at Risk.
- A breach of the PLCF's or a CCO's policies or procedures that puts Children, Young People and/or Adults at risk of harm.
- Failure to carry out checks which would have identified that a person is disqualified in law, under safeguarding legislation, from working with Children, Young People or Adults at Risk.
- Any allegation of abuse of a Child, Young Person and/or Adult at Risk while under the care of the PLCF or a CCO, or by someone connected to the PLCF or a CCO, for example, a Trustee, employee, volunteer, consultant or other person who comes into contact with the PLCF or a CCO through its work.

Making a referral to the Charity Commission

Responsibility for reporting serious incidents rests with a charity's Trustees but in practice this may be delegated to someone else within the charity, such as an employee. If a PLCF or CCO Trustee is reporting the incident, they will need to confirm that they have authority to report on behalf of the Trustee Body.

Where the threshold for referral to the Charity Commission is met, a report should be made by emailing RSI@charitycommission.gsi.gov.uk with the following information:

- Details of the individual making the report and their connection to the PLCF or CCO.
- Confirmation that the individual making the report has the authority to do so.
- Details of who in the Trustee Body is aware of the incident, for example, all or only the Chair.
- Details of the incident or allegation and when the PLCF or CCO first became aware of the issue.
- Details of what action has and/or is being taken to

deal with the incident or allegation.

- Details of what measures have and/or will be implemented to mitigate risk of recurrence.
- Details of whether and when the incident or allegation has been reported to statutory agencies and/or the Football Authorities or any other specialist/regulatory bodies.

Further information about all reportable incidents and how to report a serious incident can be found via the following webpage: www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity

Further guidance on safeguarding issues in charities can be found via the following webpage: www.gov.uk/government/publications/strategy-for-dealing-with-safeguarding-issues-in-charities

Data protection

We will maintain confidentiality of all; (i) data collected (in writing or electronically) relating to Children, Young People and Adults at Risk, (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.

Listening culture

We are committed to ensuring that safeguarding is person-led and outcome-focused. We will engage Children, Young People and Adults at Risk about how best to respond to their safeguarding situation in a way that enhances involvement, choice and control as well as improving wellbeing and safety.

We believe that Children, Young People and Adults at Risk have the right to be heard and involved in decisions that affect them. The Premier League and PLCF will always act in the best interests of Children, Young People and Adults at Risk and we will seek their views (and in the case of a Child/Young Person, 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.

Safer working practices

Good safeguarding practices protect everyone.

This section aims to inform Staff about practices that contribute to a safer culture and environment. Whilst every attempt has been made to cover a wide range of activities in this section, it is recognised that it cannot cover all eventualities.

Staff are expected to make judgements about their actions and behaviour to secure the best interests and safety of the Children, Young People and Adults at Risk in their care. All actions and behaviours should be guided by the principle that the safety and welfare of Children, Young People and Adults at Risk is paramount.

Maintaining professional boundaries

Working with Children, Young People and Adults at Risk may involve physical contact, such as medical intervention, responding to success or distress, preventing an injury or accident, sporting skills instruction or demonstrating the safe use of a piece of equipment.

There may be some roles where physical contact is commonplace and/or a requirement of the role, particularly in sports science or medicine. These tasks should only be undertaken by properly trained and qualified practitioners. This Policy does not seek to replace the specific guidance and codes of practice developed for those professionals.

Children, Young People and Adults at Risk 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. All supervision measures should be transparent, consistently applied and appropriate to the needs, age and capacity of those concerned.

Staff and Partners should never assist with personal care tasks that can be undertaken independently and any such assistance must form part of an agreed Premier League or PLCF care plan.

Engaging in sexual activity or an intimate relationship with a Child, Young Person or Adult at Risk with whom Staff and Partners come into contact through their role will be considered a breach of trust leading to a referral to the appropriate authorities. In some circumstances, such a breach may also constitute a criminal offence.

Sexual activity does not just constitute physical contact. It may also include non-contact activities, such as causing Children, Young People and Adults at Risk to engage in or watch sexual activity or producing pornographic material.

In all circumstances where a Child, Young Person or Adult at Risk initiates inappropriate contact, it is the responsibility of the member of Staff or Partner to sensitively deter them and help them understand the importance of personal boundaries. Should inappropriate contact be initiated by a Child, Young Person or Adult at Risk, then it must be recorded and reported to the Premier League Safeguarding Team.

In addition, if a member of Staff or a Partner believes their own actions could be misinterpreted or they observe an action or behaviour by another member of Staff or a Partner that could be considered to be inappropriate or possibly abusive, the incident and

circumstances should also be recorded and reported to the Premier League Safeguarding Team.

Communication

Good communication is central to working with Children, Young People and Adults at Risk, however all communication by whatever method should take place within professional boundaries. This includes the wider use of technology, for example, mobile phones, email and social media.

Staff and Partners are expected to:

- ✓ Build respectful and trusting relationships with Children, Young People and Adults at Risk.
- ✓ Only contact Children, Young People and Adults at Risk, for professional reasons and with the knowledge and agreement of the Premier League/PLCF.
- ✓ Maintain professional boundaries at all times.

Staff and Partners must never:

- ✗ Intimidate, threaten, coerce, exploit or undermine Children, Young People and Adults at Risk.
- ✗ Use offensive, abusive or inappropriate language.
- ✗ Share any personal information or contact details with Children, Young People and Adults at Risk.
- ✗ Request any personal information from Children, Young People and Adults at Risk without the knowledge and agreement of the Premier League/PLCF. The Premier League and PLCF must be aware of all personal data processed.

Creating a safe environment

We believe that the safety, welfare and enjoyment of Children, Young People and Adults at Risk should be a primary consideration during the planning, delivery and review of all our Activities.

These key considerations are not exhaustive, however they do give Staff and Partners a good framework to build from when planning and delivering Activities:

- Experience and suitability of the Staff and Partners involved.
- Assessing the suitability of partners and service providers and the adequacy of their safeguarding and safer recruitment policies and practices.
- 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 by competent Staff and Partners.
- Safe travel and transport arrangements.
- Ensuring that accommodation is in a safe location, is safely managed and is of good standard for security, hygiene and first aid.
- Emergency response procedures covering injury, illness, emergency evacuation, safeguarding concerns, missing persons, local services and emergency contacts including emergency consular assistance details when abroad.
- Ensuring that there is adequate insurance cover in place.
- Consent for participation, emergency medical treatment and the use of images/footage.
- Appropriate supervision arrangements and ratios.
- Ensuring that additional vulnerability and needs are carefully considered.
- Codes of conduct for Children, Young People and Adults at Risk, Staff and Partners and spectators.
- Procedures for dealing with challenging behaviour and bullying.
- Security and measures to manage the behaviour of spectators.
- Safe dispersal procedures.

Working together is an underpinning principle of safeguarding. Staff and Partners must consult with the Premier League Safeguarding Team at the early planning stages of all Activities for support and to ensure that safeguarding risks specific to each Activity are fully considered and appropriately managed prior to delivery.

Supervision and ratios

Staff and Partners are expected to provide appropriate supervision of the Children, Young People and Adults at Risk 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 Children, Young People and Adults at Risk participating.

- The competence and experience of Staff and Partners involved.
- The nature and duration of the Activity.
- Risk assessments and/or intelligence identifying potential behavioural or other issues and risks.

Staff and Partners must work with the Premier League Safeguarding Team when planning Activities to ensure that appropriate ratios and supervision arrangements are carefully considered.

Lone working and one-to-one situations

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

Staff and Partners responsibilities:

- ✓ Work in an open and transparent way and avoid conduct which could raise concern or place Children, Young People and Adults at Risk of harm.
- ✓ Under no circumstances should Staff and Partners visit Children, Young People and Adults at Risk in their homes outside agreed work arrangements. Nor should they invite Children, Young People and Adults at Risk to their own home or to that of a family member, colleague or friend.
- ✓ Ensure that contact by whatever means and meetings with Children, Young People and Adults at Risk outside agreed working arrangements never take place without the knowledge and agreement of the Premier League/PLCF.

Gifts, rewards and selection

Staff and Partners should exercise care when selecting Children, Young People and Adults at Risk for activities, privileges or rewards to avoid perceptions of favouritism or unfairness. Methods and criteria for selection should always be transparent and consistently applied with the knowledge and agreement of the Premier League/PLCF. Care should also be taken to ensure that Staff and Partners do not accept any gift that might be construed as a bribe by others or lead the giver to expect preferential treatment.

Behaviour management

Children, Young People and Adults at Risk have a right to be treated with respect and dignity at all times, even in circumstances where they display difficult or challenging behaviour.

Children, Young People and Adults at Risk must never be subject to any form of treatment that is harmful, abusive, humiliating or degrading.

All measures for dealing with difficult or challenging behaviour must be deployed with the knowledge and agreement of the Premier League/PLCF.

Children and Young People: Parents/guardians of Children and Young People should be informed where behaviour management measures are deployed.

Adults at Risk: Carers may be informed, where appropriate, with the consent of the Adult at Risk.

Photography and video footage

Photography and video footage includes the taking of still photographs, filmed and moving images and video recordings by whatever means.

We will ensure that photography and video footage is only be taken and used where it is necessary and legitimate to do so and with the appropriate consent.

Staff and Partners must work with the Premier League Safeguarding and Legal Teams when planning for the taking and use of photographs and video footage to ensure that our Safeguarding and Data Protection Policies are adhere to.

Staff and Partners must never:

- ✗ Take, display or distribute photographs or video footage of Children, Young People and Adults at Risk without the knowledge and agreement of the Premier League/PLCF.
- ✗ Share photographs or video footage of the Children, Young People and Adults at Risk their role brings you into contact with on private social or professional media accounts, for example, Instagram, Facebook or LinkedIn.

Transport

It is not appropriate for Staff and Partners to transport Children, Young People and Adults at Risk outside of their normal working duties. Any occasion where a Child, Young Person or Adult at Risk requires transport in an emergency situation or where not

to give a lift may place them at risk of harm, must be immediately reported to the Premier League Safeguarding Team. In the case of a child, parent/legal guardian consent should also be sought where possible.

Staff and Partners responsibilities:

- ✓ Only transport Children, Young People and Adults at Risk if it is part of your role and responsibilities. Staff and Partners must ensure that emergency arrangements are justified, reported and recorded.
- ✓ The safety and welfare of Children, Young People and Adults at Risk must underpin Staff and Partners behaviour and actions.
- ✓ Ensure that the vehicle is roadworthy, appropriately insured and that the maximum capacity is not exceeded.
- ✓ Ensure that all arrangements for vehicle, passenger and driver safety are in place, including appropriate licence and insurance documents.
- ✓ Staff and Partners must be fit to drive and free from any drugs, alcohol or medication that is likely to impair their judgement or ability to drive.
- ✓ Children, Young People and Adults at Risk should occupy the back seats.
- ✓ Ensure seatbelts are working and are always used.

First aid and administration of medication

In circumstances where a Child, Young Person or Adult at Risk needs medication regularly, a Premier League or PLCF health care plan should be established to ensure the safety and protection of Children, Young People and Adults at Risk and the Staff and Partners who are working with them.

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

Children and Young People: Parents/legal 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.

Appendices

Appendix 1: Possible signs and indicators of abuse, bullying and other safeguarding concerns

The possible signs and indicators detailed in this Appendix are not exhaustive, however they can assist in identifying abuse, bullying and other safeguarding concerns.

Common signs and indicators of abuse and bullying

- Losing interest or dropping out of positive activities or activities they once enjoyed
- Subdued or changed behaviour in the presence of a particular individual(s)
- Changes in eating habits or developing an eating problem
- Sudden weight change
- Sudden changes in behaviour
- Sudden changes in performance
- Not being able to concentrate or focus
- Alcohol and/or substance misuse
- Isolation from family, peers and/or social networks
- Self-harm or suicide attempts
- Becoming withdrawn
- Depression
- Anxiety
- Sleep disorders

Physical abuse

- Unexplained marks, injuries, burns or scalds, bite marks, loss of hair in clumps, broken or fractured bones
- Recurrent injuries
- A history of unexplained falls, or minor injuries
- Inconsistent accounts for the cause of injuries
- Injuries not consistent with the explanation given for them

- Untreated injuries
- Injuries found at different states of healing
- Injury shape similar to an object
- Refusal to discuss injuries
- Arms and legs kept covered in hot weather
- Fear of medical help
- Delays in physical development
- Drowsiness due to too much medication or lack of medication

Emotional abuse

- Isolation
- Fear of making mistakes
- Over meticulous
- Becoming withdrawn, agitated and/or anxious
- Tearfulness
- Unexplained paranoia or excessive fears
- Low self-esteem
- Struggling to control their emotions
- Have difficulty making or maintaining relationships
- Lack of growth or development
- Unexplained speech disorders
- Lack social skills
- Having few or no friends
- Acting or dressing inappropriate for age, gender and/or culture

Sexual abuse

- Genital and stomach pain, itching, bruising, discharge and bleeding, pregnancy, incontinence, repeated urinary infections and sexually-transmitted infections

- Difficulty walking or sitting
- Having inappropriate knowledge of sexual behaviour for their age
- A preoccupation with anything sexual
- Inappropriate or unusual changes in the way affection is shown
- Displaying inappropriate sexualised behaviour, such as dressing in a sexualised manner or sending sexualised images by mobile phone (“sexting”)
- Having nightmares
- Bed-wetting
- Being found out-of-area
- Starting to use new or unknown slang words
- Starting to adopt certain codes of group behaviour e.g. ways of talking and hand signs
- Unexplained physical injuries, and/or refusal to seek or receive medical treatment for injuries
- Excessive receipt of texts and/or phone calls
- Graffiti style ‘tags’ on possession
- Constantly talking about another person who seems to have a lot of influence over them
- Breaking contact with old friends and hanging around with one group of people

Child Sexual Exploitation

- Unexplained gifts, money or possessions they can’t or won’t explain
- Going missing for periods of time or regularly returning home late
- Skipping school or being disruptive
- Genital and stomach pain, itching, bruising, discharge and bleeding, pregnancy, incontinence, repeated urinary infections and sexually-transmitted infections
- Having inappropriate knowledge of sexual behaviour for their age
- A preoccupation with anything sexual
- Inappropriate or unusual changes in the way affection is shown
- Being frightened of certain people, places or situations
- Being secretive
- Sudden changes in their appearance and wearing more revealing clothes
- Signs of unexplained physical harm, such as bruising and cigarette burns
- Gang association
- Associating with known or suspected gang members, closeness to siblings or individuals in the family who are gang members
- Expressing aggressive or intimidating views towards other groups of, some of whom may have been friends in the past
- Being frightened of certain people, places or situations
- Relationships with controlling individuals or groups
- Carrying weapons

Cuckooing

- An increase in people entering and leaving their property
- An increase in cars or bikes outside the property
- Increasing litter outside the property
- Possible increase in anti-social behaviour
- Signs of drugs use
- Lack of healthcare visitors
- Change in mood and/or demeanour, for example, being secretive, becoming withdrawn, aggressive or emotional
- Unexplained, sometimes unaffordable new things
- Unexplained injuries
- Substance misuse and/or drug paraphernalia

County lines

- Unexplained gifts, money or possessions they can’t or won’t explain
- Going missing for periods of time or regularly returning home late
- Persistently going missing from school or home

Neglect

- Poor hygiene
- Looking unkempt
- Being smelly or dirty
- Frequent tiredness
- Being hungry or not given money for food
- Malnutrition
- Having unwashed clothes
- Ill-fitting or inappropriate clothing such as no warm clothes in winter
- Stealing food and/or money
- Being left alone for a long time
- Being withdrawn, depressed or anxious
- Finding it hard to concentrate or take part in activities
- Untreated injuries and medical problems
- Parents or carers absent or unsupportive or disengaged

Grooming

- Being very secretive about how they're spending their time, including when online
- Isolation – not seeing friends and family
- Having money or new things like clothes and mobile phones that they can't or won't explain
- Being upset, withdrawn or distressed
- Sexualised behaviour, language or an understanding of sex that's not appropriate for their age, understanding and/or culture
- Spending more time away from home or going missing for periods of time
- They start talking about a new friend, girlfriend, boyfriend or partner and it's not clear who they are or how they met them
- A child having an older boyfriend or girlfriend
- Underage drinking or drug taking

Grooming can also lead to radicalisation.

Radicalisation

Vulnerability

- Identity crisis - Distance from cultural or religious heritage and uncomfortable with their place in the society around them
- Personal crisis - Family tensions or trauma, sense of isolation, adolescence, low self-esteem, disassociating from existing friendship group and becoming involved with a new and different group of friends, searching for answers to questions about identity, faith and seeking a sense of belonging
- Personal circumstances - Migration, local community tensions, events affecting country or region of origin, alienation from UK values, having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy
- Unmet aspirations - Perceptions of injustice, feeling of failure, rejection of civic life
- Criminality - Experiences of imprisonment, poor resettlement or reintegration or previous involvement with criminal groups
- Experience of poverty, disadvantage, discrimination or social exclusion
- Learning difficulties and mental health support needs
- Experienced personal trauma, particularly any trauma associated with war or sectarian conflict

Behaviours

- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues
- Significant shift in behaviour or outward appearance that suggests a new social, political, or religious influence
- Conflict with family over religious beliefs, lifestyle or dress choices
- Vocal support for terrorist attacks (either verbally or written)
- Witnessed or been the perpetrator or victim of racial or religious hate crime

- Travel for extended periods of time to international locations known to be associated with extremism
- Change in emotional behaviour, for example, becoming withdrawn or angry
- Sharing of views or trying to influence others with extremist ideology
- Ignoring or demonising viewpoints that contradict their own
- Expressing themselves in an 'us vs. them' manner about others who have alternative beliefs
- Increasingly secretive or unwilling to discuss views
- Changing their circle of friends
- Losing interest in activities they once enjoyed
- Becoming socially withdrawn or spending a lot of time online
- Secretive about who they talk to online and which websites they visit
- Belief in conspiracy theories and distrust of mainstream media
- Justifying the use of violence or expressing a desire for revenge

Access to extremism/extremist influences

- Association with extremist groups, associates or family engaging in extremist activity
- Accessing the internet for the purpose of extremist activity, for example, use of closed network groups, access to or distribution of extremist material, contact associates covertly via online measures, for example, Skype and email
- Possesses or is actively seeking to possess and/or distribute extremist literature or other media material likely to incite racial, religious hatred or acts of violence.
- Support for groups with links to extremist activity, for example, propaganda distribution, fundraising and attendance at meetings
- Extremist ideological, political or religious influence from within or outside UK

FGM

- Difficulty walking, sitting or standing
- Spending longer than normal in the bathroom or toilet
- difficulties urinating or incontinence
- Unusual behaviour after a lengthy absence
- Reluctance to undergo normal medical examinations
- Asking for help, but may not be explicit about the problem due to embarrassment or fear

Possible warning signs that FGM might be about to take place are:

- A planned summer trip to a country known to practise FGM
- Talk about visiting relatives for a special procedure, ceremony or event
- Mention of a female relative coming to visit
- Asking for help from a trusted adult if she feels at risk of danger
- Referencing FGM, female circumcision, cutting or it's other alternative names listed in the National FGM Centre's guidance: <http://nationalfgmcentre.org.uk/wp-content/uploads/2018/02/FGM-Terminology-for-Website.pdf>
- A holiday that includes additional time away before, or at the end of, the summer holidays, encroaching on school time
- The family making preparations to take the girl abroad 'on holiday' e.g. arranging vaccinations or requesting a prolonged absence from school

Bullying

- Sudden loss of friends or avoidance of social situations
- Being frightened of certain people, places or situations
- Unexplainable injuries
- Lost or destroyed clothing or property
- Frequent headaches or stomach aches, feeling sick or faking illness

- Changes in eating habits, like suddenly skipping meals or binge eating.
- Difficulty sleeping or frequent nightmares
- Declining grades, loss of interest in schoolwork, or not wanting to go to school
- Sudden loss of friends or avoidance of social situations
- Feelings of helplessness or decreased self-esteem

Domestic violence

Witness to domestic abuse

- Aggression or bullying
- Anti-social behaviour, like vandalism
- Anxiety, depression or suicidal thoughts
- Attention seeking
- Bed-wetting, nightmares or insomnia
- Constant or regular sickness, like colds, headaches and mouth ulcers

Victim of domestic abuse

- Low self-esteem
- Physical evidence of violence such as bruising, cuts, broken bones
- Exhibits excessive privacy concerning their personal life or the person with whom they're in a relationship
- Verbal abuse and humiliation by their partner in front of others
- Feeling anxious and stressed in their partner's presence
- Fear of outside intervention
- Damage to home or property
- Isolation – not seeing friends and family
- Limited access to money

Online grooming, bullying and abuse

If someone is being or has been groomed or abused online, they might:

- Spending more or less time online or on their devices
- Spend a lot more or a lot less time than usual online, texting, gaming or using social media
- Seem distant, upset or angry after using the internet or texting
- Be secretive about who they're talking to and what they're doing online or on their mobile phone
- Have lots of new phone numbers, texts or email addresses on their mobile phone, laptop or tablet
- Appear controlled by their phone
- Switch to a new screen when someone comes near the computer
- Upset or frustrated after going online or gaming

Abuse specific to adults at risk

Financial or material signs

- Being unable to afford a new kit, appear to be hungry or mention being unable to bills
- Unexplained lack of money or inability to maintain lifestyle
- Disparity between assets and satisfactory living conditions
- Signs of financial hardship in cases where the person's financial affairs are being managed by a court appointed deputy, attorney or LPA
- Extraordinary interest by family members and other people in the person's assets
- The person allocated to manage financial affairs is evasive or uncooperative
- Recent changes in deeds or title to property
- Rent arrears and eviction notices
- Unnecessary property repairs

Modern slavery

- Signs of physical or emotional abuse
- Appearing to be malnourished, unkempt or withdrawn
- Isolation from the community, seeming under the control or influence of others

- Living in dirty, cramped or overcrowded accommodation and or living and working at the same address
- Working very long hours and has no money
- Lack of personal effects or identification documents
- Always wearing the same clothes
- Avoidance of eye contact, appearing frightened or hesitant to talk to strangers
- Fear of law enforcers
- Inappropriate or inadequate clothing
- Inadequate diet
- Unexplained weight loss, or other signs of malnutrition
- Untreated injuries or medical problems
- Need for dental care not being met
- Failure to be given personal hygiene
- Poor personal hygiene

Examples of self-neglect include:

Organisational or institutional abuse

- Failure to respond to abuse appropriately
- Failure to respond to complaints appropriately
- Insufficient staff or high turnover resulting in poor quality care
- Persistently failing to their needs
- Authoritarian management or rigid regimes
- Lack of choices in their home or care setting, for example, having to go to bed at a certain time
- Not offering choice or promoting independence
- Misuse of medication
- Discouraging visits or the involvement of relatives or friends
- Inappropriate use of restraints
- Lack of respect for dignity and privacy
- Not providing adequate food and drink, or assistance with eating
- Failure to provide care with dentures, spectacles or hearing aids
- Not taking account of individuals' cultural, religious or ethnic needs
- Interference with personal correspondence or communication
- A refusal or inability to cater for basic needs, including personal hygiene and appropriate clothing
- Neglecting to seek assistance for medical issues
- Not attending to living conditions – letting rubbish accumulate in the garden, or dirt to accumulate in the house
- Hoarding items or animals

Neglect and acts of omission

- Poor physical condition
- Dirty kit
- Clothing in poor condition

Appendix 2: Safeguarding Referral Form

1. Person(s) whose safety and/or welfare there are concerns about

Please provide known details of the alleged victim(s)/person(s) whose safety and/or welfare there are concerns about

| | |
|--|--|
| Forename and surname | |
| Date of birth/estimated age: | |
| Relationship to the Premier League/PLCF: | |

In the case of a child, please provide their parent's/legal guardian's contact details below

| | |
|----------------|--|
| Email address: | |
| Contact number | |
| Address: | |

Please use a continuation sheet for details of additional persons

2. Details of the person(s) whose actions or behaviour there are concerns about

Please provide known details of the alleged perpetrator(s) of abuse/person(s) whose actions or behaviour there are concerns about

| | |
|--|--|
| Forename and surname | |
| Date of birth/estimated age: | |
| Relationship to the Premier League/PLCF: | |
| Other known roles with children and/or adults at risk: | |
| FAN number: | |

In the case of a child, please provide their parent's/legal guardian's contact details below

| | |
|----------------------|--|
| Forename and surname | |
| Contact number: | |
| Address: | |

Please use a continuation sheet for details of additional persons

3. Details of any witnesses

Please provide known details of any witnesses to the incident

| | |
|--|--|
| Forename and surname | |
| Date of birth/estimated age: | |
| Relationship to the Premier League/PLCF: | |

In the case of a child, please provide their parent's/legal guardian's contact details below

| | |
|----------------|--|
| Email address: | |
| Contact number | |
| Address: | |

Please use a continuation sheet for details of additional witnesses

4. Details of the disclosure, incident or concern

Please provide the time, date and location of the disclosure, incident or concern using a continuation sheet if necessary

| | |
|-----------|--|
| Date: | |
| Time: | |
| Location: | |

Please provide:

- A factual account rather than assumption of what you have witnessed or been told
- Clear, concise and relevant information

| |
|--|
| |
| |
| |
| |

6. Details of the person completing this form

| | |
|--|--|
| Forename and surname | |
| Relationship to the Premier League/PLCF: | |
| Email address: | |
| Contact number: | |
| Address: | |
| Date: | |

If you are making this referral on behalf of someone else who has reported information to you, please provide their details

| | |
|--|--|
| Forename and surname | |
| Relationship to the Premier League/PLCF: | |
| Email address: | |
| Contact number: | |
| Address: | |

Premier League Safeguarding Team

Jess Addicott
Premier League Head of Safeguarding
T: 020 7864 9173
E: safeguarding@premierleague.com

External Safeguarding Contacts



The Football Association Safeguarding Team

T: 0800 169 1863 ask to speak to a member of the Safeguarding Team
(during office hours Mon-Fri excluding bank holidays)
E: safeguarding@thefa.com

POLICE 101 (or 999 in an emergency)

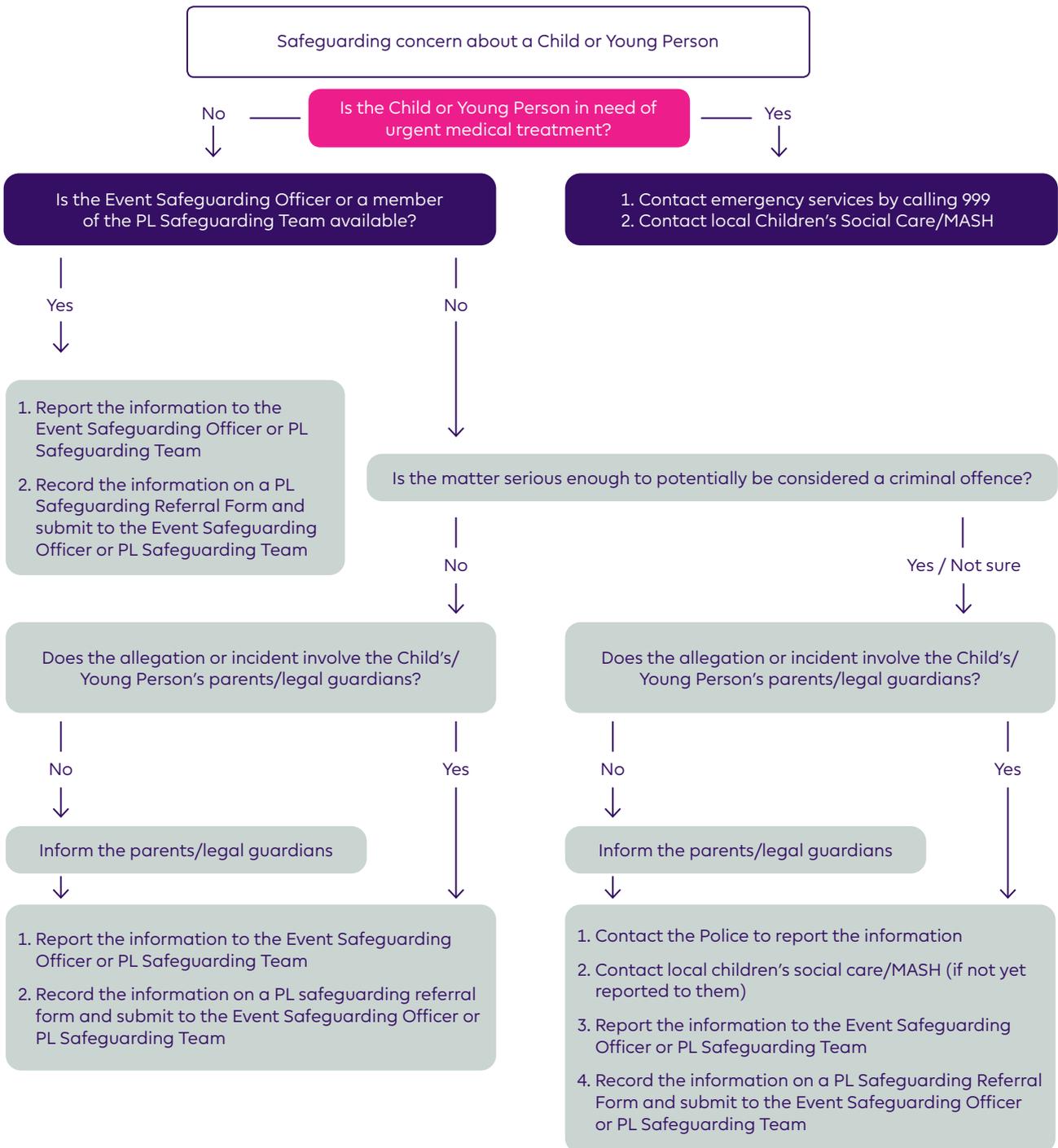
NSPCC 24-hour safeguarding children advice helpline 0808 800 5000

ann craft trust Safeguarding adults advice helpline 0115 951 5400
acting against abuse

Appendix 3: Responding to safeguarding concerns

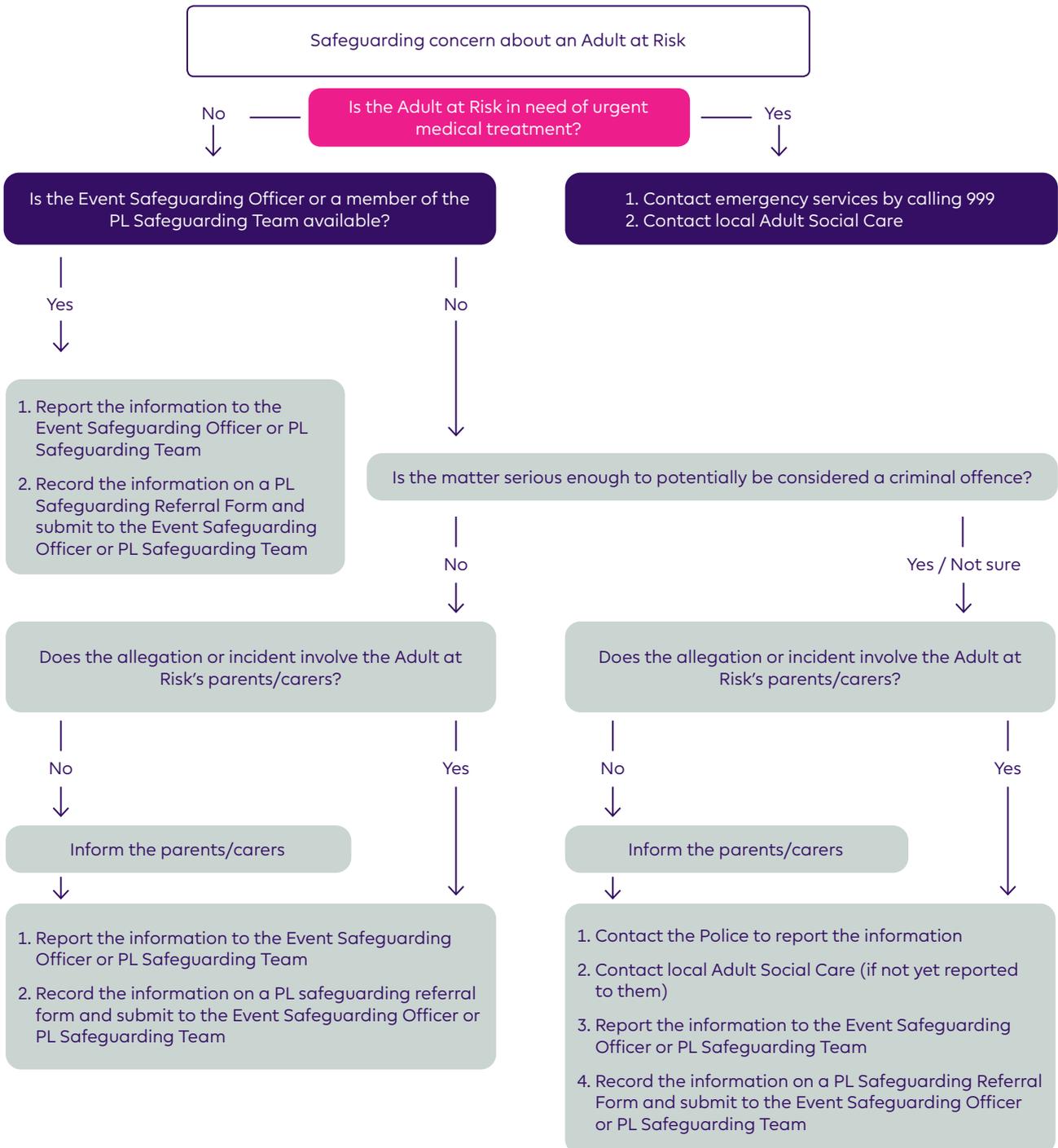
Flowchart 1 – Children and Young People

The flowcharts in Appendix 3 aim to support Staff and Partners when dealing with a disclosure, safeguarding incident or allegation



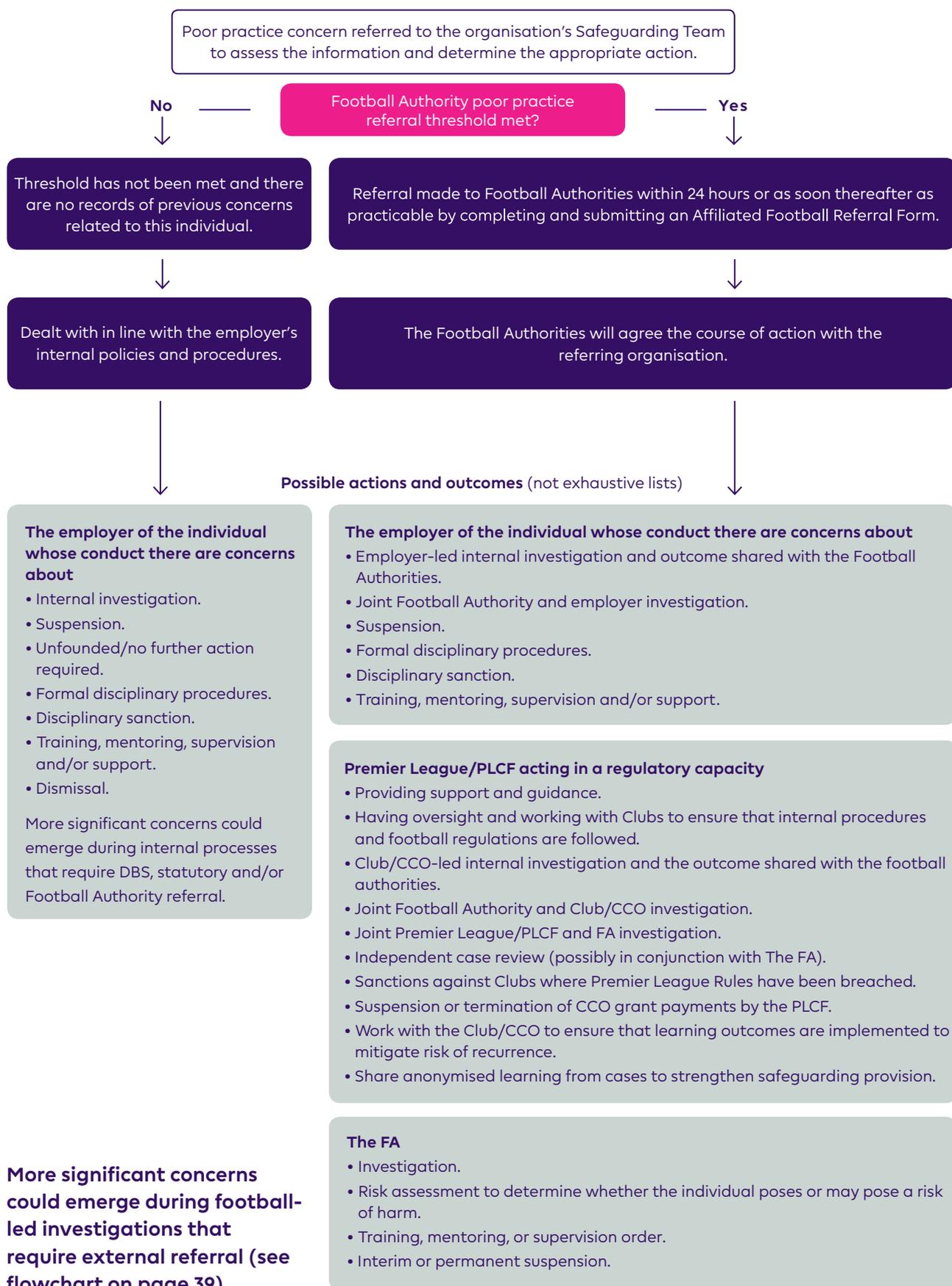
Appendix 3: Responding to safeguarding concerns

Flowchart 2 – Adults at Risk



Appendix 4: Flowcharts – Stakeholder roles and procedures

Flowchart 1 – Low level poor practice concern



Flowchart 2 – Serious poor practice, abuse or criminal offence

Information referred to the organisation's Safeguarding Team to assess the information and determine the appropriate action.

Note: Any individual can contact emergency services and/or make a referral directly to statutory agencies if they are concerned about a Child's or Adult at Risk's immediate safety. The organisation's Safeguarding Team should be informed as soon as practicable after such referral is made.

Referral to the appropriate statutory agencies where thresholds are met.

Referral made to Football Authorities within 24 hours or as soon thereafter as practicable by completing and submitting an Affiliated Football Referral Form.

Possible actions and outcomes (not exhaustive lists)

Statutory authorities

- Multi-agency strategy meeting.
- Criminal investigation/proceedings.
- Local Authority investigation.
- A joint Police and Local Authority investigation.
- Care or protection orders issued.
- Statutory authorities determine that their thresholds have not been met or that there is insufficient evidence. The concern is referred back to manage in line with football policies, procedures and regulations (see process in flowchart on page 38).

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

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.
- Joint Football Authority and employer investigation.
- Suspension.
- Formal disciplinary procedures.
- Disciplinary sanction.
- Training, mentoring, supervision and/or support.
- Dismissal.
- Providing 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).

The FA

- Participation 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/PLCF 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/CCO-led internal investigation and the outcome shared with the football authorities.
- Joint Football Authority and Club/CCO investigation.
- Joint Premier League/PLCF and FA investigation.
- Independent case review (possibly in conjunction with The FA).
- Sanctions against Clubs where Premier League Rules have been breached.
- Suspension or termination of CCO grant payments by the PLCF.
- Participation in multi-agency strategy meetings.
- Work with Clubs to implement agreed multi-agency strategy meeting actions.
- Work with the Club/CCO to ensure that learning outcomes are implemented to mitigate risk of recurrence.
- Share anonymised learning from cases to strengthen safeguarding provision.

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