



WOLVERHAMPTON WANDERERS FC

CHILD SAFEGUARDING POLICY

MAIN DOCUMENT

Version 0.2

October 2018

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DOCUMENT REVIEW

Last reviewed	Reviewer	Brief detail of amendments
May 2017	P Richards	Whole policy re-written and multiple amendments made
January 2018	P Richards	Policy reviewed and additions made in respect of Social Media
June 2018	P Richards	Policy reviewed in respect of GDPR
October 2018	P Richards	Policy Reviewed in respect of Wolves Foundation

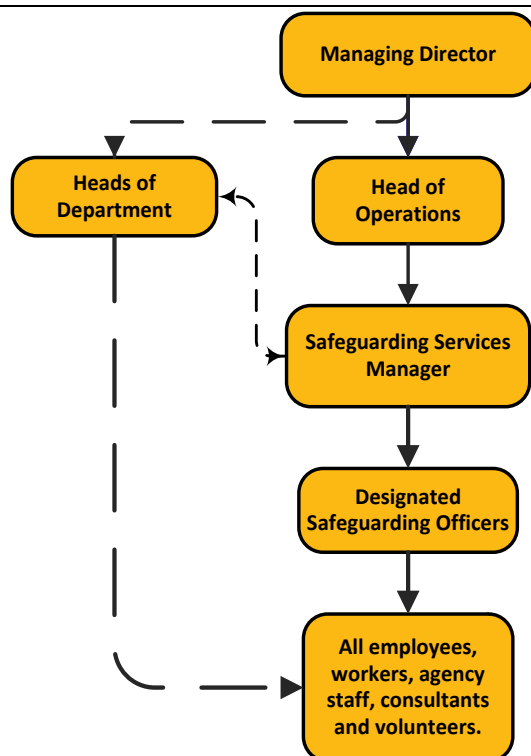
1. SAFEGUARDING CHILDREN POLICY

1.1. GENERAL POLICY STATEMENT BY SENIOR MANAGEMENT

- 1.1.1. In any activity associated with Wolverhampton Wanderers Football Club the safeguarding of children must always be given the highest priority. The well-being and welfare of all children participating in activities is paramount.
- 1.1.2. Wolverhampton Wanderers Football Club will ensure the safety and protection of children through adherence to the child protection procedure and systems which promote practices and services that protect children from physical, sexual or emotional harm and from neglect or bullying, and create a safe environment including an effective recruitment procedure which assesses suitability to work with children.
- 1.1.3. Currently the club Safeguarding Services Manager is Paul Richards
- 1.1.4. The Club will abide by a Code of Conduct which states we will:
- Respect and promote the rights, wishes and feelings of children.
 - Recruit, train and supervise staff to adopt best practice in order to safeguard and protect young people from abuse and themselves from false allegations.
 - Respond to complaints, concerns and allegations and implement the appropriate disciplinary and appeals procedures.
- 1.1.5. It is mandatory for all staff working for Wolverhampton Wanderers Football Club in a paid or unpaid capacity with children to adopt the Safeguarding Policy procedures and systems. All staff share the responsibility for the protection of children and will show respect and understanding for the rights, safety and welfare of children, and conduct themselves in a way that reflects the principles promoted by Wolverhampton Wanderers Football Club.
- 1.1.6. Safeguarding information is openly available. The Club's policy and complaints/feedback mechanisms are readily accessible to parents and stakeholders who have an interest in safeguarding children at the Club.
- 1.1.7. Wolverhampton Wanderers Football Club's policy and procedures are embedded in all activities at the Club and apply to all children regardless of gender, age, race, culture, language, ethnic or national origin, sexual orientation social class, religion, disability or family circumstances.
- 1.1.8. A child or young person is defined as anyone under 18 years. A separate policy is available for Vulnerable Adults regardless of their age.
- 1.1.9. The Club will forward concerns to the appropriate agencies and work under local and national safeguarding guidelines.

1.2. ROLES AND RESPONSIBILITIES

- 1.2.1. The club has a comprehensive safeguarding structure which ensures the safety and welfare of all children and young people who engage with the club.
- 1.2.2. **The Managing Director:** is responsible for all aspects of the club and to ensure safeguarding is a key priority at Board Level.
- 1.2.3. **The Head of Operations:** is responsible for providing strategic leadership that assists the Safeguarding Services Manager to deliver the safeguarding strategy, vision, values, priorities, policies, promoting the welfare of vulnerable groups.
- 1.2.4. **Safeguarding Services Manager:** is responsible for the strategic and operational direction and embedding safeguarding across the club, communicating at Heads of Department level. The Safeguarding Services Manager is also lead point of contact should safeguarding concerns arise and the Lead Disclosure Officer.
- 1.2.5. **Designated Safeguarding Officers (DSO):** The DSO's support the Safeguarding Services manager to pro-actively promote and raise safeguarding awareness and assist with responding appropriately to safeguarding concerns and allegations.
- 1.2.6. **Heads of Department:** are responsible for embedding safeguarding within their own departments as well as being the point of contact should a concern arise within their own departments.
- 1.2.7. **All employees, workers, agency staff, consultants and volunteers:** are responsible for familiarising themselves with the club's policy and procedures, ensuring the safety and welfare of all children and young people as well as promoting best practice and creating a safe and inclusive environment to prevent harm occurring through awareness of what constitutes abuse and neglect.



2. SAFEGUARDING CHILDREN PROCEDURES

- 2.1. The indicators of child abuse do not necessarily mean that a child has been abused. It is important that any allegations or concerns about a child be reported promptly.
- 2.2. You are not responsible for deciding whether or not abuse has occurred. The primary responsibility of the club is to ensure that concerns and any relevant information about possible abuse is passed on to the police or children and families social care without delay. As a representative of wolverhampton wanderers football club it is your responsibility to act.
- 2.3. These procedures will help to ensure a prompt response to concerns about a child's welfare or safety.

2.1. CONCERNS AND SUSPICIONS

- 2.1.1. A gradual but marked change in a child's attitude, actions and behaviour can be cause for concern. It is important that these concerns are flagged. This does not necessarily mean that abuse is occurring but may be symptoms of other issues where a child needs support, ie recent death of a relative, anxious about sports performance. The welfare of the child is paramount.
- 2.1.2. If you have any concerns about the welfare of a child or about a parent:
- Record the facts of the incident on a Safeguarding referral form
 - Without delay report the concern to an appropriate line manager or the Safeguarding Services Manager to the Children's Services Officer (see "Useful Numbers")
- 2.1.3. **The same procedure should be followed if you have concerns about bullying or the behaviour of a parent or another adult (not employed by Wolverhampton Wanderers Football Club).**

2.2. CONCERNS AND SUSPICIONS ABOUT A MEMBER OF STAFF

2.2.1. You may have concerns about a colleagues practice – all concerns should be acted on:

- If the concern is minor, speak with person, otherwise discuss it with Senior Management.
- If the concern persists or it is not minor, then raise the concern immediately with the designated Safeguarding Services Manager.
- The FA/NSPCC Helpline can also be contacted in confidence.

2.2.2. When reporting concerns about a colleague you should understand that it is common for there to be a high degree of uncertainty, including feelings of guilt for being the person reporting the matter. It takes courage to challenge inappropriate behaviour by colleagues.

3. CHILD ABUSE

3.1. WHAT IS CHILD ABUSE?

- 3.1.1. Child abuse most commonly occurs within relationships of trust or responsibility and is an abuse of power or a breach of trust. Children are also abused by other young people/children. Abuse can happen to a child regardless of their age, gender, race, ability or class.
- 3.1.2. There are four main types of child abuse: **sexual abuse, physical abuse, emotional abuse** and **neglect**. Also included in this document is a section on **bullying**.
- 3.1.3. An individual may abuse or neglect a child directly, or may be responsible for abuse because they fail to prevent another person harming that child.

3.2. RECOGNISING CHILD ABUSE

- 3.2.1. Recognising child abuse is not easy, and it is **not your responsibility to decide** whether or not child abuse has taken place or if a child is at significant risk. However, you do have a **responsibility to act if you have a concern**.
- 3.2.2. You can establish a child abuse concern in a number of ways:
- the child may tell you
 - from another person (adult or child)
 - through the child's behaviour
 - through the visual signs, i.e. injury
- 3.2.3. This information is not designed to turn you into an expert but it will help you be more alert to the signs of possible abuse.

3.3. SEXUAL ABUSE

- 3.3.1. Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. It may involve non-contact activities, such as involving children in looking at, or in the production of pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways. Talking to them in a sexually explicit manner is also a form of sexual abuse.
- 3.3.2. Children are also abused by other young people. Children living away from home are vulnerable to abuse by their peers. A significant proportion of sex offences are caused by teenagers and, on occasion, by young children.
- 3.3.3. Usually, in cases of sexual abuse, it is the child's behaviour which may cause you to become concerned, although physical signs can also be present. In all cases, children who talk about sexual abuse do so because they want it to stop. It is important, therefore, that they are listened to and taken seriously.

3.4. PHYSICAL ABUSE

- 3.4.1. This may involve hitting, biting, shaking, poisoning, burning or scalding, drowning or suffocating, alcohol or drug abuse or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer feigns the systems of, or deliberately causes ill health to a child who they are looking after. This condition is known as fictitious induced illness by proxy.

- 3.4.2. Most children will collect cuts and bruises in their daily life. These are likely to be in places where there are bony parts of their body, like elbows, knees and shins – See Chart: Injury Sites.
- 3.4.3. An important indicator of physical abuse is where bruises or injuries are unexplained or the explanation does not fit the injury, or when it appears on parts of the body where accidental injuries are unlikely, e.g. on the cheeks or thighs. A delay in seeking medical treatment when it is obviously necessary is also a cause for concern. Bruising may be more or less noticeable on children with different skin tones or from different racial groups and specialist advice may need to be taken.

3.5. NEGLECT

- 3.5.1. Persistent failure to meet a child's basic physical and/or psychological needs to an extent that is likely to result in serious impairment of the child's health or development. For example, failing to provide adequate food, shelter and warm clothing, failing to protect a child from physical harm or danger, consistently leaving children alone and unsupervised, or failing to ensure access to appropriate medical care or treatment. Refusal to give children love, affection and attention can also be a form of neglect.

3.6. EMOTIONAL ABUSE

- 3.6.1. The persistent emotional ill-treatment of a child likely to cause severe and lasting adverse effects on the child's emotional development. A persistent lack of love or affection, where a child is constantly shouted at or taunted, making a child very nervous or withdrawn constitutes emotional abuse.
- It may involve communication to a child that they are worthless or unloved, inadequate, or valued only in terms of meeting the needs of another person.
 - It may feature expectations that are not appropriate to their age or development.
 - It may cause children to be frightened or in danger, and put them at greater risk of exploitation or corruption.
- 3.6.2. Racism can be categorised as emotional abuse. Emotional abuse can also take the form of children not being allowed to mix/play with the other children. Emotional abuse can be difficult to measure and often children who appear well cared for may be emotionally abused.

3.7. DISABLED CHILDREN

- 3.7.1. Some disabled children and adults are mentally or physically more vulnerable than others, which makes it easier for abusers to exploit them. A 'vulnerable adult' is any adult with learning or physical disability or physical or mental illness, which results in them being incapable of protecting themselves. The principles of child protection also apply to vulnerable adults above the age of 18 years, for which a separate policy is available.
- 3.7.2. Disabled children may also find it more difficult to recognise and report abuse, and to be believed. Some children face additional vulnerability and barriers to getting help because of their race, gender, age, religion or disability, sexual orientation, social background and culture. Prejudice and discrimination (including racism) can prevent some children getting the help they need.

4. BULLYING

- 4.1. The majority of calls to help lines from children relate to bullying. Adult representatives of Wolverhampton Wanderers Football Club have a duty of care to safeguard children from harm including disabled children and others who may be particularly vulnerable.
- 4.2. Victims are often shy, sensitive and perhaps anxious or insecure. They can be singled out for physical reasons, being overweight, physically small or belonging to a different race, faith, culture, or class. Children are vulnerable to abuse by their peers.
- 4.3. Bullying most commonly occurs in any place where there is inadequate supervision.
- 4.4. Children participating in any activities at Wolverhampton Wanderers Football Club have the right to be safe and happy. Bullying by Wolverhampton Wanderers employees, volunteers, parents or other children will not be tolerated.
- 4.5. As a representative of Wolverhampton Wanderers Football Club, you have a responsibility to take all signs of bullying seriously.
- 4.6. If the perpetrator of bullying is a colleague then the procedure for reporting a concern should be followed.
- 4.7. Action to prevent Bullying and to help the victim:
 - Encourage all children to speak and share their concern. Help the victim to speak out to tell the person in charge or someone in authority. Create an open environment.
 - Reassure the victim that you can be trusted and will help them, although you cannot promise to tell no one else.
 - Keep records of what was said (what happened, by whom and when).
- 4.8. Action towards a child who is bullying

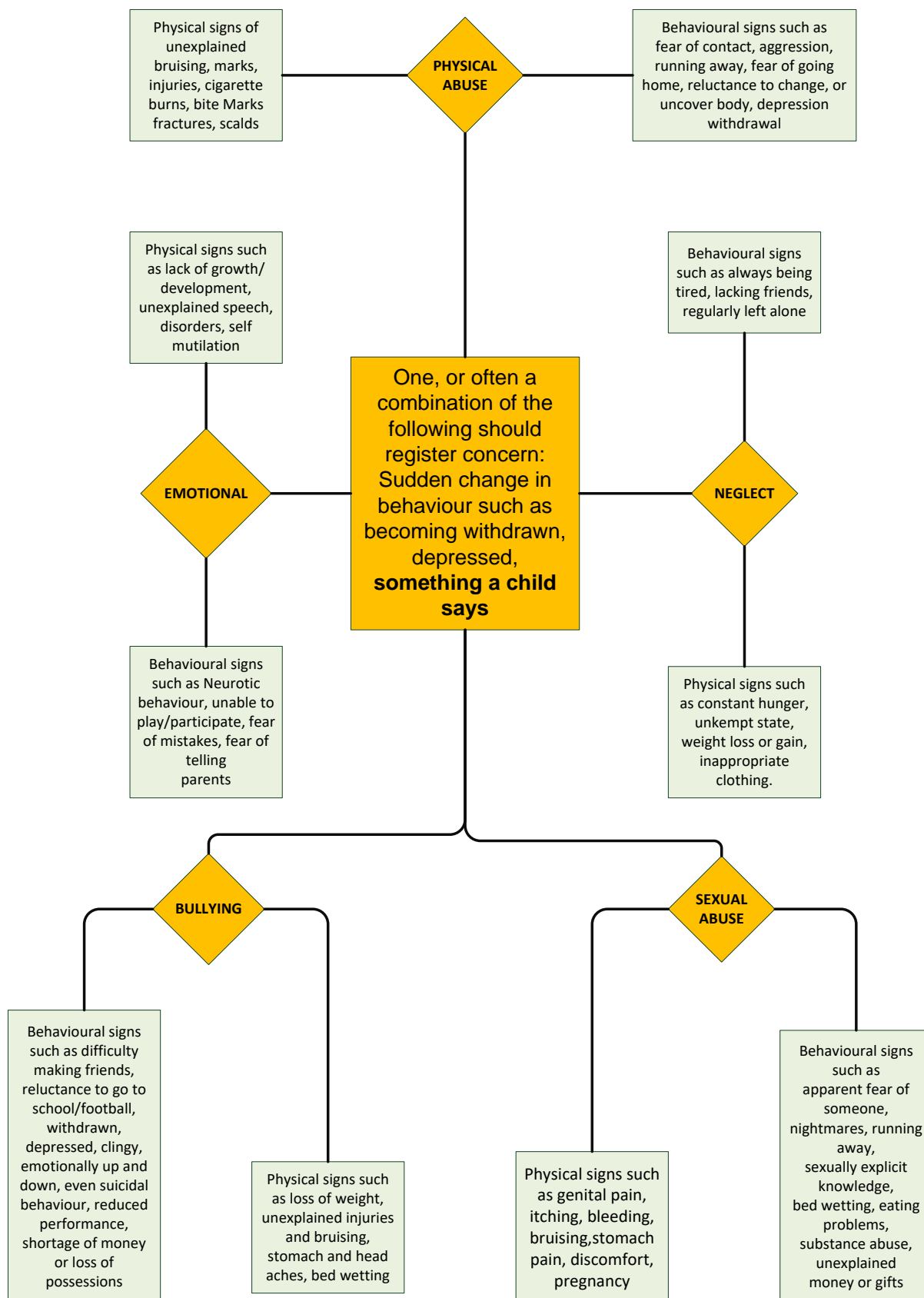
The Coach or Head of Department should:

- Talk with the bully/ies, explain the situation and try to get the bully/ies to understand the consequences of their behaviour.
- Obtain an apology from the bully/ies to the victim.
- Inform the bully's parents.
- Insist on the return of "borrowed" items.
- Hold discussions amongst staff to agree specific strategies to combat bullying. Provide support for the Coach of the victim.
- Improve sanctions against bullies (including the possibility of expulsion).
- Encourage and support the bully to change behaviour.
- Hold a follow up meeting with the victim's family to report on progress.
- Inform all relevant members of staff about incidents and action taken.

5. RADICALISATION & EXTREMISM

- 5.1. The terrorist threats we face now are more diverse than before, dispersed across a wider geographical area, and often in countries without effective governance. We therefore face an unpredictable situation, with potentially more frequent, less sophisticated terrorist attacks.
- 5.2. In order for Wolverhampton Wanderers to fulfil the government 'Prevent' duty, it is essential that staff are able to identify where children or vulnerable adults could be open to radicalisation, and know what to do when they are identified. Protecting those groups from the risk of radicalisation should be seen as part of our wider safeguarding duties, and is similar in nature to protecting children from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences.
- 5.3. There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in behaviour which could indicate that they may be in need of help or protection. Those at risk of radicalisation may display different signs or seek to hide their views. Staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately.
- 5.4. Even very young children may be vulnerable to radicalisation by others, whether in the family or outside, and display concerning behaviour. The 'Prevent' duty does not require staff to carry out unnecessary intrusion into family life but as with any other safeguarding risk, they must take action when they observe behaviour of concern.
- 5.5. Designated Safeguarding Lead undertakes 'Prevent' awareness training and is able to provide advice and support to other members of staff on protecting children from the risk of radicalisation. It is recognised that it can be more difficult for many to attend training and we are considering other ways in which they can increase their awareness and be able to demonstrate that.
- 5.6. As explained above, if a member of staff has a concern about a particular child or adult they should follow the club's normal safeguarding procedures, including discussing with the designated safeguarding lead. In 'Prevent' priority areas, the local authority will have a Prevent lead who can also provide support. You can also contact your local police or dial 101 (the non-emergency number). They can talk to you in confidence about your concerns and help you gain access to support and advice.
- 5.7. Concerns can also be raised by email counter.extremism@education.gsi.gov.uk. Tele: 020 7340 7264
- 5.8. Please note that the helpline is not intended for use in emergency situations, such as a child being at immediate risk of harm or a security incident, in which case the normal emergency procedures should be followed.

5.9. signs and symptoms of abuse chart



6. STAFF RECRUITMENT

- 6.1. Wolverhampton Wanderers Football Club recognises that anyone may have the potential to harm or abuse children in some way and is committed to taking all reasonable steps to ensure that unsuitable people are prevented from working with children or young adults.

6.1. SAFER RECRUITMENT

- 6.1.1. Wolverhampton Wanderers FC hold a culture of safe recruitment and, as part of that, adopt recruitment procedures that help deter, reject or identify people who might abuse children. This part of the guidance describes in detail those checks that are, or may be, required for any individual working in any capacity at the club. Wolverhampton Wanderers must act reasonably in making decisions about the suitability of the prospective employee based on checks and evidence including Disclosure and Barring Service (DBS), barred list checks together with references and interview information. The level of DBS certificate required, and whether a prohibition check is required, will depend on the role and duties of an applicant. The club follows as closely as possible the EFL guidance on Roles in Football in respect of DBS checks
- 6.1.2. The clubs full recruitment policy and procedures are available from the Executive Assistant. These include information and guidelines on advertising, selection procedures, offers of employment, checks and references.
- 6.1.3. Further policies and procedures relating to employment are available from the HR Department, on the Intranet and in the Employee Handbook.

6.2. PRE-SELECTION

- 6.2.1. When recruiting for a position that involves significant contact with children or young adults, Wolverhampton Wanderers operates a comprehensive recruitment procedure that includes:
- Completion of an Application Form that elicits information regarding an applicants past
 - Completion of a Self Disclosure Form, which requires any applicant to declare past offences
 - Verification of identity and eligibility to work in the UK
 - Verification of professional qualifications
 - Screening via the Disclosure and Barring Service
 - Two references, including one regarding the applicant's most recent post working with children
 - Registration with the appropriate professional body (if applicable)

6.3. INTERVIEW

- 6.3.1. Applicants will be required to undergo an interview to acceptable protocol and recommendations that includes questions relevant to Safeguarding Children.
- 6.3.2. The applicant's qualifications, identity and eligibility to work in the UK are also substantiated, and any areas for concern discussed.

6.4. POST – INTERVIEW

- 6.4.1. In the event that the DBS check reveals undisclosed offences or issues are raised in the references and pre-employment checks, an interview will be convened at the earliest opportunity to include the Executive Assistant and Safeguarding Services Manager. An offer of employment can be withdrawn if this interview fails to satisfy the interviewers of the employee's suitability to work with children.
- 6.4.2. In the event that an applicant commences work prior to their DBS disclosure being received, they will be restricted from working with children and young adults unsupervised.

6.5. INDUCTION

- 6.5.1. All employees will receive a formal and informal induction. As part of this induction process, each employee will be made aware of Wolverhampton Wanderers's Safeguarding Children Policy and Procedures.

6.6. TRAINING

- 6.6.1. In addition to the promotion of employee's attending the F.A.'s Safeguarding Children workshops (where relevant), and reading the Safeguarding Children Policy and Procedures, the club will ensure that each person working with children:
- Recognises their responsibilities to report any concerns about suspected poor practices or abuse
 - Responds appropriately to concerns expressed by a child or young person
 - Works safely and effectively with children or vulnerable people and protects themselves from false allegations by understanding best practice.

7.7 EXTERNAL AGENCIES/PARTNERS

- 7.7.1 Any external agency or partner who will be engaged in any activity with a child or vulnerable adult, (whether supervised or unsupervised), will be subject of a current DBS check. No person will be allowed any unsupervised activity with a child or vulnerable adult without having undergone a DBS check.

7. POLICY STATEMENT ON THE RECRUITMENT OF EX OFFENDERS

- 7.1. As an organisation using the Disclosure and Barring Service (DBS), to assess applicant's suitability for positions of trust, Wolverhampton Wanderers Football Club Company Limited complies fully with the DBS Code of Practice and undertakes to treat all applicants for positions fairly. It undertakes not to discriminate unfairly against any subject of a Disclosure on the basis of conviction or other information revealed.
- 7.2. Wolverhampton Wanderers Football Club is committed to the fair treatment of its staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependants, age, physical/mental disability or offending background.
- 7.3. We actively promote equality of opportunity for all with the right mix of talent, skills and potential and welcome applications from a wide range of candidates, including those with criminal records. We select all candidates for interview based on their skills, qualifications and experience.
- 7.4. A Disclosure is only requested after a thorough risk assessment has indicated that one is both proportionate and relevant to the position concerned. For those positions where a Disclosure is required, all application forms, job adverts and recruitment briefs will contain a statement that a Disclosure will be requested in the event of the individual being offered the position.
- 7.5. Where a Disclosure is to form part of the recruitment process, we encourage all applications called for interview to provide details of their criminal record at an early stage in the application process. We request that this information is sent under separate, confidential cover, to a designated person within Wolverhampton Wanderers Football Club and we guarantee that this information will only be seen by those who need to see it as part of the recruitment process.
- 7.6. Unless the nature of the position allows Wolverhampton Wanderers Football Club to ask questions about an applicants' entire criminal record we only ask about 'unspent' convictions as defined in the Rehabilitation of Offenders Act 1974 as amended by the guidance of March 2014.
- 7.7. Wolverhampton Wanderers Football Club ensures that all those in Wolverhampton Wanderers Football Club who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences. We also ensure that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974 as amended by the guidance of March 2014.
- 7.8. At interview, or in a separate discussion, we ensure that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment.
- 7.9. Wolverhampton Wanderers Football Club makes every person subject of a DBS disclosure aware of the existence of the DBS Code of Practice and makes a copy available on request.
- 7.10. Wolverhampton Wanderers Football Club undertakes to discuss any matter revealed in a Disclosure with the person seeking the position before withdrawing a conditional offer of employment.

- 7.11. **Having a criminal record will not necessarily bar you from working with us. This will depend on the nature of the position and the circumstances and background of your offences.**

8. DISCLOSURE & BARRING SERVICE

8.1. INTRODUCTION

- 8.1.1. The DBS helps organisations to protect children by screening out those who may be unsuitable to work with them. Disclosure is complimentary to the Club's recruitment practice.

8.2. WHAT IS DISCLOSURE?

- 8.2.1. Disclosures provide details of a person's criminal record including convictions, cautions, reprimands and warnings held on the Police National Computer (P.N.C). Disclosures also contain details from lists held by the Department of Health and the Department for Education and Skills (DFES) of those considered unsuitable for this kind of work.

8.3. POLICY

- 8.3.1. No person working for the Club as a paid professional or as a volunteer shall have direct or unsupervised contact with children until the Club has received satisfactory DBS disclosure.
- 8.3.2. However, whilst awaiting disclosure the person may work with children under the supervision of a member of staff who has been cleared, subject to a Risk Assessment.
- 8.3.3. DBS disclosure will be repeated every three years.
- 8.3.4. All DBS requests for people working with children will be assessed and the EFL guidance 'Roles in Professional Football' followed and where required, an 'Enhanced' disclosure will be completed.
- 8.3.5. Wolverhampton Wanderers Football Club has made it a policy that every member of staff for whom a DBS check reveals offences or concerns will be interviewed by the Safeguarding Services Manager and Executive Assistant. A record of such an interview may be stored securely. Information relating to an individual will be treated confidentially and only shared with specific people in the Club on a 'need-to-know basis'.
- 8.3.6. As part of the recruitment process, each applicant for a post is required to complete a self-declaration form. It may be a disciplinary offence not to declare an offence on this form. The form should be submitted to the Head of Human Resources marked '**Private and Confidential**'.

8.4. SELF-DECLARATION OF INFORMATION IN BETWEEN DISCLOSURE APPLICATIONS

- 8.4.1. Wolverhampton Wanderers place trust and confidence in their staff. If during their time working with the Club, a member of staff feels that they have been compromised or have been accused of anything which can be construed as an offence (e.g. subject of a caution, reprimand by the Police or subject to a disciplinary sanction from the FA or other organisations relating to children), then staff are expected to share this information with the Club by notifying their manager in writing. This ensures that everyone is working in an open and trustworthy manner.
- 8.4.2. The Club would like to reassure staff that the main consideration is whether the offence is one that makes the person unsuitable for their type of work.

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- 8.4.3. Failure to declare information will inevitably does damage to the spirit of trust and confidence between the Club and staff member and will be treated as a serious matter.
- 8.4.4. The Club is a 'Registered Body' with the DBS and complies with the DBS code of practice, guidance and advice. The only DBS disclosure that will be portable is when an employee or applicant holds a FACA Disclosure form.
- 8.4.5. A Disclosure form is retained for no longer than 6 months after which it is shredded. The Club only retains information on the name, position, type of disclosure, Date of issue, Disclosure Reference Number and Recruitment decision. The information is stored on a secure database.

9. POLICY STATEMENT ON GDPR - THE SECURE STORAGE, HANDLING, USE, RETENTION AND DISPOSAL, DISCLOSURES OF INFORMATION

9.1. GENERAL PRINCIPLES

- 9.1.1. As an organisation using DBS Service to help assess the suitability of applicants for positions of trust, Wolverhampton Wanderers FC complies fully with the DBS Code of Practice regarding the correct handling, use, storage and retention of disclosures information. It also complies fully with its obligations under the Data Protection Act and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of Disclosure information and has a written policy on these matters, which is available, to those who wish to see it on, request.

9.2. STORAGE ACCESS

- 9.2.1. Disclosure information is never kept on an applicant's personnel file and is always kept in a lockable filing cabinet in the lockable office of the Executive Assistant. Only Executive Assistant and Safeguarding Services Manager will have access to Disclosure information. In addition the Designated Safeguarding Officer from Wolverhampton Wanderers Foundation may have access to the Disclosure information pertaining to staff in their work-groups.

9.3. HANDLING

- 9.3.1. In accordance with Section 124 of the Police Act 1997, Disclosure information is only passed to those who are authorised to receive it in the course of their duties. We maintain a record of all those to whom Disclosures or Disclosure information has been revealed and we recognise that it is a criminal offence to pass this information to anyone who is not entitled to receive it.

9.4. USAGE

- 9.4.1. Disclosure information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

9.5. RETENTION

- 9.5.1. Once a recruitment decision has been made, we do not keep Disclosure information for any longer than is absolutely necessary. This information is retained in line with GDPR club policy and the conditions regarding safe storage and strictly controlled access will be of the highest regard.

9.6. DISPOSAL

9.6.1. Once the retention period has elapsed, we will ensure that any Disclosure information is immediately destroyed by secure means, i.e. by shredding. While awaiting destruction, Disclosure information will not be kept in any insecure receptacle. We will not keep any photocopy or other image of the Disclosure. However, notwithstanding the above, we may keep a record of the date of issue of a Disclosure, the name of the subject, the type of Disclosure requested, the position for which the Disclosure was requested, the unique reference number and the details of the recruitment decision taken.

9.7. ACTING AS AN UMBRELLA BODY

9.7.1. Wolverhampton Wanderers FC will not act as an Umbrella Body for any other individual or body.

10.8 Wolverhampton Wanderers FC will, upon receipt of any information relating to any previous conviction in respect of a full time/part time/temporary employee whether paid or otherwise, inform the designated body of DBS management of that conviction. This is a non-negotiable legal obligation and underpins the stance in respect of Safeguarding by the club.

10. STEWARDS SAFEGUARDING POLICY

- 10.1. All Wolverhampton Wanderers FC Stewards must adhere to this policy. Strict adherence to the Safeguarding policy will not only ensure the safety and welfare of our younger spectators, but also protect the integrity of our Stewards and our stewarding operation.
- 10.2. For the purpose of this policy a child will defined as a person under the age of 18 years.
- 10.3. All Stewards' supervisors who come into, or are likely to come into contact with children must have had Safeguarding-specific training and be fully conversant with this policy.
- 10.4. All Stewards working for Wolverhampton Wanderers FC must understand and accept that the underlying principle in their treatment of children is to ensure the safety and welfare of every child at all times.
- 10.5. The club's responsibility towards a child begins from the moment the child enters the ground and ends when the child leaves the ground.
- 10.6. Stewards should always work in pairs when dealing with children, so that they can corroborate what was said, done or heard in the event of an allegation of improper behaviour by a Steward.
- 10.7. It is deemed not good practice to search anyone who appears to be under the age of 14 years. If a search is considered necessary, a young male must be searched by a male Steward and a young female by a female Steward. Searches must be witnessed by a second Steward and a record should be made in the Steward's Handbook of any property that is confiscated and the child's name.
- 10.8. Lost children or parents/carers who have lost their child must know from notices placed around the stadium that they should contact the nearest Steward or Police Officer for immediate assistance. In the event that a child reports him/herself missing to a Steward, in order to prevent lone-working with a child, that Steward should pair up with another Steward as soon as possible.
- 10.9. The child should then be accompanied to the Stand manager for that area. At all times there should be two Stewards with the child.
- 10.10. The child should be verbally reassured and clear information gathered in order to locate the parent/carer accompanying the child to the match.
- 10.11. The information should be relayed to the Match day Control Room where a public announcement will be made.
- 10.12. Stewards must show maximum tolerance when dealing with children. Physical restraint must only be used as the very last resort, and then only to prevent the child harming him or her, or harming others or damaging property. It should never be used just to move a child from one position to another. Even in the rare event of a Steward needing to separate two fighting children, minimum force only may be used.
- 10.13. Only in the most extreme cases of misbehaviour will it be considered necessary to remove a child from the stadium. If his/her behaviour is so extreme as to cause actual or potential harm, he should be taken to a place of safety within the stadium complex as dictated by the Safety

Officer. The place of safety must have access to toilet facilities and a telephone. The usual place of safety will be the First Aid room. Parents should be contacted immediately and asked to collect their child as soon as possible. The child must be released into the care of an adult even if this means waiting until after the end of the match. The child must be accompanied by at least two stewards throughout the procedure. If the child is female, at least one of the stewards must be female.

- 10.14. In any of the incidents referred to above, the most senior Steward involved must make a written report of what was said, done and heard as soon as possible.
- 10.15. No children, including those who have been removed from the stadium may be photographed or videoed individually without parental permission.
- 10.16. Stewards will need to be especially protective of children during emergency or evacuation procedures. In such incidents a specific area must be allocated to unaccompanied and lost children in it.
- 10.17. If it is not possible to contact the parents/carers of a lost child, the child must be handed over to Police or Social Services as both organisations have a legal responsibility to take the child to a place of safety.
- 10.18. Stewards are entitled to ask any spectator his or her age so that he/she can be dealt with appropriately. If no answer is given, a Steward is entitled to make a decision based on the spectator's appearance and behaviour.

11. IMAGES OF CHILDREN'S PARTICIPATION IN ACTIVITIES

11.1. WHAT ARE IMAGES OF CHILDREN AND WHY HAVE A CODE OF PRACTICE ABOUT THEM?

11.1.1. Images are all photographs taken on film or digital cameras (including mobile phones) and all sorts of moving pictures – the terms “child” or “children” include anyone under the age of 18.

11.1.2. There has been much talk about whether it is safe to have images taken of children participating in sport. Whilst the great majority of images are appropriate and are taken in good faith, it is a fact that images can be misused and children can be put at risk if common – sense procedures are not observed.

11.1.3. To set out procedures, this Code of Practice has been adapted from the Premier League Code of Practice.

11.2. AIMS OF THE CODE OF PRACTICE

11.2.1. First, as in all matters concerned with the Safeguarding of Children, Wolverhampton Wanderers Football Club strive to achieve good practice, this policy aims to avoid three potential sources of child abuse; the use, adaptation, or copying of images for child pornography, either on the internet or in print.

- The possible identification of a child when an image is accompanied by significant personal information which can lead to the child being ‘groomed’.
- The identification and locating of children where there are safeguarding children concerns. Such cases would include, for example, children who could be compromised by an image because
 - They are removed from their family home for their own safety
 - There are restrictions on their contact with one parent following a parental separation
 - They are a witness in criminal proceedings
 - Their name is placed on a Local Authority Child Protection Register

11.3. FURTHER ASSISTANCE

11.3.1. For further assistance about this code of practice, please contact

- The Safeguarding Services Manager at the Club

11.4. THE CODE OF PRACTICE – GENERAL CONSIDERATIONS

11.4.1. Personnel at Wolverhampton Wanderers Football Club should:

- Communicate as widely as possible the Club's approach to the recording of images, saying that it's policy is designed to encourage best practice in the safeguarding of children and to prevent abuse if possible.
- Ensure parents, carers and children are told about the Club's images policy before the child participates in an Wolverhampton Wanderers activity.
- Obtain parents' or carers' consent to take images of the child for the purposes of the Club.
- Report any instances of inappropriate images to their line manager or the Safeguarding Services Manager without delay.

11.4.2. Clubs should not (subject to the exception of Football Academy Scholarship Students and any professional players under the age of 18)

- Publish images with the full name(s) and details of the individual child(ren) in the Club Programme or place images containing that information either on the Club website or in the press. It is suggested that only a christian name is used to accompany a photo.
- Use an image for something other than that which it was initially agreed, e.g. published in the press when initially produced for a personal commemorative picture.
- Allow images to be taken by anyone in changing rooms, showers and toilets or anywhere else where children might be undressed.

11.4.3. Clubs should remember

- It is not an offence for someone to take appropriate photographs on public property, even if asked not to do so.
- Clubs cannot decide who can and can't take images on public property.
- Clubs can decide who can and can't take images on private property. If photographers do not comply with the Club's requirements, then they may be asked to leave.

11.5. THE CODE OF PRACTICE – THE PHOTOGRAPHERS

11.5.1. The aim of each photographer should be to help celebrate and promote football.

When taking an image they should be asked to:

- focus on the activity rather than the individual child
- include groups of children rather than individuals if possible
- ensure all those featured are appropriately dressed (a minimum of vest or shirt and shorts)
- represent the broad range of youngsters participating in football – boys and girls, disabled children, members of minority ethnic communities.

11.6. DESIGNATED CHILDREN'S PHOTOGRAPHERS

11.6.1. One or more professional photographers engaged by the Club and those Club Staff who take images of children engaging in specific activities (for example Staff in the Wolverhampton Wanderers Academy) should be listed as Designated Children's Photographers.

11.6.2. To achieve this:

- Wolverhampton Wanderers Football Club will screen and train all Designated Children's Photographers before they are included on an official list.
- we will screen proposed photographers for their suitability (just as we would check any other member of staff or volunteer working with children) and then provide training for them in the Club's Safeguarding Children policies and procedures.

11.7. THE DESIGNATED CHILDREN'S PHOTOGRAPHER'S INSTRUCTIONS

11.7.1. A Designated Children's Photographer (whether a professional photographer or member of Club Staff) will receive clear instructions, preferably in writing, from the Club at an early stage.

- Wolverhampton Wanderers Football Club will provide them with a clear brief about what is appropriate in terms of content. Images will not be allowed to be taken outside the activity being covered.
- Wolverhampton Wanderers Football Club reserve the right to determine who will hold the images recorded and what is to be done with them.

11.8. PARENTS, RELATIVES, FRIENDS AND THE CHILDREN THEMSELVES

11.8.1. Parents, relatives and friends may want to take their own images of 'their' child at the professional club and the child too may want to take his/her own record, however this cannot be permitted.

11.8.2. For the Academy girl's football and Wolves Compton Park Academy, it should be made clear in writing that only the Club's Designated Children's Photographers, and the Designated Children's Photographers from a Club against which a team is playing, may take images. The team representing Wolverhampton Wanderers Football Club will place the onus on the officials connected with the opposing team to ensure that each player has parental consent to be photographed or filmed by the official photographers.

11.9. OFFICIAL IMAGES – OUR DESIGNATED CHILDREN'S PHOTOGRAPHERS

11.9.1. Normally we use only Designated Children's Photographer's – people who have been screened and specially trained, who are either professional photographer's or members of the Club's staff.

11.10. UNOFFICIAL IMAGES – TAKEN BY PARENTS, CARERS, FAMILY, FRIENDS AND THE CHILDREN THEMSELVES

11.10.1. If your child's activity is not at our Compton Park Academy and you want to take your own unofficial images, please ask. If it is possible, we'll let you know when and where you can take them. However, we can't always say "yes" to image taking and we ask you to respect our decision if we are unable to allow it.

11.10.2. Posing for unofficial images can get in the way of some Activities, but another more important reason for our saying "no" is that it is sometimes against the law to take images of particular images – for instance, in cases where children have been removed from their family for their own safety, where there are disputes between parents, have refused consent. In situations like these no image taking by anyone at all, including our Designated Children's Photographer, is possible.

Whatever you do, don't try to take "secret" pictures. This can lead to a multitude of problems if someone else spots you, thinks that you are acting suspiciously towards children and reports you to the Club or to the Children's Authorities.

11.11. FURTHER INFORMATION

11.11.1. Our approach to the taking of children's images is part of our commitment to Safeguarding Children at the Club. If you want to find out more, please contact the Safeguarding Services Manager

12. SOCIAL MEDIA

13.1 All employees be that full time, part time or casual staff when using social media can be seen as acting as an ambassador of Wolves. This is a great responsibility and honour and when using Social Media you must ensure you act appropriately.

13.1.1 Social media includes websites like Twitter and Facebook but also Apps such as Instagram and Snapchat however, the list is extensive. It is both instantaneous and public. Every tweet, post or comment made is potentially a public statement.

13.1.2 All staff, including the Managing Director, Team Coach and Playing Staff, are expected to respect and uphold the reputation and traditions of the Club in all of their public statements and conduct.

13.1.3 Accepting 'Friends' or 'Follow' requests is at your discretion whereas with other platforms this can be beyond your control.

13.1.4 It is strictly a matter of policy that no staff member should 'follow' or allow themselves to be followed by any Wolverhampton Wanderers FC under 18 Academy or Staff member.

13.1.5 It must be borne in mind that any person under the age of 18 is a child and therefore is subject of the Wolverhampton Wanderers FC Safeguarding Children Policy.

13.1.6 The Safeguarding of children and vulnerable adults is a priority for Wolverhampton Wanderers and any person found breaching this policy will be subject of disciplinary procedures which may result in verbal warnings, written warnings or dismissal.

13.1.7 Unacceptable practice examples:

- Sending inappropriate text messages or social media messages to children or vulnerable adults.
- Having children or vulnerable adults engaged with the club as 'friends' or 'followers' within social networking sites such as Facebook, Twitter and Instagram
- Engaging with children or vulnerable adults on 'one to one' personal electronic communications.

13.1.8 There are of course exceptions and this would include immediate family members who work within the club for example

13. SAFEGUARDING PROCEDURES FOR COMPTON PARK ACADEMY

13.1. INTRODUCTION

13.1.1. These guidelines are intended to aid personnel representing Wolverhampton Wanderers Compton Park Academy who may be in a 'Position of Trust'. This means that they are involved in caring for, training, supervising or being in sole charge of a child or young person and in the course of their duties may have unsupervised contact with a child or young person. As an employee or representative of Wolverhampton Wanderers you have a duty of care towards all of the children that you come into contact with in the course of your employment.

13.2. GOOD PRACTICE

13.2.1. Coaches, officials and volunteers should protect themselves and promote good practice by following these guidelines:

- Always be publicly open when working with young people. Avoid situations where you and an individual child are alone and completely unobserved. If it is necessary to speak with a player one to one, it is advisable to draw the player to one side so that although private, the discussion may take place in full view of others. If it is considered that such a discussion will benefit from being away from others, a meeting should be organised with the knowledge of a senior member of staff. If possible another member of staff should always be present or doors left open. Whenever possible, parents should be present at such meetings. There should be nothing said to a young person that parents cannot hear.
- If any form of manual support is necessary it should be provided openly and in accordance with the FA Safeguarding & EFL guidelines.
- If young people have to be supervised in changing rooms, coaches, etc. should always work in pairs. Coaches, needing to talk to young people in changing rooms should always check when, or if it is appropriate to enter the changing area. If this is likely to be the case then it should be explained to the parents prior to their child's involvement.
- Coaches etc. should also be aware that as a general rule they should not travel alone in a car with a child, however short the journey. They should not spend excessive time alone with young people away from others without undertaking a risk assessment and consulting with the Club Safeguarding Services Manager or another senior member of staff.

13.2.2. Coaches, etc. should never:

- Engage in rough, physical or sexually provocative games including horseplay and tickling
- Share a room with a child
- Allow or engage in any form of inappropriate touching
- Allow young people to use inappropriate language unchallenged
- Make sexually suggestive comments to a child or young person even in fun
- Allow allegations by a young person to go unchallenged, unrecorded or not acted upon.
- Do things of a personal nature for a child when they can do it for themselves
- Invite or allow a young person to visit or stay at your home unsupervised
- Sending inappropriate text messages or social media messages to children and young people **(see Social Media Item 13)**
- Having children engaged with the club as 'friends' or 'followers' within social networking sites such as Facebook, Twitter and Instagram **(see Social Media Item 13)**
- Engaging with children and young people on 'one to one' personal electronic communications. **(see Social Media Item 13)**

- 13.2.3. If a coach or any other person, etc. accidentally hurts a child or causes them distress or the child appears to be sexually aroused by your actions or misunderstands or misinterprets something you have done, report any such incidents as soon as possible to a colleague and as soon as reasonably practicable a Senior Member of Staff who will note of the incident appropriately and inform the Club Safeguarding Services Manager.

14. GUIDELINES ON DEALING WITH POOR PRACTICE, ABUSE & BULLYING

- 14.1. Recognising abuse is not easy. Most children receive cuts, grazes and bruises from time to time and their behaviour may give reason for concern. There may well be reasons for these factors other than abuse, but any concern should immediately be discussed with the Club Safeguarding Services Manager to assess the situation.

Warning signs that may alert coaches to the possibility of abuse can include:

- Unexplained bruises, cuts or burns on the child, particularly if these are on parts of the body not normally injured in accidents.
- An injury that a parent or carer tries to hide or for which the child or parent gives different explanations.
- Changes in behaviour such as the child suddenly becoming very quiet, tearful, withdrawn, aggressive or displaying severe tantrums,
- Loss of weight without a medical explanation
- An inappropriately dressed child or ill-kept child who may also be dirty
- Sexually explicit behaviour, for instance playing games and showing awareness that is inappropriate for the child's age.
- Continual masturbation, aggressive or inappropriate sexual play.
- Running away from home, attempted suicides, self-inflicted injuries or high risk-taking behaviour.
- A lack of trust in adults, particularly those who would normally be close to the child.
- Disturbed sleep, nightmares and bed-wetting particularly if a child has previously been dry.
- Eating problems including over-eating or a loss of appetite

REMEMBER, IT IS YOUR RESPONSIBILITY TO ACT ON ANY CONCERNS!

14.1. LISTENING TO THE CHILD

- Listen carefully to any complaint or allegation by the child. Tell the child and show them that you are taking them seriously
- React calmly so as not to frighten the child
- Tell the child that they are not to blame and that it was right to tell
- Do not accuse or leap to conclusions yourself. **Do not probe. Do not ask leading questions**
- **Keep questions to a minimum**. Never stop a child who is freely recalling an event.
- Always reassure a child but do not make promises of confidentiality.
- Complete the "Cause for Concern" report attached to the back of this guide as soon as possible using direct quotes where you can recall them exactly.
- Do not ask a child to repeat a disclosure to another adult
- Report your concerns to the Club Safeguarding Services Manager

14.2. TALKING TO PARENTS AND CARERS

14.2.1. Always discuss your concerns with the Club Safeguarding Services Manager. There may be circumstances where a parent is implicated in alleged abuse. Contact with parents could be delayed until you have sought advice from one of the professional agencies who have been notified.

14.3. RESPONDING TO ABUSE: WHAT TO DO IF YOU ARE CONCERNED

14.3.1. It is not your responsibility to decide if child abuse has occurred, but it is your responsibility to take action, however small your concern.

14.3.2. Inform the Club Safeguarding Services Manager who will take responsibility for seeking any additional advice and for contacting the local Children and Families Social Care Department, the Police or NSPCC who are trained to deal with such situations and have the necessary legal power to protect the child.

14.3.3. In the event that the Club Safeguarding Services Manager is unavailable to consult and there is some urgency about the child's circumstances, you should contact one of the above services yourself. Social Workers should be happy to discuss a scenario to advise on whether a full referral is necessary.

14.3.4. Additionally contact can be made with the Local Authority Designated Officer (LADO) to discuss the scenario of your concern.

14.4. ALLEGATIONS OF ABUSE AGAINST A MEMBER OF STAFF/VOLUNTEER

14.4.1. Any concern should be referred to the Club Safeguarding Services Manager so that the appropriate safeguarding procedure can be followed

14.4.2. If your concern is about the Club Safeguarding Services Manager, then contact the Executive Assistant at Wolverhampton Wanderers FC

14.4.3. CONFIDENTIALITY

14.4.4. It is crucial that confidentiality is maintained for all concerned. Information should be handled and shared on a need to know basis only.

This includes the following people:

- The Club Safeguarding Services Manager
- The Wolverhampton Wanderers FC Education & Welfare Officer
- The Parents of the child who is alleged to have been abused
- LA Children's Services Directorate/ Police/ NSPCC

15. SAFEGUARDING PROCEDURES FOR WOLVES FOUNDATION

15.1. INTRODUCTION

15.1.1. This policy is intended to aid personnel representing Wolves Foundation who may be in a 'Position of Trust'. This means that they are involved in caring for, training, supervising or being in sole charge of a child or young person and in the course of their duties may have unsupervised contact with a child or young person.

15.1.2. As an employee or representative of Wolverhampton Wanderers FC you have a duty of care towards all of the children that you come into contact with in the course of your employment.

15.1.3. The guide refers to the Wolves Foundation Safeguarding Officer. At present this position is held by Laura Nicholls.

15.1.4. Coaches, officials and volunteers should protect themselves and promote good practice by following these guidelines

- Always be publicly open when working with young people. Avoid situations where you and an individual child are alone and completely unobserved. If it is necessary to speak with a player one to one, it is advisable to draw the player to one side so that although private, the discussion may take place in full view of others. If it is considered that such a discussion will benefit from being away from others, a meeting should be organised with the knowledge of a senior member of staff. If possible another member of staff should always be present or doors left open. Whenever possible parents should be present at such meetings. There should be nothing said to a young person that parents cannot hear.
- If any form of manual support is necessary it should be provided openly and in accordance with the FA Safeguarding/EFL guidelines, i.e., "avoid unnecessary physical contact. Touching can be ok and appropriate as long as it is not intrusive or disturbing to the player. If there is need for physical contact (e.g., in guiding players into position on the training field or comforting a young player who is upset), be thoughtful. You should first ask the player's permission and be sensitive to their reaction and respond appropriately".
- If young people have to be supervised in changing rooms, coaches, etc. should always work in pairs. Coaches, needing to talk to young people in changing rooms should always check when, or if it is appropriate to enter the changing area. If this is likely to be the case then it should be explained to the parents prior to their child's involvement.
- Coaches etc. should also be aware that as a general rule they should not travel alone in a car with a child, however short the journey. They should not spend excessive time alone with young people away from others without undertaking a risk assessment and consulting with the Safeguarding Services Manager or another senior member of staff at Wolves Foundation

15.1.5. Coaches and/or officials also must not:

- Engage in rough, physical or sexually provocative games including horseplay and tickling
- Share a room with a child
- Allow or engage in any form of inappropriate touching
- Allow young people to use inappropriate language unchallenged
- Make sexually suggestive comments to a child or young person even in fun
- Allow allegations by a young person to go unchallenged, unrecorded or not acted upon.
- Do things of a personal nature for a child when they can do it for themselves
- Invite or allow a young person to visit or stay at your home unsupervised

15.1.6. If a coach, or any other person accidentally hurts a child or causes them distress or the child appears to be sexually aroused by your actions or misunderstands or misinterprets something you have done, report any such incidents as soon as possible to a colleague (preferably the Safeguarding Services Manager), and make a brief note of it.

15.2. IDENTIFYING SIGNS OF POSSIBLE ABUSE

15.2.1. Recognising abuse is not easy. Most children receive cuts, grazes and bruises from time to time and their behaviour may give reason for concern. There may well be reasons for these factors other than abuse, but any concern should immediately be discussed with the Safeguarding Officer to assess the situation.

15.2.2. Warning signs that may alert coaches to the possibility of abuse can include:

- Unexplained bruises, cuts or burns on the child, particularly if these are on parts of the body not normally injured in accidents.
- An injury that a parent or carer tries to hide or for which the child or parent gives different explanations.
- Changes in behaviour such as the child suddenly becoming very quiet, tearful, withdrawn, aggressive or displaying severe tantrums,
- Loss of weight without a medical explanation
- An inappropriately dressed child or ill-kept child who may also be dirty
- Sexually explicit behaviour, for instance playing games and showing awareness that is inappropriate for the child's age.
- Continual masturbation, aggressive or inappropriate sexual play.
- Running away from home, attempted suicides, self-inflicted injuries or high risk-taking behaviour.
- A lack of trust in adults, particularly those who would normally be close to the child.
- Disturbed sleep, nightmares and bed-wetting particularly if a child has previously been dry.
- Eating problems including over-eating or a loss of appetite

REMEMBER, IT IS YOUR RESPONSIBILITY TO ACT ON ANY CONCERNS!

15.3. LISTENING TO THE CHILD

- Listen carefully to any complaint or allegation by the child. Tell the child and show them that you are taking them seriously
- React calmly so as not to frighten the child
- Tell the child that they are not to blame and that it was right to tell
- Do not accuse or leap to conclusions yourself. Do not probe. Do not ask leading questions
- Keep questions to a minimum. Never stop a child who is freely recalling an event.
- Always reassure a child but do not make promises of confidentiality.
- Complete the referral form as soon as possible using direct quotes where you can recall them exactly.
- Do not ask a child to repeat a disclosure to another adult
- Report your concerns to the Safeguarding Officer

15.4. TALKING TO PARENTS AND CARERS

15.4.1. Always discuss your concerns with the Club Safeguarding Services Manager. There may be circumstances where a parent is implicated in alleged abuse. Contact with parents could be

delayed until you have sought advice from one of the professional agencies who have been notified.

15.5. RESPONDING TO ABUSE: WHAT TO DO IF YOU ARE CONCERNED

- 15.5.1. It is not your responsibility to decide if child abuse has occurred, but it is your responsibility to take action, however small your concern.
- 15.5.2. Inform the Club Safeguarding Services Manager who will take responsibility for seeking any additional advice and for contacting the local Children and Families Social Care Department, the Police or NSPCC who are trained to deal with such situations and have the necessary legal power to protect the child.
- 15.5.3. In the event that the Club Safeguarding Services Manager is unavailable to consult and there is some urgency about the child's circumstances, you should contact one of the above services yourself. Social Workers should be happy to discuss a scenario to advise on whether a full referral is necessary.
- 15.5.4. Additionally contact can be made with the Local Authority Designated Officer (LADO) to discuss the scenario of your concern.

15.6. ALLEGATIONS OF ABUSE AGAINST A MEMBER OF STAFF/VOLUNTEER

- 15.6.1. Any concern should be referred to the Club Safeguarding Services Manager so that the appropriate safeguarding procedure can be followed
- 15.6.2. If your concern is about the Club Safeguarding Services Manager, then contact the Executive Assistant at Wolverhampton Wanderers FC
- 15.6.3. **CONFIDENTIALITY**
- 15.6.4. It is crucial that confidentiality is maintained for all concerned. Information should be handled and shared on a need to know basis only.

This includes the following people:

- The Club Safeguarding Services Manager
- The Wolverhampton Wanderers FC Education & Welfare Officer
- The Parents of the child who is alleged to have been abused
- LA Children's Services Directorate/ Police/ NSPCC

Information and guidance can also be obtained freely from the EFL and the Birmingham County FA Safeguarding Officer (Currently Richard Watson). Please Page 33 '**Useful Contacts**' for details

16. USEFUL CONTACTS

INTERNAL CONTACTS

Safeguarding Services Manager: Paul Richards

Mobile: 07833 051063

Email: paulrichards@wolves.co.uk

Education & welfare Officer - Wolves Academy: Nick Loftus - Head of Education & Welfare

Mobile: 07968 947554

Email: nataliedeakin@wolves.co.uk

Safeguarding Officer – Wolves Foundation Laura Nicholls

Tel: 01902 687033

Email: lauranicholls@wolves.co.uk

Executive Assistant/Human Resources: Lin Kennings

Tel: 01902 687035

Email: linkennings@wolves.co.uk

EXTERNAL CONTACTS

Premier League Head of Safeguarding: **Jess Addicott**

Premier League
30 Gloucester Place
London
W1U 8PL

T: +44 (0) 20 7864 9000

D: +44 (0) 20 7864 9173

M: +44 (0) 7917 204 890

E: jaddicott@premierleague.com

Wolverhampton Authority Safeguarding Board: (LADO)

Tel: 01902 550655/0661

Social Care Duty and Assessment Team 01902 555392

Emergency Duty Team (out of hours) 01902 55299

Local Authority Designated Officer
(Allegations against staff and Volunteers) 01902 550477

Police 101

Childline 0800 1111

FA/NSPCC Child Protection Helpline 0808 800 5000 (10.00am-6.00pm)

Birmingham County FA Safeguarding Officer Richard Watson

APPENDICES 1

WOLVERHAMPTON WANDERERS CLUB CODE OF CONDUCT

Wolverhampton Wanderers FC will endeavour at all times and in any way possible to:

- Respect and promote the rights, wishes and feelings of children.
- Recruit, train and supervise staff to adopt best practice in order to safeguard and protect young people from abuse and themselves from false allegations.
- Respond to complaints, concerns and allegations and implement the appropriate disciplinary and appeals procedures.

APPENDICES 2

DISCLOSURE AND BARRING SERVICE CODE OF PRACTICE

INTRODUCTION

The Disclosure and Barring Service (DBS) was established in December 2012 under Part V of the Protection of Freedoms Act (POFA)¹ to undertake disclosure and barring functions. There are specific legal requirements around these checks. Disclosure functions are set out in Part V of the Police Act 1997,² which requires Registered Bodies to adhere to this Code of Practice.

WHO DOES THIS CODE APPLY TO?

The Code of Practice applies to all Registered Bodies with the Disclosure and Barring Service (DBS) under section 120 of the Police Act 1997 (Registered Bodies) and recipients of Update Service information under section 116A of the Police Act 1997. This includes those Registered Bodies that provide an umbrella function to non-registered organisations. The Code refers to any information exchanged between DBS and the Registered Body.

The Code of Practice does not apply to other third parties. The DBS will seek to ensure compliance with the Code through the full range of DBS assurance management processes.

All applicants for a DBS check should be made aware of this Code of Practice and provided with a copy on request.

DISCLOSURE OFFENCES: SECTIONS 123 AND 124 OF THE POLICE ACT 1997³

Although certificates are now provided directly to the applicant, registered bodies will receive personal information related to applications and, where registered bodies are also employers, voluntary sector organisations or licensing authorities, will receive disclosure information when certificates are provided to them by their employees or applicants for posts, including volunteers.

Recipients of disclosure information, through electronic means or via the applicant's copy of the disclosure, must note that it is an offence to disclose information contained within a DBS Certificate to any person who is not a member, officer or employee of the Registered Body or their client, unless a relevant legal exception applies. Furthermore, it is also an offence to:

Disclose information to any member, officer or employee where it is not related to that employee's duties

Knowingly make a false statement for the purpose of obtaining, or enabling another person to obtain, a Certificate

Revised Code of Practice for Disclosure and Barring Service Registered Persons Registered Bodies and those in receipt of Update Service information believed to have committed an offence will be liable to prosecution, suspension or de-registration.

WHAT HAPPENS IF THE CODE IS BREACHED?

The Police Act 1997 (Criminal Records) (Registration) Regulations 2006⁴ sets out Conditions of Registration. Regulation 7(h) is for compliance with the Code of Practice issued under section 122 of the Act.

Failure to comply with Conditions of Registration can result in the suspension or cancellation of registration. This follows a set legislative process with clear timescales.

Failure to comply with requirements set out in the Data Protection Act may also result in enforcement action from the Information Commissioner's Office (ICO).

APENDICES 3**THE CODE OF PRACTICE – THE PHOTOGRAPHERS**

The aim of each photographer should be to help celebrate and promote football. When taking an image they should be asked to:

- Focus on the activity rather than the individual child
- Include groups of children rather than individuals if possible
- Ensure all those featured are appropriately dressed (a minimum of vest or shirt and shorts)
- Represent the broad range of youngsters participating in football – boys and girls, disabled children, members of minority ethnic communities.

APENDICES 4:

WHAT TO DO – RESPONDING TO A CONCERN/REPORT/ALLEGATION

