

Wolverhampton Wanderers FC

SAFEGUARDING

Children and Young People

ONE PACK



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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. 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 to promote children and young people's welfare.

Safeguarding Framework

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 regular safeguarding operations meetings and we also have several 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



Definitions

- Child includes everyone under the age of 18.
 - Safeguarding refers to the actions we take to ensure all children are safe from harm when involved in our clubs and activities.
 - Child Protection is a set of activities that are required for specific children who are at risk/or are suffering from significant harm.
 - Abuse refers to the acts of commission or omission that lead to a child experiencing harm.
 - Harm refers to the negative impact or consequences upon the child of those actions.
 - Violence refers to “all forms of physical or mental violence, injury and abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse.” Article 19 UN Convention on the Rights of the Child
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Roles and Responsibilities

We believe that children and young people have the right to take part in sport in an environment which is safe and free from any risk of abuse.

The Head of Safeguarding - is accountable for safeguarding provision across the Club which will include the development and nurturing of a safeguarding approach which is embedded in effectively across the club. The Head of Safeguarding champions safeguarding at all areas of club activity and works collaboratively with all stakeholders to ensure safeguarding practice is good throughout the organisation.

Lead Designated Safeguarding Staff - are responsible for ensuring that all frontline staff are adequately trained and able to carry out their safeguarding roles and will provide advice and guidance to staff through various means of the club’s communication networks.

Heads of Department and Senior Staff - have specific responsibilities for safeguarding policy, procedures and appropriate systems are given to management and those involved in the recruitment, selection and training of staff. Heads of Department and their managers are responsible for ensuring they comply with safeguarding, safer recruitment, and safe working practices in their day-to-day operation within their departments and projects.

All Staff - have a responsibility to provide a safe environment for children and identify children who may need extra help or who are suffering, or are likely to suffer, significant harm.

All Staff - have a responsibility to take appropriate action and report concerns.

All Staff - should respect and abide the Club’s Code of Conduct.

All Staff - members should work with the Designated Safeguarding Leads and the Head of Safeguarding, to deal with concerns.



PRACTICE

Positive Practice

The Wolves badge is powerful and influential. Remember children and young people look up to you.

- Be a role model, displaying consistently high standards of behaviour and appearance (disciplined/committed/time keeping).
- Use language that is child appropriate and socially acceptable.
- 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 aware of 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.
- 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.
- Physical contact must not be intrusive, and the child or young person's consent must be obtained prior to the contact. It should be provided in an open environment to protect yourself and the child or young person.
- 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.

You have a responsibility to report your concerns.

- 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.



Staff and Child Relationships

Wolves provides advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with children. Staff found to be in breach of these rules, or the Code of Ethics and Conduct may be subject to disciplinary action or child protection investigation.

Staff should ensure they maintain healthy, positive, and professional relationships with all children (under 18s) and adults at risk.

Staff working with children and their managers are in a position of trust in relation to young people aged 16 and 17 years.

Wolves personnel must not engage in sexual relationships with them while that unequal power relationship exists. Even after the young person has reached 18 the Club disapproves of relationships between personnel and young people for whom they have previously been responsible.

Position of Trust

All staff are aware that inappropriate behaviour towards children is unacceptable and likely to be unlawful. At all times, their conduct towards children must be professional. In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual.

This means that any sexual activity between a member of staff in a position of authority and trust and a child under 18 on a Club activity may be a criminal offence, even if that child is over the age of consent.

Helping children to keep themselves safe

Children will be expected to comply with a code of conduct and this expectation will be made clear at the start of the activity by a member of staff. Children will be encouraged to conduct themselves and behave in a responsible manner. We remind children, young people, parents, and carers who they can talk to if they are worried or concerned about any staff behaviour.

We embed safeguarding into regular newsletters across the club, on our website, in all inductions and new projects.

Wolves participates in safety campaigns such as Anti-Bullying Week, Safer Internet Day and so on. We will make use of partner relationships and we will actively promote an ethos of respect for children and young people.



Support for Children, their Families, and Staff

When you work regularly with children, young people and adults at risk safeguarding issues and concerns can be daily. Dealing proactively and confidently is part of the role and expected.

However, a child protection issue can be more complex and as well as devastating for the child can also result in distress and anxiety for staff who become involved.

We will support children, their families, and staff by:

- Taking all suspicions and disclosures seriously.
 - Nominating a link person who will keep all parties informed and be the central point of contact.
 - Responding sympathetically to any request from children or staff for time out to deal with distress or anxiety.
 - Maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies.
 - Storing records securely.
 - Offering details of helplines or other avenues of external support
 - Following the procedures laid down in our child protection, whistleblowing, complaints, and disciplinary procedures.
 - Co-operating with relevant statutory agencies.
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Complaints Procedure

Our complaints procedure will be followed where a child or parent/carer raises a concern about poor practice towards a child that initially does not reach the threshold for a safeguarding concern.

A safeguarding complaint may include:

- Poor practice, examples include unfairly singling out a child or attempting to humiliate them, bullying, or belittling a child or discriminating against them in some way.
- Formal complaints are managed by senior staff.
- Complaint and feedback mechanisms should be promoted on all children's activities.
- Complaints from staff are dealt with under the Club's complaints and disciplinary and grievance procedures.
- Complaints which escalate into a child protection concern will be managed under the Club's child protection procedures.



Reporting Poor Practice

Poor practice represents unsafe working practice and is a cause for concern and staff should feel able to raise concerns about poor or unsafe practice.

In the first instance, staff should discuss with their line manager. If there are reservations about sharing concerns with the line manager, then any of the following can be contacted directly:

- Head of Safeguarding, Head of Department, Director of HR, or the NSPCC Helpline.
 - If a member of staff believes that this route has been ineffective, whistleblowing procedures are in place for such concerns to be raised.
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Concerns about a Colleague

If staff members have concerns about another staff member then this should be discussed with the Head of Safeguarding and Director of HR.

If the Head of Safeguarding is implicated, this would be investigated by either an outside body supervised by HR or the Head of Legal.

These guidelines do not prevent anyone from reporting concerns to external agencies such as the Local Authority or the Police.

Allegations against Staff

Any allegations against staff must be reported immediately to the Head of Safeguarding who will refer to the Local Authority Designated Officer in Wolverhampton. When an allegation is made against a member of staff, set procedures must be followed. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen.

A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we must accept that some professionals do pose a serious risk to children and we must act on every allegation. Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly, and consistently and to be kept informed of its progress. Suspension is an entirely neutral act and may assist the unfettered investigation of concerns. However, it is not the default option and alternatives to suspension will be considered. In some cases, staff may be suspended where this is deemed to be the best way to ensure that both the staff member and children are protected. In the event of suspension, the Club will provide support and a named contact for the member of staff.

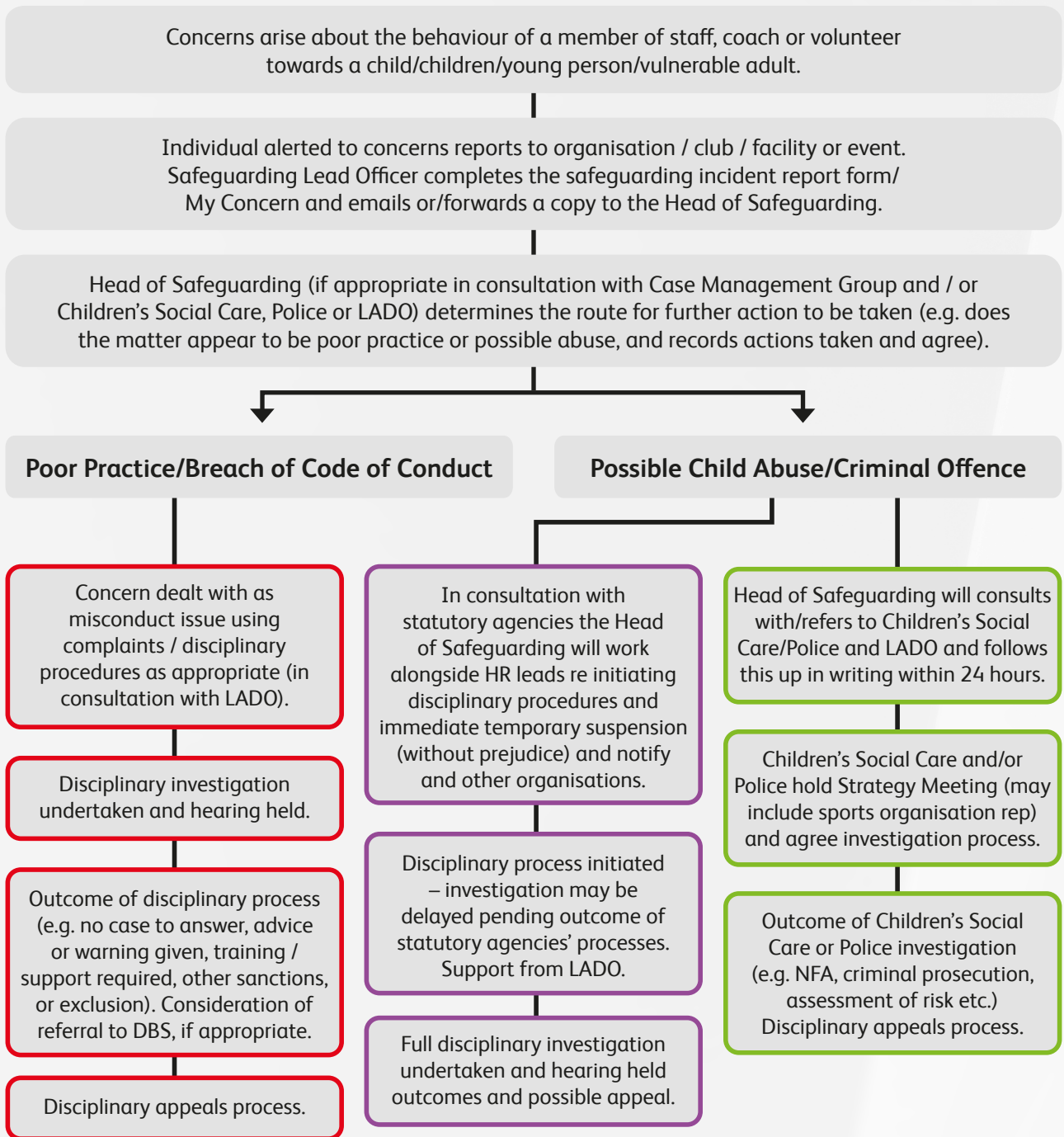
Staff are reminded that publication of material that may lead to the identification of a member of staff who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing, including content placed on social media sites.



PROCEDURE FLOWCHART

Concerns about a member of staff

Concerns arise about the behaviour of a member of staff, coach or volunteer towards a child/ children/young person/vulnerable adult (e.g. allegation about a coach or officer's behaviour towards a child, includes poor practise, not following safer working guidelines and/or abuse).



Historical Allegations

Any staff that become aware of an incident should report it to the Head of Safeguarding.

Allegations concerning staff who no longer work at the Club. All historical allegations will be reported to the Local Authority Designated Officer and the Police even if the alleged perpetrator of the abuse is believed to be deceased.

Staff Training and Induction

It is important that staff receive training and awareness to enable them to recognise the possible signs of abuse, neglect, and exploitation and to know what to do if they have a concern.

New staff will receive a briefing during their induction by their line manager, which includes familiarisation with the Club's safeguarding policy, safe working practices, reporting and recording arrangements, and details for their Designated Safeguarding Officer(s) and the Head of Safeguarding. Staff should be aware of systems within the Club which support safeguarding. All staff members should also receive appropriate safeguarding and child protection information throughout the season.

We also encourage you to be in charge of your own reading and learning. If you have a gap in knowledge, then fill it!

The minimum being:

For staff working with children in Regulated Activity - The FA Safeguarding Children Workshop (or equivalent) every three years, Essential club and/or Premier League Safeguarding Training

For other staff working with children in a position of authority and trust - Essential club and/or Premier League Safeguarding Training plus additional appropriate safeguarding information and/or training.

For all other staff - Safeguarding awareness through safeguarding emails and other communications.

Staff are responsible for maintaining their certificates and ensuring that their safeguarding training, first aid and criminal records checks are updated every three years. All new members of staff will undergo an induction that includes familiarisation with the Club's safeguarding policy, safe working practices on their activities, as well as identification of their child protection training needs.

Visitors with a professional role, such as social worker or members of the Police will have been vetted by their own organisation.

Any professionals visiting the Club should provide evidence of their professional role and employment details (an identity badge for example). If felt necessary, the Club can also contact the relevant organisation to verify the visitor's identity.



STAFF RECRUITMENT

Safer Recruitment and Staff Inductions

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
- 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.

A list of key information including DBSs will be maintained. Volunteers will undergo checks commensurate with their work at the Club and contact with children. Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised or be allowed to engage in regulated activity. Volunteers who are supervised: Volunteers who work only in a supervised capacity and are not in regulated activity will undergo the safe recruitment checks appropriate to their role, including a DBS check at Enhanced level but without a barred list check.



Third Party Organisations

The Club obtains written confirmation from supply agencies or third-party organisations that agency staff or other individuals who may work at the Club with children have been appropriately screened. Arrangements should be that such staff work in an open environment with Club staff overseeing.

Contractors

Contractors will be given a site induction from their Club contact, including an expected code of behaviour/expectations for conduct.

- In order to avoid compromising situations, the contractor will be required to avoid contact with children.
- In the event of a contractor carrying out work in an area that is usually occupied by children, this work will be undertaken when children are not present, or where this is not possible, the contractor will work in an open environment and will be overseen by Club personnel.
- Where supervision is not possible, for example in parts of the premises where Club personnel plans will be made to avoid contact with children.

More information can be found www.wolves.co.uk/club/policies/safeguarding

Visitors to the Club

Including contractors, are asked to sign in and are given a badge, which confirms they have permission to be on site. This badge should always be worn. Parents/carers who are delivering or collecting their children do not need to sign in. All visitors are expected to observe the Club's safeguarding and health and safety regulations to ensure children are kept safe. The Club policy is that visitors should be supervised by Club staff while on site.



PHOTOGRAPHY

Photography and Images

Most people who take or view photographs or videos of children do so for entirely innocent and legitimate reasons. Sadly, some people abuse children through taking or distributing images. We must therefore ensure that we have some safeguards in place.

To protect children, we will:

- Seek parental consent for photographs to be taken or published (for example, on our website, on our publications or in newspapers). If a child does not wish to have their image taken, we will respect this.
 - Use the child's first name with an image if consent has been given to do so.
 - Ensure children should be appropriately dressed in outer clothing garments covering their torso from at least the bottom of their neck to their thighs (i.e., a minimum of vest/shirt and shorts) and feature safety equipment, such as shin pads or guards.
 - Encourage children to tell us if they are worried about any photographs that are taken of them.
 - Forbid photography in private areas, such as changing rooms, toilets, showers, or bedroom or whilst a child is in a state of undress.
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Matchday Photography

Children and young people attend games as spectators. Images of children may appear as part of the crowd on matchdays and be reproduced in official Wolves promotional material and appear in the public domain. The Club's terms and conditions of ticket purchase and standard ground regulations state that images may be taken of fans within the crowd and used in promotional material. Ticket holders agree to these conditions when purchasing a ticket. Any queries on promotional material featuring a child/child should be addressed to The Head of Safeguarding and/or Head of Media.

Lost or Missing Children

During club activities every effort is made to ensure children and young people remain with their parents, carers, or the activity leaders. Should a child or young person become lost or go missing during a club activity every effort will be made to locate the child or young person as quickly as possible. Should the child or young person not be located within a reasonable timeframe, contact will be made immediately with their parents or carers and the police to file a missing child/young person's report. In the event of any such report being made the issue must also be reported to the Safeguarding team at the earliest possible opportunity and recording on MyConcern.

Additional information www.wolves.co.uk/club/policies/safeguarding



ONLINE

E-Safety and Social Media

Children and young people increasingly use electronic equipment daily to access the internet and share content and images via social networking sites such as Facebook, Twitter, Snapchat, and Instagram.

Unfortunately, some adults and young people will use these technologies to harm children. The harm might range from sending hurtful or abusive texts and emails, to grooming and enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings. Children may also be distressed or harmed by accessing inappropriate websites that promote unhealthy lifestyles, extremist behaviour, and criminal activity. Cyberbullying and sexting by children on Club activities will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures. Serious incidents, such as sexting and peer-on-peer abuse will be managed in line with our child protection procedures and/or Managing Allegations Against Other Children policy in line with UKCCIS Guidance: Sexting in schools and colleges, responding to incidents, and safeguarding young people (2017).

Many children own or have access to handheld devices and the Club encourages parents and carers to keep their children safe when using the internet and social media at home and in the community.

We take part in national awareness events and regularly share information via newsletters. As a rule, children are not allowed to take images on Club activities, in particular images are prohibited in private areas such as: toilets, changing rooms, showers, and bedrooms and when other children are in a state of undress.

E-Safety and Staff

Any communication using ICT (Information Communication Technology) by staff should be carried out using Club IT, e.g. mobile phone, and Club email address, this ensures that Club policies, firewall/filters and security apply.

It is important for staff to maintain professional and personal boundaries in and out of work:

- Staff should not have direct personal communication with children/young people from Club activities using ICT, e.g. email, mobiles (unless an approved arrangement is in place)
- On Facebook, or any other social media, any requests from children or their parents/carers should be rejected. Concerns arising from contact on Facebook or other social media from children should be directed to the designated safeguarding officer or the Head of Safeguarding. This will help to avoid blurring boundaries between personal and professional life.
- As a general policy, communication with children age under 16 is via the Club through the parent/carer or school/organisation. However, the Club recognises that direct communication with young people may be required on certain activities for professional and welfare purposes and in such circumstances the Designated Safeguarding Officer /Head of Safeguarding should be updated



- From 3 April 2017 anti-grooming legislation (Section 67 of the Serious Crime Act 2015) came into force and it became illegal for adults to send sexual communication to children under 16 years of age for the purposes of sexual gratification. The law covers both online and offline communication, including social media, email, and letters. Wolves has an appropriate filtering system that manages the following content (and web search): discrimination; drugs/substance; extremism; malware hacking; pornography; piracy and copyright; self-harm; violence. This includes the Academy setting and the Wi-Fi settings for Academy visitors (including parents/carers and children)

Children and Young People on Work Experience

The Director of HR and the Head of Safeguarding should be informed of work experience placements at the Club for children of compulsory school age and young people. The Club's Safeguarding Policy, including its Code of Ethics and Conduct, apply to staff overseeing these placements. Any work experience placements must be agreed by the Director of HR and approved by the Head of Department. The placement must be planned and structured in advanced. Work experience placements should not have unsupervised access to children.

Staff that are of Compulsory School Age

Children of compulsory school age employed as staff are subject to more stringent employment conditions and hours than young people (16-18) and require close supervision. Children of compulsory school age require an employment licence from the Education Welfare Service in the Local Authority they intend to work, along with consent from the parent/carer and the school. Seek advice from the Head of Safeguarding and Welfare. Young People as Sports Coaches Many sports have a system to allow under 18's to receive coaching or refereeing awards, but this should be about developing a young person's sense of belonging and responsibility rather than depending on them to take full responsibility for managing a group of children. Coaches under the age of 18 can only supplement the adult coaches supervising the activity.

Match Day Ball Crew

The Department for Education do not regard Match Day Ball Crews under school leaving age as either performing or employed, but rather as volunteering (unpaid) and therefore are not subject to employment or performance licences. However, good practice for children's activities should apply with emphasis on supervision and hand overs - parental consent must be in place. Wolves have dedicated Ball Crew staff, and this is overseen by designated lead who can act promptly to protect a child if necessary. All our Ball Crew receive training and support and we regularly ask for feedback. We are proud that all our Ball Crew young people are local to Wolverhampton and thoroughly enjoy the experience.



ACADEMY

Transport and Travel

We have a standalone transport policy that we review each season.

The Academy has a Transport Manager who oversees safe transport arrangements across the Academy, including registered Academy players and players attending the Club on trial.

Accommodation

Hotels

If an Academy player is required to stay overnight in hotel accommodation for an Academy activity, the child/children will be accompanied by at least two staff members who have been DBS checked and have undertaken safeguarding training. Parental consent will be sought in advance.

Trialists: No child under the age of 18 should stay in a hotel on their own without adult supervision (e.g., a parent or designated guardian).

Host Families

Academy Host Families welcome elite young players into their homes. Hosts are not employees of Wolves but will be subject to host family recruitment and selection protocols, such as an application form, self-declaration form, home visits, references, and a Host Family Code of Conduct.

Hosts will be visited in their homes as part of the recruitment and selection process and an assessment made of the home and accommodation offered. The family will be subject to an Enhanced DBS check with Children's Barred List check for overnight accommodation. Any other household members aged 16 and over will be subject to a DBS check at basic level. The homestay (house) will be subject to initial and ongoing health and safety risk assessment with an annual check before the start of the new season in July. Landlord certificates (or equivalent) for electric and gas obtained. As part of the Academy's ongoing vigilance, Hosts will be regularly monitored and visited by The Player Care Team with support from the Head of Safeguarding.

Hosts will be given appropriate training and support for their role – this will be organised by the Player care team. The training will include safeguarding, first aid, diet, and lifestyle. The Club will seek guidance from specialist organisations.

Private Fostering

Any potential placement of a child aged under 16 in a host family for 28 days or more may be deemed Private Fostering and the Head of Safeguarding needs to be informed in order to make an assessment and inform the Local Authority, as it is a mandatory duty to inform the local authority of children in such arrangements.



Youth Loans, Trials & Work Experience Parental Consent

If an Academy Player or young Professional under the age of 18 joins another club on trial, work experience or a Football League Youth Loan consideration will also be given to the player's education programme, travel, and accommodation arrangements.

A loan player is supported by our Loans Manager and the Player Care Team. A trialist or work experience player will be supported by the Player Care team. Updates are regularly shared, and players welfare is discussed regularly whilst on loan, trial, or work experience.

Visiting Trialists

For players under the age of 18 who are joining Wolves Academy on trial (including Work Experience), parental consent will be sought prior to the trial taking place, along with a full medical history and injury disclaimer.

Where accommodation is required during the trial period, the player should be accompanied by an appropriate adult (ideally a parent/carer) – this is the first and preferred option for a trialist's initial visit – and a local hotel may be used. It is the responsibility of the child's parent/carer to ensure safe travel and accommodation arrangements and if the child is accompanied by an adult who is not a parent/carer then it is good practice for separate rooms to be booked.

After the first few initial visits, host family accommodation may be considered if the child is not accompanied by an appropriate adult.

U18, 21 & First Team Progression

As players progress through the Academy system they may have the opportunity to train and play with the adult provision of the Club. The Club will support the player(s) during this transition and the preparation starts in Youth Development Phase through to the Professional Development Phase with extra activities to develop life skills and independence in the education programme, along with support from Academy staff.

Staff working with Development and First Team provision are DBS checked and receive safeguarding training or awareness. We offer support to any Under 18 'playing up' and have a standalone protocol which identifies vulnerability, risks to promotes vigilance from staff to safeguard the welfare and wellbeing of the player.



Academy Tours and Tournaments

The opportunity to take part in tours and tournaments is something our players really look forward to and we want them to have the best experience they can. We make sure that we update parents and players before going and can answer any worries or concerns.

We ensure:

- Parental consent and arrange how we will be keeping in touch during the tour.
- A designated safeguarding/player care lead is identified for the tour and is responsible for holding emergency contact and personal details for players and staff.
- Academy staff are responsible for players at all times.
- Vehicles used for carrying players and staff will be roadworthy, checks to be made on vehicles on a weekly basis and vehicles insured for the purpose.
- Alternatively, a travel company will be used, and assurances sought that vehicles are roadworthy, and staff are appropriately qualified.
- Any hired vehicles and drivers will be hired from reputable companies.
- All drivers of any vehicles used to transport players and coaches will have passed relevant driving tests, assessments and hold proper insurance to do so.
- Adequate adult/player ratios will be followed for any residential tours.
- If residential tours are undertaken, accommodation booked will be of suitable standard for players' safety and comfort and a pre-visit will be made by a member of Wolves staff.
- Suitable food and drink are provided throughout the tour (unless notified in advance).
- A risk assessment will be completed and signed off – including designated safeguarding lead and/or Head of Safeguarding
- Staff do not share rooms with players.
- Staff will update My Concern with any worries/concerns.
- Staff and player debrief at the end of each tour/tournament and we take the positives and 'lessons learnt' into the next opportunity.

We continue to review our Tours and Tournaments approach throughout the season.



CHILD ABUSE

The impact of child abuse, neglect and exploitation should not be underestimated. It is important we take responsibility to recognise signs and symptoms of abuse and know how to support children and young people.

Recognising Abuse

To ensure that children are protected from harm, staff need to understand what types of behaviour constitute abuse and neglect.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone, or leaving knives or matches within reach of an unattended toddler.

Abuse may be committed by adult men or women and by other children and young people.

Child welfare concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. Children may be abused in a family, in an institutional or community setting, by those known to them or by a stranger, including, via the internet. Abuse and neglect can happen over a period but can also be a one-off event. Child abuse commonly occurs within relationships of trust or responsibility (including parents/carers) and is always an abuse of power/position/authority or a breach of trust.

Facts:

- Children living away from home are vulnerable to abuse.
- Children are also abused by other young people and, on occasion, by young children.
- Abuse can happen to a child regardless of their age, gender, race, ability, or class.

Adults have an important and vital role to play in looking out for the possible signs, including a sudden and noticeable change of behaviour.

The warning signs and symptoms of child abuse and neglect can vary from child to child. Disabled children may be especially vulnerable to abuse because they may have an impaired capacity to resist or avoid abuse. They may have speech, language and communication needs which may make it difficult to tell others what is happening. Children also develop and mature at different rates so what appears to be worrying for a younger child might be normal behaviour for an older child. Parental behaviours may also indicate child abuse or neglect. This could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health. It is important to recognise that a warning sign doesn't automatically mean a child is being abused.



Warning Indicators

A noticeable change in the child's or young person's behaviour or appearance is an indicator. Recognising abuse may be a cluster of symptoms or repeating patterns.

Here are a few example signs that would raise concern:

- Notable changes in behaviour or character, such as aggression or withdrawal;
- Severe/unexplained bruising or burn marks or scalds.
- Inadequate or inappropriate clothing for child's size, weather or time of year;
- Sleeping disorders or bed wetting in children aged 9+ through to teens;
- Reluctance to remove clothing for activities: arms and legs covered to hide bruises/marks;
- Persistently dirty with body odour / smearing;
- Inappropriate sexualised behaviour or words for the age of child (e.g., "You're so fit Sir/Miss);
- Drawings/doodling of sexually explicit conduct– in particular where it is traced over heavily;
- Self harming (in particular around hidden areas such as back of legs, arms) and eating disorders.
- Children who talk about running away;
- Children who drink alcohol regularly from an early age;
- Children who are concerned for younger siblings without explaining why;
- Parents who are dismissive and non-responsive to practitioners' concerns;
- Parents who collect their children from school when drunk, or under the influence of drugs;

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. Concerns should be viewed as part of a jigsaw, and each small piece of information will help the designated safeguarding lead and Head of Safeguarding an to decide how to proceed.

It is very important that staff report their concerns/worries/observations using MyConcern – they do not need 'absolute proof' that the child is at risk.



Types of Abuse

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.

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

Emotional abuse: The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. - It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. - It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. - It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. - It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether the child is aware of what is happening. - The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. - They may also include non-contact activities, such as involving children in looking at (or in the production of) sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect: The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: - provide adequate food, clothing and shelter (including exclusion from home or abandonment); - protect a child from physical and emotional harm or danger; - ensure adequate supervision (including the use of inadequate care-givers); or - ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Bullying: Bullying is "the repetitive, intentional hurting of one person or group by another person or group, where the relationship involves an imbalance of power." The Anti-Bullying Alliance. This definition includes cyber-bullying. Bullying can be physical, verbal, or psychological. It can happen face to face or through cyberspace (cyberbullying). - Children are vulnerable to abuse by their peers. Bullying can and does occur anywhere there is inadequate supervision. The Club has an Anti-Bullying policy. All activities with children are covered by the Club's Antibullying policy. - Incidents of cyber-bullying should be brought to the attention of staff or a senior manager and the messages retained as evidence. Although most 'low level' incidents will be dealt with at the time by coaches/staff, all will be recorded and reported to the next level of management to determine whether further action should be taken and recorded using MyConcern.



Identifying Vulnerable Children

Under 5s (especially babies under 18 months), Children in care and children with Special Education Needs or Disability (SEND) can face additional safeguarding challenges and are more vulnerable to abuse (including bullying) and exploitation. Risk of abuse or exploitation is increased if a child experiences poverty, mental health issues, substance abuse, homelessness, political instability, and social exclusion.

Other high risk factors that may make a child more vulnerable is when there is compromised parenting: when a parent's capacity to safeguard and appropriately care for their child(ren) is limited: Substance misuse, domestic violence and parental mental ill health pose significant risks factors for children and it is the combination of these factors which is particularly toxic.

Other factors that raise a concern with children are: - related issues: sexually harmful behaviour, spirit possession/witchcraft. - special circumstances: gangs, honour-based violence, young carers, truants (frequent school absences), missing from care or home, violent extremism.

Children who may be particularly vulnerable

For all children receive equal protection, special consideration must be given to children who are:

- Disabled or special educational needs (SEN)
- Young carers
- Affected by parental substance misuse, domestic violence or parental mental health
- Asylum seekers
- Living away from home (short and long term)
- Vulnerable to being bullied, or engaging in bullying
- Transient lifestyles
- Living in chaotic and unsupportive home situations
- Vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
- At risk of sexual exploitation
- Do not have English as a first language
- At risk of female genital mutilation (FGM)
- At risk of forced marriage
- At risk of being drawn into extremism

Children in Care

The Project Manager should have details of the child's social worker and the name and contact details of the social worker, along with escalation contacts when people are not contactable (e.g., out of hours, on leave/half term or holiday periods, in meetings). It may be necessary for staff to have information about a child's legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child.

Prevent Duty

it is essential that staff can identify children who may be vulnerable to radicalisation and know what to do when they are identified. Prevent Duty is embedded within our safeguarding process. We have a responsibility to ensure that we are helping protect our young people from radicalising influences and able to Identify any vulnerabilities or worrying changes in behaviour.

Essential training can be found here - <https://www.elearning.prevent.homeoffice.gov.uk/edu/screen1.html>



MANAGING A DISCLOSURE

Reporting

It is important to remember that abuse happens and a culture of taking it seriously and maintaining an attitude of “it could happen here” will help develop an approach of vigilance.

There will be occasions when staff may suspect that a child may be at risk of harm. The child's behaviour may have changed and be out of character, they may write stories or draw images that reveal confusion or distress, or physical but inconclusive signs may have been noticed.

In these circumstances, staff should give the child the opportunity to talk. The signs they have noticed may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill, or an accident has occurred. Following an initial conversation with the child, if the member of staff remains concerned, they should discuss their concerns with their manager, designated safeguarding officer or Head of Safeguarding.

It is fine for you to ask a child or young person if they are OK or if you can help in any way. Remember any child could become a victim of abuse.

Staff should record these early concerns using MyConcern.

If a child/young person does begin to reveal that they are being harmed, staff should follow the advice below.

Key points for staff to remember for taking action are:

- Discuss your concern with your line manager and report it your Designated Safeguarding Officer or the Head of Safeguarding– follow the procedure for your activity.
- In an emergency take the action necessary to help the child, if necessary call 999 or 101 for local police.
- Do not start your own investigation
- Share information on a need-to-know basis only – do not discuss with colleagues, friends or family
- Make a record and upload to MyConcern
- Seek support for yourself if you are distressed.

If the child needs immediate medical attention:

- Call for an ambulance.
- Inform parents you are doing this.

If parents are allegedly involved in the abuse, only inform them that you are taking the child to hospital. Do not share any other information.

Inform doctor of your concerns in relation to child protection issues.
The doctor will take appropriate action.

Inform your manager and report your concerns.



Child Disclosures

If a child discloses about any risks to their safety or wellbeing, the staff member will need to tell the child know that they must pass on the information – **staff are not allowed to keep secrets.**

How to respond

You may feel upset or angry but it's important that you remain calm. That child or young person has chosen you because they feel safe with you.

- Listen and/or closely observe their presentation and behaviour
- Do not interview, investigate, or ask leading questions.
- Let them know that you will need to tell someone else to help them.
- Do not promise to keep what they tell you secret.
- Do not speak with the alleged person or parents/carers of the child.
- Respond appropriately: make notes and discuss with your line manager.
- Report your concerns: Contact your Designated Safeguarding Officer or the Head of Safeguarding.
- Record your observations using MyConcern
- Keep your own personal notes in case of criminal investigation.

IMPORTANT: If a child starts disclosing something, but does not continue when he/she is told that it cannot remain confidential, this needs to be raised as a concern.

Reporting procedure for activities in schools (or other organisations)

When delivering activities in a school or other organisation or directly under the supervision/ management of school/organisation staff, the school's/organisation's arrangements for child protection will apply: - You must inform the designated teacher or person for that school/organisation, who will follow the Local Safeguarding Children Board (LSCB) procedures. - You should then inform your Safeguarding Officer or the Head of Safeguarding and Welfare. When delivering activities in partnership with a school, but on Club premises or out of school hours and without supervision from the school/organisation, follow the Club's procedures.

Notifying parents

The Club will normally seek to discuss any concerns about a child with their parents. This must be handled sensitively, and the Head of Safeguarding will contact the parent in the event of a concern, suspicion, or disclosure.

However, if the Club believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care.

Referral to children's social care

The Head of Safeguarding/Designated safeguarding Lead will make a referral to children's social care if it is believed that a child is suffering or is at risk of suffering significant harm. The child (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child. **Any member of staff may make a direct referral to children's social care if they genuinely believe independent action is necessary to protect a child.**



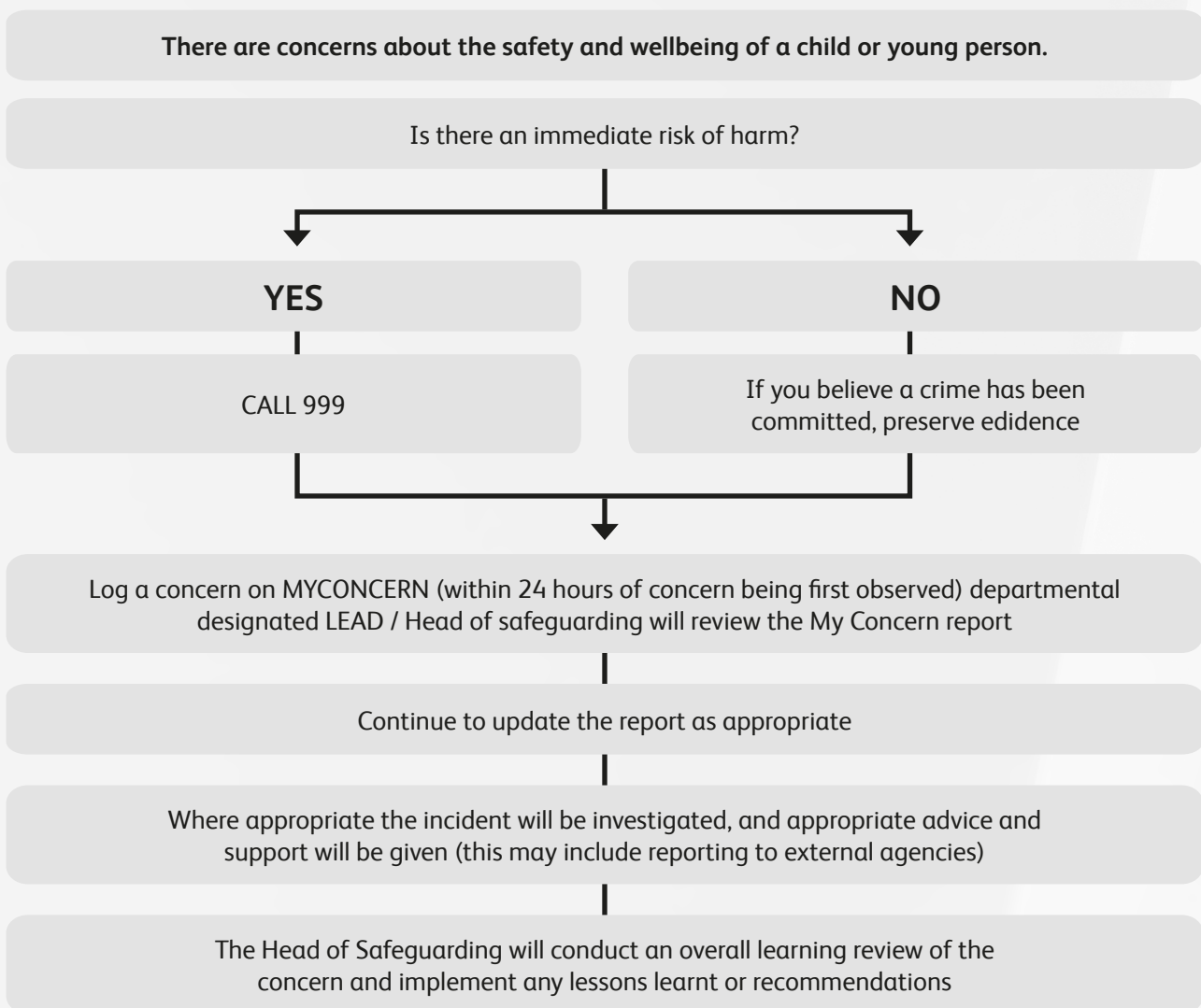
REPORTING FLOWCHART

Raising a Safeguarding Concern

No one should ever assume that someone else will help a child OR young person. It is not the responsibility of anyone at the Club to decide whether abuse has taken place.

However, everyone does have a responsibility to act on any concerns that are reported or witnessed. **We ask everyone to remember that safeguarding is everyone's responsibility.**

All Staff will be fully supported and protected if they make any report in good faith about a concern. If you have a concern you should follow the following procedure.



Taking no action is never an option if you have legitimate concerns.



Preserving Evidence

In situations of possible physical or sexual assault:

- In physical abuse cases, where a child, young person or Adult at Risk wishes to show you an injury, only observe what they consent to show you and only ever observe what is appropriate
- Do not touch what you do not have to. Wherever possible leave things as they are.
Do not clean up, do not wash anything or in any way remove fibres, blood etc.
If you do have to handle anything at the scene keep this to a minimum
- Do not touch any weapons unless they are handed directly to you.
If this happens, keep handling to a minimum
- Place the items into a clean dry place to hand to the police
- Preserve anything that was used to comfort the victim, for example a blanket etc as this could have fibres or other evidence transferred to it
- Secure the room. Do not allow anyone to enter unless strictly necessary to support you or the victim until the Police arrive

Prior to the arrival of the Police and medical examination:

- Ensure that no one has physical contact with the abused or any alleged perpetrator as cross contamination could destroy evidence
- Encourage the victim not to shower
- Encourage the victim not to change their clothing
- Even when the victim says they do not want police involvement, preserve items anyway as they may change their mind later or you may be legally obliged to inform the Police
- Encourage the victim not to eat or drink if there is a possibility that evidence may be obtained from the mouth



Confidentiality, Information Sharing and Storage

Confidentiality:

All matters relating to child protection are kept strictly confidential and information is disclosed on a need to know basis only.

Information Sharing:

Under the applicable UK and EU laws and regulations that relate to data protection and privacy (the “Data Protection Legislation”), the Club is permitted to share information about a child: “If a professional has concerns about a child’s welfare and believes they are suffering or likely to suffer significant harm they should share the information with children’s social care”. This is reflected in the Guidance “Working Together to Safeguard Children 2018”. Information sharing is guided by the following principles: the information is necessary and proportionate; relevant; adequate; accurate; timely and secure. Information sharing decisions will be recorded, whether the decision is taken to share.

Storage of Information:

Child protection information will be stored and handled in line with all applicable Data Protection Legislation. Information will be stored separately from other records and in a secure place with limited access to designated people, in line with the NSPCC Guidance on Child Protection Records Retention and Storage and all applicable Data Protection Legislation (e.g. that information is accurate, regularly updated, relevant and secure). Written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals, on a need to know basis only.

The Head of Safeguarding will normally obtain consent from the child and/or parents/carers to share sensitive information (or, as it is known under the Data Protection Legislation, “special category personal data”) within the Club or with outside agencies. Where there is good reason to do so, the Head of Safeguarding may share such information without consent and will record the reason for not obtaining consent.

Child protection records are normally exempt from the disclosure provisions of the Data Protection Legislation, which means that children and parents/carers do not have an automatic right to see them. If any member of staff receives a request from a child or parent to see child protection records, they will refer the request to Head of Safeguarding.

Neither Data Protection Legislation nor the Club’s Data Protection Policy prevents staff from sharing information with relevant agencies, where that information may help to protect a child. Files on children concerns are secured electronically. The case management process records how and when concerns are received and responded to, together with details on how the concerns have been dealt with.



Head of Safeguarding Responsibilities when there is an Allegation of Abuse

1. The Head of Safeguarding will ask for a written factual statement from the person making the report – this must be signed and dated. If any statement has been made by the child, this should be reported in the child's own words. These reports should be confined to facts and should not include any opinion, interpretation, or judgement.
2. If the report involves an allegation about a member of staff, this will be referred out to Wolverhampton LADO (Local Authority Designated Officer) Otherwise, if abuse is suspected, the Head of Safeguarding will make contact with children's social care where the incident occurred or where the child lives. Children's social care may involve the police. The Head of Department (or, if the Foundation, the Chief Executive Officer) will be informed of the referral and the Director of HR will also be notified. The parents/carers of the child will be contacted as soon as possible following advice from children's social care or the police.
3. The Safeguarding Officer or line manager will ensure that any child concerned is immediately removed from any possible risk of harm.
4. Once children's social care has been informed and the incident accepted as a referral or notification, the Head of Safeguarding will notify the Club's Head of Legal. If the allegation relates to a member of staff, the Head of Safeguarding will also make the Club's Head of Media aware in order to liaise with the FA (or relevant Sport Governing Body) media department and agree a holding statement.
5. On confirmation that a referral has been accepted: The Head of Safeguarding will notify the FA Safeguarding Team (and other relevant Sport Governing Body), using the FA's Affiliated Football Referral Form (E: safeguarding@thefa.com). The FA will deal with any media enquiries. - The Head of Safeguarding will also notify the Safeguarding Lead at the Premier League (E: safeguarding@premierleague.com). Wolves Foundation: If the referral relates to a member of staff, worker, consultant, third party or volunteer then the Premier League Charity Fund (E: safeguarding@plcf.co.uk) and the Charity Commission (E: RSI@charitycommission.gsi.gov.uk) must be informed. Note: If the abuse relates to a participant disclosing abuse outside the Foundation, this does not need to be shared with the PLCF or Charity Commission. The Charity Commission are only expecting reports regarding abuse or harm to beneficiaries within the charity's care.
6. All information will be dealt with confidentially and shared only with the people on a need-to know or who-must-know basis.
7. If the Head of Safeguarding is implicated, the Head of Legal should be contacted who will inform children's social care in line with the procedure in this section.

Other types of abuse

Please ensure you are familiar with other types of abuse that can occur. You can request additional information, support, and training from The Head of Safeguarding.

<https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/>

REMEMBER - reading and understanding this policy, referring to it, following safe working practice and being familiar with wider safeguarding issues, for example bullying, physical contact, sexual exploitation, radicalisation and extremism, e-safety and information-sharing is everyone's responsibility.



CONTACT DETAILS

Head of Safeguarding

Lisa Carter

Mobile: 07833051063 | Email: lisacarter@wolves.co.uk

Lead Designated Safeguarding Officers

Laura Nicholls

Head of Academy Operations
Mobile: 07807 738659

Steve Cullis

Player Development Manager
Woman and Girls Teams
Mobile: 07572 167346

Lisa Hollis

Player Care Manager
Mobile: 07971 900220

Laura Wright

Disability Access Officer – Matchday (Adults at Risk)
Mobile: 07944 442052

Lee Smith

Foundation Senior Manager
Operations & Safeguarding Lead
Mobile: 07572 167349

Julie Ballinger

Operations Manager – Matchday
Mobile: 07971 475 219

We have several additional officers with safeguarding responsibilities.

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

