

Wolverhampton Wanderers FC

SAFEGUARDING





Safeguarding Policy Statement

At Wolves we want our children and young people to be happy and safe.

We strive to ensure that children and young people are treated with respect, we are committed to hearing their voices and we want to create a positive environment that is supportive, warm and welcoming.

Through the application of this policy and a commitment to best practice we pride ourselves that safeguarding runs prominently and proudly throughout our pack.

What is Safeguarding?

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

Safeguarding means:

- Protecting children from abuse and maltreatment.
- Preventing harm to children's health or development.
- Ensuring children grow up with the provision of safe and effective care.
- Acting to ensure all children and young people to have the best outcomes.

Our Policies are driven by a commitment to Childrens Rights and we believe that:

- Children and young people should never experience abuse of any kind.
- We have a responsibility to promote the welfare of all children and young people, to keep them safe and to practice in a way that protects them.

We recognise that:

The welfare of children is paramount in all the work we do and in all the decisions we take. All children, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm or abuse. Some children may have additional vulnerabilities because of the impact of previous experiences, their level of dependency, communication needs or other issues. We will work in partnership with children, young people, their parents, carers and other agencies in order to promote children and young people's welfare.

Safeguarding Framework

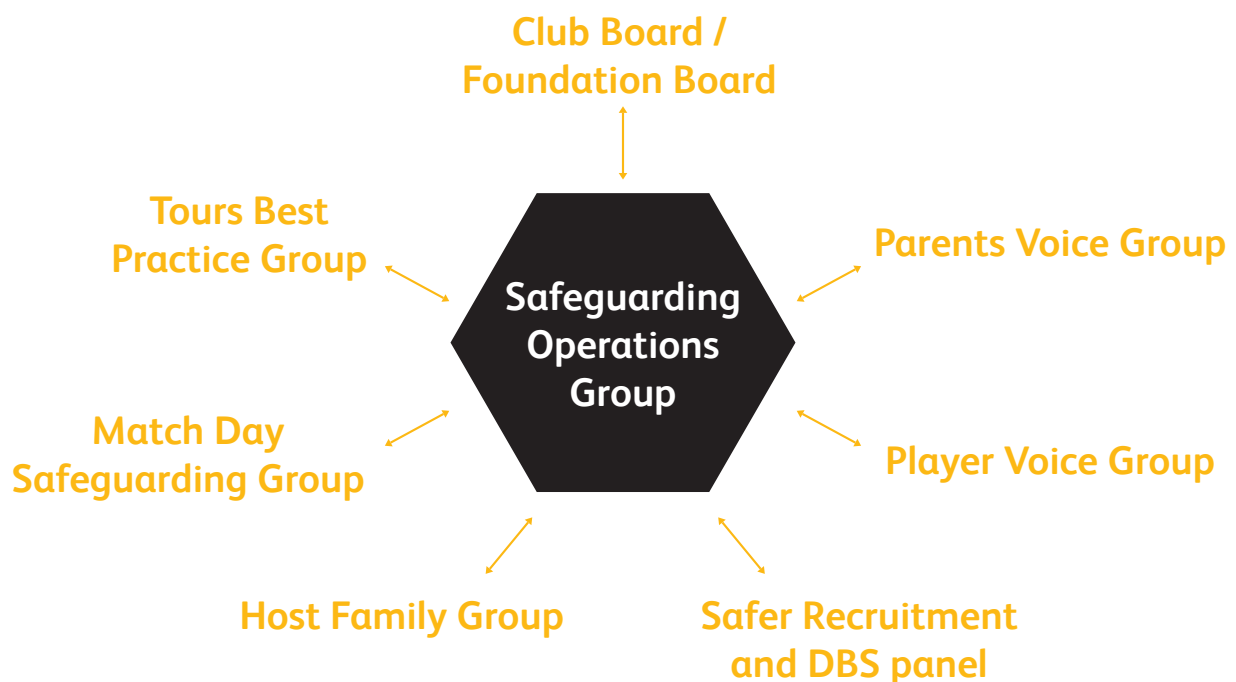
At Wolves we have a dedicated Head of Safeguarding and several Designated Safeguarding Leads across our Foundation, Academy and Molineux.

This document will share what we believe to be our standards for best practice and evidence our safeguarding commitment to protecting children and young people who we work with, work alongside and are in contact with.

We review our policies at the end of each season and we would like to thank Wolverhampton Social Services for their support with this. We have monthly safeguarding operations meetings and we also have several 'sub groups' dedicated to discussing safeguarding across all areas of our club.

'We believe in being responsive to safeguarding updates in line with current local and national safeguarding trends and priorities and believe a flexible approach creates proactive practice'

Lisa Carter – Head of Safeguarding



Safer Recruitment and Disclosure

The club recognises the importance of safe recruitment and has considered the government guidance in Keeping Children Safe in Education 2018 and the FA's Responsible Recruitment guidelines to ensure there is a safe and responsible recruitment process for all individuals within the club who come into contact with children and young people. This applies whether in a paid or voluntary capacity.

The club's safe recruitment process includes:

- Monthly practitioners panel chaired by Head of HR to discuss key issues and best practice.
- A commitment to ensuring job descriptions and job advertisements highlight the key responsibilities of the role and the club's commitment to safeguarding.
- Applications must be in writing; the club will then shortlist and interview as appropriate for the role.
- Each candidate will be interviewed by at least two members of staff prior to any offer and interviews questions will include dedicated safeguarding questions.
- Ensuring all applicants identity, qualifications and experience are verified through original documentation and any gaps in CVs will be properly explored.
- Those working with children will need two written references including an express request of details of any safeguarding matters recording by previous employers to ensure the fulfilment of the club's commitment to the ongoing safeguarding of children.
- All roles or positions will require satisfactory references and criminal record checks under the Disclosure & Barring Service (DBS) appropriate to the role concerned.

A person shall not commence work until such time that all background checks and references are completed and deemed to be acceptable by the club.

The club also requires all agency staff and consultants working with children to sign a self-declaration form. This requires employees to declare any criminal history they may have. Consultants and agency staff who undertake a regulated activity with children must have a valid enhanced DBS. This will need to be verified through the DBS number and date of issue.

If a person's criminal record check reveals cautions, convictions, community resolutions, warnings or final reprimands, the club will consider the nature of the offence/offences in deciding if the person is unsuitable for working with children and young people. The club will conduct a risk assessment to evaluate the information and the person may be required to attend a risk assessment meeting with the Head of HR prior to any recruitment decision being made.

Our Host Families have an important role in caring for and looking after our young players. We have a dedicated policy and procedures to ensure best practice is followed. We work closely with our local authority to ensure complete compliancy and for our under 16s we follow private foster care arrangements.

Induction and training

During the induction process, all staff are made aware of their safeguarding responsibilities and are introduced to the Head of Safeguarding and made aware of how to access ongoing support, advice and guidance. Employees will also receive copies of the Premier League safer working practice. Staff are also required to complete an E learning introduction to safeguarding or an equivalent. Access to safeguarding training is made available through local sources, the Premier League and an internal bespoke training programme.

Abuse

Safeguarding and child abuse are sometimes mentioned together, however child abuse is defined as the maltreatment of a child. Abuse or neglect can be somebody directly inflicting harm on a child, but it can equally arise by failing to act to prevent the harm of the child. Child abuse can arise in various settings including in the family home, institutional or community settings or via the internet. It can be perpetrated by an adult, or another child, known or unknown to the victim. The main areas of abuse are physical, emotional, neglect and sexual mistreatment. Other areas of abuse include child sexual exploitation, peer on peer abuse, female genital mutilation, youth produced sexual imagery and radicalisation. The club is aware of its additional responsibilities for example our PREVENT duty and this policy can be found separately.

Good robust safeguarding policies and procedures can help develop a safe environment where risk is minimised and children and young people are able to approach trusted adults and share worries and concerns. We believe the best way to protect children and young people is to foster an environment whereby the children or young people are key to shaping practice.

What is good practice?

Recognise that you are in a position of power – the Wolves badge is powerful, and we want you to take that seriously and appreciate your responsibility.



- Be a role model, displaying consistently high standards of behaviour and appearance (disciplined/committed/time keeping).
- Always use language that is child appropriate and socially acceptable.
- Always work in an open environment. You should avoid unnecessary private situations and discourage secrets and/or closed communications.
- Make the experience of the sporting activity fun and enjoyable for all involved. In doing this, you should promote fairness and confront and manage any bullying.
- Be familiar with Wolves Anti Bullying Policy and ensure that children and young people know how to raise concerns or worries.
- Treat all children and young people equally and with respect and dignity.
- Always put the welfare of the child or young person first.
- Avoid unnecessary physical contact and maintain a safe and appropriate distance with children and young people.
- Where any form of manual/physical support is required it should be provided in an open environment and with the consent of the child or young person. Physical contact can be appropriate and, sometimes a necessary part of training. However, it must be neither intrusive nor disturbing and the child or young person's consent must be obtained prior to the contact.
- Where supervising groups of children or young people in changing rooms, always ensure staff members work in pairs.

- Written parental consent is required if club officials are required to transport children and young people or for any significant travel arrangements e.g. tours/overnight stays.
- There must always be a qualified first aider present or readily available.
- Whilst at away events, adults should not unnecessarily enter a child or young person's room and they should never invite children or young people into their own room.
- When providing feedback to children and young people, make sure it is constructive and encouraging as opposed to negative criticism.
- Where the club acts in loco parentis, secure written consent from parents and guardians for the administration of emergency medical treatment and first aid.
- Ensure that a written record is kept of any incidents or injuries that occur. This record should include details of the incident, any action taken, and any treatment given.
- Ensure all communication with persons under 18 is conducted with parental consent. Any text messages or social media contact with children or young people must be for the sole purpose of facilitating arrangements and should always be made using the business mobile telephone provided. It is better practice to jointly communicate with the parent or guardian and child.

Poor Practice

It is important to recognise and be self-aware of your own practice if you feel you are 'drifting' towards poor practice. Seek training, raise with your manager and ask for support. Be mindful of colleague's behaviour and make it your responsibility to 'call out' any practice which displays any of the following behaviours.

- Taking insufficient care to avoid injuries. For example, by excessive training or inappropriate training for the age, maturity, experience and ability of players.
- Allowing abusive or concerning practices, allegations or disclosures to go unreported or not acted upon. If you have reported the matter to the relevant person within the club and it has not been dealt with correctly, consult the procedures in this document.

- Spending unnecessary amounts of time alone with children and young people away from others.
- Being alone in changing rooms, toilet facilities or showers used by children and young people.
- Take a child or young person alone in a car unless consent has been obtained a safeguarding designated lead or Head of Safeguarding in an emergency.
- Taking children or young people to your home or any location where they will be alone with you.
- Sharing a room with a child or young person if at an overnight stay or tour.
- Engaging in rough, physical or sexually provocative games of any type, even those which you may consider to be simply 'horseplay' or 'banter'. This is never appropriate and should be avoided.
- Encouraging, allow or engage in inappropriate touching of any form.
- Placing children in potentially compromising and uncomfortable situations with adults (e.g. inappropriate use by a coach/ staff member of social media with a young player).
- Allowing children or young people to use inappropriate language or action without being challenged or corrected.
- Making sexually suggestive comments to a child or young person.
- Doing things of a personal nature that the child or young person can do for themselves.
- Ignoring health and safety guidelines as this will subject children to unnecessary risks. (e.g. allowing young players to set up goalposts unsupervised by adults).
- Giving continued and unnecessary preferential treatment to individuals.

Please note that both lists are not exhaustive but merely providing examples of the types of behaviour you should promote or challenge and avoid.

Whistleblowing Policy

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

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

Whistleblowing is dealt in full in the club's whistleblowing policy, and you can find this on our intranet. If unable to raise concerns internally, please consult the NSPCC Whistleblowing Helpline on 0800 028 0285.

The club has a dedicated policy for dealing with and investigating any allegations of historical abuse.

We are committed to hearing the voices and experiences of anyone that comes forward to share allegations and we will support all identified victims.

Lost or missing children and young people

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

If the child or young person is not located within a reasonable amount of time, the club will contact the child's parents or carers and agree with them to contact the police. If the parents or carers are not available, the club will call the police directly.

A record will be kept by a designated Safeguarding Lead of any instances in which a child or young person goes missing whilst engaging in club activities including any action taken by the club and the eventual outcome.

Searching children and young people

In order to ensure the safety and security of all club activities, it may be that a child or young person is subjected to the club's search process. In such instances, the preferred approach is that children and young people self-search under the supervision of the steward or security member. However, if concerns remain that the child or young person is concealing an item then consent will be sought from the parent or carer before the steward or security member conducts a search on the child while a supervisor observes. Stewards will not search any under 14s however we can ask for Police to carry out a search if we have concerns.

Use of photography and film

The club takes guidance on the use of images from the guidelines issued by the FA and the EFL. Club officials who take images will have been briefed by a member of the Safeguarding Team or by the Media and Communications Team. Prior to any images being taken of children, consent will be sought from parents and carers at the start of the season each year.

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

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

Social Media

The club recognise the positive benefits of the use of social media. However, it is also aware of the potential safeguarding risks of children and young people in engaging with social media platforms. Our social media team is available to offer support and guidance and we ensure that we take advice and our lead from practice and guidance from The FA and Premier League.

Sharing information

The club is committed to the sharing of information to protect children, in line with Working Together 2018, the Data Protection Act 1998 and General Data Protection Act 2018.

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

1. Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.

4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up to date, is shared in a timely fashion, and is shared securely.
7. Keep a record of your decision and the reasons for it –whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

Referrals and Confidentiality

Where a safeguarding concern about a child or young person arises, the club may refer these concerns to statutory and other external agencies. Any information that is shared will be done so on a strictly need to know basis. This includes:

- The relevant Designated Safeguarding Lead and the Head of Safeguarding
- The parent or carer of the child or young person who is alleged to have been abused.
- The person who made the allegation.
- If appropriate, statutory agencies, such as the police or children's social services.
- If appropriate, external agencies, such as the FA and the Premier League.

Support for Employees

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

Review

The club will review this policy to ensure ongoing compliance with safeguarding requirements. This will occur formally at the end of every season and we have established a dedicated group of external professionals led by our local LADO Officer. We will review internally if there is a change in legislation, guidance, governing body rules or a major safeguarding incident. We operate a policy of ongoing review and will always amend policies and approaches if we feel this is the best interests of children and young people.

What action should you take if you receive a safeguarding disclosure from a child or young person?

If a child or young person informs you directly about their concerns about someone's behaviour towards them, **this is a disclosure**.

This is often very difficult for a child or young person to make – they have chosen you because you are a trusted adult and they want you to do something.

If a child or a young person ever asked if you can keep something they say confidential it's important to make sure you reassure them that while you won't share anything unnecessarily you can't promise not to share and if you think they might be in danger or someone is hurting them or someone else you **ALWAYS** have to share.

Step 1

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

In order to do this, you **should**:

- Put aside your own feelings and emotions and listen calmly, even if the information is upsetting or shocking.
- Allow the child to speak freely and try not to interrupt them as this may disrupt the discussion and lead them to feel like they are being interrogated.
- Do not worry if there are silences, let the child speak at their own pace and lead the discussion.
- Do not challenge any of the information disclosed by the child.
- Try to avoid any accusatory or leading questions, let the child tell their own story of events without pushing any information. Do not ask any questions that may make the child feel guilty or ashamed.

- Tell the child that you recognise how difficult the disclosure may be to them and reassure them that they are doing the right thing and you are taking it seriously.
- If physical abuse has taken place, you may observe any visible marks or bruises, but do not ask a child to remove or adjust clothing in order to observe them.
- Tell the child who you will be informing of the disclosure whilst emphasising that you will support them through the process.
- Respect the confidentiality of the disclosure by only informing those who need to know. Those who need to know are the people who have a role to play in protecting the child.

You **should not**:

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

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

Guilt - it is possible they will blame themselves for the abuse and feel guilty about disclosing.

Ashamed - they may feel ashamed about the abuse itself or what their friends and family may think.

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

Scared - they may be fearful of the repercussions of disclosing the abuse or of the alleged abuse.

Step 2

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

The Head of Safeguarding should be informed and information recorded on MyConcern. Any original documentation must be passed stored securely.

What happens next?

You should be informed what has happened following the report. If you do not receive this information, you should be proactive in seeking it out because it is everyone's responsibility to ensure that concerns are followed up.

If you have a concern that the disclosure has not been appropriately acted upon, you can inform the Head of Legal who directly line manages the Head of Safeguarding. Ultimately, if you still have concerns, you should contact statutory authorities.

What action should you take where you suspect abuse but there has been no disclosure?

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

Raising a concern

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

First, you should raise the concern with the relevant DSL who will then raise it with the head of Safeguarding. They will decide the appropriate action considering the information you have given them.

Following this, if you still think there is a concern, or if you feel the matter is so serious that you are unable to discuss it with the above, you should contact the Head of Safeguarding at the Premier League.

What happens where an allegation is made against employees, workers, consultants, agency staff and volunteers?

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

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

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

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

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

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

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

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

What happens when an allegation is made against a child or young person?

Any allegation concerning the abuse of a child or young person perpetrated by another child or young person should be dealt with through this policy and its procedures. If you have safeguarding concerns or a disclosure that a child or young person has committed abuse, then you should report it immediately to the Designated Safeguarding Lead and Head of Safeguarding.

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

Additional documents support this policy and can be made available on request.

Key Safeguarding Contacts

Head of Safeguarding - Lisa Carter

Senior Designated Safeguarding Officer for Foundation - Laura Nicholls

Designated Safeguarding Leads:

Foundation - Lee Smith

Foundation - Tom Warren (Ball Crew/Match Day)

Vulnerable Adults - Laura Wright

Molineux - Julie Ballenger (Match Day)

Molineux - Becky Elvins (Hospitality)

Academy - Natalie Deakin (Education)

Academy - Jon Hunter Barrett (Head Coach/Academy)

Academy - Wesley Hughes (Coach/Academy)

Academy - Carl Parton (Academy Stewards/Drivers)

Academy - Lisa Hollis (Player Care)

Molineux - Kerri Davies (Mascots)

Molineux - Alan Roberts (Match Day)

External Safeguarding Contacts:

Premier League Head of Safeguarding

Jessica Addicott - jaddicott@premierleague.com

NSPC

0808 800 5000 (24 hour helpline) help@nspcc.org.uk www.nspcc.org.uk

Child Line

0800 1111 2417 www.childline.org.uk

Child Protection in Sport Unit

0116 234 7278 cpsu@nspcc.org.uk www.thecpsu.org.uk

CEOP Centre – Child Exploitation and Online Protection

www.thinkuknow.co.uk www.ceop.police.uk