

**West Bromwich Albion Football Club  
Safeguarding Children  
Policy & Procedures**



---

**This document has previously been seen by Sandwell Children's Trust and Mick Spellman independent advisor.**

**This Policy has been prepared in consideration of the club Equality, Diversity and inclusion policy and has been impact assessed. The club constantly review our policies and if you are detrimentally affected, please contact [Chris.elliott@wbafc.co.uk](mailto:Chris.elliott@wbafc.co.uk). These documents are prepared in accordance with the EFL Safeguarding Standards. They have been examined by Barnardos Children Charity 2022**

**There is separate policy in relation to adults at risk (AAR) which shall be reviewed separately.**

**West Bromwich Albion Foundation incorporate the Policies of the Football Club.**

**Documents circulated to Senior Safeguarding Team for Approval March 13<sup>th</sup> 2022**

Reviewed by Chris Elliott - Head of Safeguarding February 2022  
Reviewed by Barney Ellis - Senior Legal Counsel April 2022  
Reviewed by Mark Miles - Managing Director (Non-Football) April 2022  
Reviewed by Mick Spellman independent advisor November 2021

Version 19. 5	
Reviewed March 2022 SSMT	Amended by
Amendment re Non-Collection 10.12.2018, amendment 06.05.2019 Prevent Amendment 01/07/2019 Personnel Amendment 22/07/2019 re Scouts and Private Academy functions Amendment KCSIE Sept 2021 Amendment 20/11/2019 Working Together In conjunction with KCSIE June 2020 Notes also considered. Consideration of Covid-19 Risk. Please see Separate Guide.) (June 2020) (Aug 21)	Chris Elliott Head of safeguarding.  <i>C.Elliott</i>

**Metadata**

Policy Owner Chris Elliott	Human Resources
Policy Author Chris Elliott	Safeguarding
Effective date April 2022	April 2022
Review date	January 2023

---

## Table of Contents

---

<b>Section 1</b>	1.1	Approval of Document
	1.2	Foreword
	1.3	A Statement of the West Bromwich Albion Football Club Safeguarding Policy & Procedures
	1.4	“The Children Act 1989
	1.5	Recruitment of Staff to a Position of Trust
	1.6	KCSIE 19 and 20 (Keeping Children Safe in Education
<b>Section 2</b>	2.1	Recognising Abuse
	2.2	Definitions of Abuse
<b>Section 3</b>	3.1	West Bromwich Albion Football Club Designated Persons for Safeguarding
	3.2	West Bromwich Albion Football Club Safeguarding Team
<b>Section 4</b>	4.1	Departmental Guidelines
	4.2	Duty of Care
	4.3	Academy and The Albion Foundation staff
	4.4	Suspensions or Allegations of Abuse
	4.5	One to One Situations
	4.6	Academy Parents/Carers
	4.7	Academy Physiotherapy Department
	4.8	Match day Operations including Mascots
	4.9	Child Sexual Exploitation (CSE)
	4.10	PREVENT – Preventing Radicalisation / Tackling Extremism
<b>Section 5</b>	5.1	Guidelines for UK Residential Courses & Tours
	5.2	Dealing with a Homesick Student
<b>Section 6</b>	6.1	Best Practice in the use of Images of Young People
	6.2	Employment of Young People within the UK
	6.3	Overseas Entertainment/Employment Licence
<b>Section 7</b>	7.1	Emergency Situations – Non-Collection of a Student
	7.2	Student Refusing to return home
	7.3	Lost Missing Child
<b>Section 8</b>	8.1	What Happens when a Referral is made
	8.2	Referral to the Designated Person
	8.3	West Bromwich Albion Referral Sheet

- 8.4 Good Practice in Safeguarding
- 8.5 Reporting a concern about staff

- Section 9**
  - 9.1 **West Bromwich Albion Football Club Safeguarding Policy and Procedures Summary**
  - 9.2 West Bromwich Albion Football Club Anti-Bullying Policy
  - 9.3 West Bromwich Albion Football Club Additional Needs Policy
- Section 10**
  - 10.1 References

---

## Section 1

---

- 1.1 Approval of Document**
- 1.2 Foreword**
- 1.3 A Statement of West Bromwich Albion Football Club Safeguarding Policy and Procedures**
- 1.4 “The Children Act 1989”**
- 1.5 Recruitment of Staff to a Position of Trust**
- 1.6 This policy has been written with consideration to KCSIE 2021**
- 1.7 Security of Data and information**

**West Bromwich Albion Football Club**  
**Safeguarding Policy & Procedures (Approved version 1.2)**

This Document has been prepared in accordance with legislative requirements and the rules of the Premier League, EFL and Football Association.

This document has been prepared in consultation with Sandwell Children's Trust.

The document has been shared with the Senior safeguarding team at West Bromwich Albion Football Club

Barney Ellis Legal Counsel

Mark Miles Operations Director

Ron Gourlay CEO

Richard Stevens Head of Academy

Rob Lake The Albion Foundation (TAF)

In addition the following from the Albion Foundation (TAF) have been involved in its construction.

Andrew Wheeler and Paul Glover, Safeguarding (The Albion Foundation)

The Policy shall help to embed the Safeguarding of Children and Adults at risk across the football club.

The Policy has been prepared in consideration of the Safeguarding Action and implementation plan of the Football Club April 2021/22 Season

West Bromwich Albion Football Club (the club) recognises that children are the future and that their wellbeing is an important and shared responsibility.

The Club is committed to providing a protected environment for all children who are involved with the Club, whether through contact with the Academy or The Albion Foundation or by participating in one of the many activities, or through attending on a matchday.

The Club's Safeguarding Policy is fundamentally designed to assist and support everyone at the Club who comes into contact with children, whilst providing a safe, friendly, happy and vibrant environment which can be enjoyed by all the children who visit us.

In this Policy, reference to West Bromwich Albion Football Club or the club includes any club or company which is a subsidiary or associated club or company including, for the avoidance of doubt, The Albion Foundation and any other subsidiary or associated club.

A separate policy for adults at risk has been produced. The Club also recognises that all vulnerable groups including adults at risk shall be free from harm and have the right to protection from abuse and exploitation.

All policies shall be reviewed annually and in the event of any significant incident/occurrence or legislative change.

### 1.3

## **A Statement of West Bromwich Albion Football Club Safeguarding Policy & Procedures**

---

The West Bromwich Albion Football Club Safeguarding Policy and Procedures have been written in accordance with the “Children Act 1989 and 2004”, “Working Together to Safeguard Children” (2020), and the requirements of Sandwell children’s trust.

It has been prepared with consideration to ‘Keeping Children Safe in Education 2020 (June) commencing Sept 2020 and 2021, and will ensure compliance with the September 2021 amendments.

Amendments in relation to Barring by association in education as per KCSIE 21 are noted.

#### **Summary of key Changes to KCSIE 2021**

Some of the key changes include:

- A new paragraph included about Coronavirus plus supporting guidance.
- New responsibilities have been granted to the role of DSL
- More guidance provided to allow schools to ensure that any allegations that are made against a temporary tutor etc. are handled accordingly
- Online learning and ensuring that safety measures are put in place to keep children safe whilst working from home online.
- More emphasis made on protecting children’s mental welfare as part of the safeguarding.

This Policy is a guidance for all staff and is provided to ensure the security and protection of all children and young persons who we engage with.

---

### 1.4 The Children Act, 1989 and 2004

---

- 1.4.1 All those working with children, and in particular those involved with Safeguarding, should be aware of the Children Act 1989 and 2004 and Working Together Principles.

The following principles have been highlighted as being the most important for the purpose of these procedures

In this document, a child is defined as anyone who has not yet reached their 18th birthday. 'Children' therefore means 'children and young people' throughout. (Working Together 2018)

The Care Act 2014 defines an adult at risk as: Someone over the age of 18 who has a need for care and support. Someone who is experiencing or is at risk of neglect or abuse

- a) The welfare of the child is Paramount.
  
- b) The wishes and feelings of the child must always be taken into consideration. We must all strive to hear the voice of the child and note and record their views. Children can and should be part of the process in achieving successful outcomes
  
- c) Race, culture, language, needs and religion must always be taken into account when working with children and families.
  
- d) Parents and guardians who have parental responsibility must be involved in all decisions about the child.
  
- e) If the parents are unmarried when the child is born, the mother will have parental responsibility, but the father does not have parental responsibility. To gain parental responsibility the father must take steps to 'acquire' it, either through an agreement with the mother or by a court order.

In the case of children born after December 2003, fathers, although not married to the mother, but whose name appears on the birth certificate shall have parental responsibility.



---

## 1.4 The Children Act, 1989 and 2004

---

1.4.2 All those working with children, and in particular those involved with Safeguarding, should be aware of the Children Act 1989 and 2004 and Working Together Principles.

The following principles have been highlighted as being the most important for the purpose of these procedures

**In this document, a child is defined as anyone who has not yet reached their 18th birthday. 'Children' therefore means 'children and young people' throughout. (Working Together 2020)**

**The Care Act 2014 defines an adult at risk as: Someone over the age of 18 who has a need for care and support. Someone who is experiencing or is at risk of neglect or abuse.**

- a) The welfare of the child is Paramount.
  
- c) The wishes and feelings of the child must always be taken into consideration. We must all strive to hear the voice of the child and note and record their views. Children can and should be part of the process in achieving successful outcomes
  
- d) Race, culture, language, needs and religion must always be taken into account when working with children and families.
  
- e) Parents and guardians who have parental responsibility must be involved in all decisions about the child.
  
- f) If the parents are unmarried when the child is born, the mother will have parental responsibility, but the father does not have parental responsibility. To gain parental responsibility the father must take steps to 'acquire' it, either through an agreement with the mother or by a court order.

In the case of children born after December 2003, fathers, although not married to the mother, but whose name appears on the birth certificate shall have parental responsibility.

---

## 1.5 Recruitment of Staff to a Position of Trust

---

### 1.5.1 General

A person who is regularly involved in caring for, training, supervising or being in sole charge of a child or young person and in the course of his involvement has unsupervised contact, whether face to face or by any other means, is deemed, in law, to be in a 'Position of Trust'.

No individual will be recruited on a temporary or permanent basis to a position of trust without satisfactory clearances from the Disclosure and Barring Service (DBS) for safeguarding purposes and the completed examination of suitable references

### 1.5.2 Disclosure and Barring Service (DBS)

West Bromwich Albion Football Club is a registered body of the DBS and uses the Service to assess the suitability of an applicant to work with children and young people.

**No applicant who is conditionally offered a position of trust with West Bromwich Albion Football Club shall commence employment with the Company before satisfactory clearance has been received.**

Any relevant content on a DBS from a candidate shall be viewed and assessed by the 'Content Panel' before any appointment.

All staff including trustees in a position of trust will be required to undergo regular Enhanced Disclosure Clearances, normally every three years, as a condition of their contract of employment. Should the duties of a worker in a position of trust change, or the worker move to another position of trust within the Company, they may be required to undergo further disclosure clearance depending on the nature of the additional duties/new position.

A single central record for the purposes of safer recruitment is maintained by the Club. The current system is held on the CPS system of both the PL and EFL. Any incident or concern regarding staff shall be recorded as soon as is possible upon the 'My Concern' system.

Any details recorded upon 'My Concern' shall be available upon request via 'subject access' to the Club. All data and information shall be treated in accordance with GDPR.

### Safer Recruitment Policy 2022

All new staff will undertake a safeguarding induction either in person or online. Safeguarding will form part of the interview process for relevant posts.

The process will include self-certification and right to work procedures. An online

safeguarding training module provided by the PL, EFL, The FA or other providers shall be completed.

All staff shall complete the self-declaration process and note the conditions under data protection GDPR and the use of data.

Third party contractors such as cleaners, agency decorators, maintenance etc shall be assessed for suitability to be on site through their own personnel systems. A service level agreement shall be established with the third party that outlines the Club commitment to safeguarding, the Club safeguarding statement and how to report concerns.

These contactors are not part of the children's work force. The department where the contractors are working shall be notified and they shall seek to ensure that any risk is minimised. The contractors shall be issued with Club I.D. passes whilst on site and shall sign in and out of the premises.

Where a contactor or non organisation staff are engaged on a regular basis or extended period, consideration should be given for the individual to apply for an enhanced Disclosure and Barring Service check. This however shall not be the only means of validation for the individual.

### 1.5.3 References

At least two references will be required. One should normally be from the applicant's current or most recent employer. If a reference raises any concern the matter should be referred to Chris Elliott, Club Head of Safeguarding or Head of HR Sam Foxall - e mail [sam.foxall@wbafc.co.uk](mailto:sam.foxall@wbafc.co.uk)

Chris Elliott can be contacted by email at [chris.elliott@wbafc.co.uk](mailto:chris.elliott@wbafc.co.uk) or [safeguarding@wbafc.co.uk](mailto:safeguarding@wbafc.co.uk)

All staff shall receive a safeguarding induction to their relevant department.

All staff working or likely to work with Children under 8 years shall be liable to "Disqualification by Association" recruitment process. This requirement will comply with the Local Authority policies for schools as set out by Ofsted.

KCSIE 18 Amended. Updated June 2020. Comes into force on 1<sup>st</sup> September 2020 and shall apply to the academy and foundation sites

1.5.4 All data gathered and retained in relation to safeguarding shall be stored securely and retained for the purpose of its collection and retained for no longer than is required. All data shall be subject to General Data Protection Regulations. A separate GDPR Policy can be viewed through the Club portal system.

1.5.5 All safeguarding matters/referrals/incidents shall be recorded on the single central record under the Child single central record for incidents within 'My Concern'

---

## Section 2

---

**2.1**      **Recognising Abuse**

**2.2**      **Definitions of Abuse**

---

## **2.1 Recognising Abuse**

---

This section should be read with caution. It is not a comprehensive guide to assessing child abuse and must be seen in the context of the West Bromwich Albion Safeguarding Awareness training.

- 2.1.1 The presence of one or other of these features will not necessarily mean that a child or young person has been abused and should not be seen in isolation, but may indicate that careful investigation (by an appropriate person) is needed
- 2.1.2 'Child Abuse' may be described as harm to a child or young person, or the failure by a person with responsibility for a child or young person to provide reasonable care or a combination of both.
- 2.1.3 Abuse may take the form of physical injury, sexual or emotional abuse, or neglect. This will include bullying. This may take place in the real world or through social media. Harm to a child or young person may be caused by a child's (or young person's) parents or carer, a relative, a stranger or someone known to the child or young person, or even by another child or young person. Consideration should also be given to incidents which may be Peer on Peer pressure

---

## 2.2 Definitions of Abuse

---

### 2.2.1 Physical Injury

Actual or likely physical injury to a child or young person or failing to prevent physical injury or suffering to a child or young person.

Physical abuse may involve hitting, shaking, throwing, poisoning, and burning, scalding, drowning, suffocating or otherwise causing physical harm to a child or young person.

Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill-health to a child or young person they are looking after (fabricated or induced illness).

It should be noted that only a clinical medical officer or a consultant paediatrician should diagnose when an injury is non-accidental. It is not the responsibility of West Bromwich Albion staff to determine the cause of an injury.

### 2.2.2 Neglect and 'Failure to Thrive'

Neglect is the persistent failure to meet a child or young person's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur in pregnancy as a result of substance misuse.

It may involve a parent or carer failing to provide adequate food, shelter, and clothing, failing to protect a child or young person from physical harm or danger, or the failure to ensure access to the appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to a child or young person's basic emotional needs.

### 2.2.3 Sexual Abuse

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 or not 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 or other social media). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

The Club shall support all victims of abuse and where necessary ensure they are signposted to all relevant agencies.

The Club will support all victims of female genital mutilation (FGM) and will promote awareness and understanding to all staff.

#### 2.2.4 Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children 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 the 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, though it may occur alone.

#### 2.2.5 Domestic Abuse

Domestic Abuse is an important indication of risk of harm to children.

Children may suffer directly and indirectly if they live in households where there is domestic abuse.

Domestic abuse is likely to have a damaging effect on the health and development of children. A child in a situation of Domestic abuse should be regarded as a "Child in Need". (See Section 1.3 "Procedures to follow if Abuse is suspected").

#### Honour based violence

Consideration should be considered when dealing with abuse within families. The impact upon all children within the household and the risk to them must be assessed accordingly

Bullying is a serious and harmful form of abuse whether it is by another child or staff member. This is dealt with more fully in a separate section and is subject to a standalone anti bullying policy

Online or abuse may be committed through the use of electronic devices and phones etc.

The Club shall use electronic filtering on Club devices to monitor and report such abuses. The use of Club mobile phones and other devices is regulated and can be subject to seizure and examination if improper use is suspected.



### Non-Recent Abuse

Recent years have seen a very large increase in the reporting of 'historical' child abuse. To the survivors of this abuse it is not historical, and it may be something which they still suffer from and have carried with them for a lifetime. West Bromwich Albion FC would seek to support any person coming forward to report any such matter. The survivors can be directed to the same agencies as for recent abuse cases and can also be sign posted to the Football Association, the Save Association and to the Head of Safeguarding at this football Club. The policy takes into account the Sheldon report 2021.

### **Sexting Youth Produced Sexual Imagery**

#### **Please see the separate YPSI Policy**

The take note of the increased use of devices worldwide in order to exchange sexual images of children. Whether consensual or by use of coercion and abuse, staff must consider the welfare of young persons and seek guidance from the Head of, player care manager, champion, or academy designated safeguarding officer immediately.

Training and awareness of this sensitive issue shall form part of staff inductions, player, and parent inductions and across all aspects of the Club.

- 2.2.6 Failure by any employee or volunteer to act upon, report or refer any concerns to the Safeguarding Manager, other statutory agency, or member of management at WBA FC may be regarded as gross misconduct.

---

### **Section 3**

---

**3.1 West Bromwich Albion Football Club Designated Persons for Safeguarding**

**3.2 West Bromwich Albion Football Club Safeguarding Staff**

---

### 3.1 West Bromwich Albion Designated Persons for Safeguarding

---

WBA FC will appoint “Designated Persons for Safeguarding” for each appropriate area of Club Activity. See Section 3.1.3. - Contact Numbers for Designated Persons for Safeguarding at West Bromwich Albion. These may be DSO or Safeguarding Champions

3.1.1 The Safeguarding Officers and champion shall receive terms of reference in relation to their role. The DSOs be responsible for designated activities and / or areas of work and shall report to the Head of Safeguarding Chris Elliott. These activities shall include

- They shall concern themselves with all aspects of Safeguarding within their area.
- ensuring that all issues of Safeguarding are dealt with in compliance with the WBA FC Safeguarding Policy and Procedures, and with the requirements of Sandwell, Birmingham, and Walsall Children’s trusts.
- WBA FC shall ensure that all staff appointed have been checked by the (DBS) and are considered being suitable and safe adults to work with children (see Section 1.5, “Recruitment of Staff to a Position of Trust”). Self declaration forms must be completed by staff before appointment who are considered to be working or volunteering in designated safeguarding role or any regulated activity.
- The Head of Safeguarding shall be responsible for the management and co-ordination of Safeguarding issues. They will establish and maintain a system of Safeguarding Records, including notes of all concerns referred by staff and will be responsible for the security and confidentiality of this information. This SCR shall be used to produce reports which indicate concerns and trends across the organisation. They shall be retained and used in accordance with GDPR. Policy shall be established that informs those we engage with that data and information shall be created and may be shared with others. They shall be informed of the right to access to the data vis subject access.
- ensuring that all staff are familiar with the West Bromwich Albion Football Club Safeguarding Policy and Procedures.
- ensuring that all staff receives initial Safeguarding Awareness Training.
- providing support to any member of staff in respect of any Safeguarding issue or concern
- seeking advice on Safeguarding concerns or allegations disclosed
- after consultation with the Head of Safeguarding, referring Safeguarding Issues or concerns to the Local Authority/Police for an investigation to be initiated

- seeking the advice of the Head of Safeguarding to ensure that, in the event of an allegation being made against a member of staff, the West Bromwich Albion Football Club Safeguarding Procedures are followed. It shall be the case that all staff are informed of the course of investigations into allegations and the possible outcome.
- being responsible for contacting the parents of a child/children involved in any Safeguarding or welfare issues if appropriate (i.e. not placing the child at further risk).

### 3.1.2

#### Contact Numbers for Designated Persons for Safeguarding at West Bromwich Albion

<b>West Bromwich Albion FC – Strategic Safeguarding Lead</b>		
Mark Miles	Mark.miles@wbafc.co.uk	

<b>West Bromwich Albion FC – Head of Safeguarding</b>		
Chris Elliott	Chris.Elliott@wbafc.co.uk	Mobile: 07976660953

<b>West Bromwich Albion FC – Academy Player care</b>		
Simon Crockett	Head of Player Care	Simon.crockett@wbafc.co.uk

<b>West Bromwich Albion FC – Designated Safeguarding Officers (DSO)</b>		
Andrew Wheeler (The Albion Foundation)	<a href="mailto:Andrew.wheeler@albionfoundation.co.uk">Andrew.wheeler@albionfoundation.co.uk</a>	
WBA FC Head of academy	<a href="mailto:Chris.elliott@wbafc.co.uk">Chris.elliott@wbafc.co.uk</a>	07976 660 953
Ian Skidmore (WBA FC Communications)	<a href="mailto:ian.skidmore@wbafc.co.uk">ian.skidmore@wbafc.co.uk</a>	
Chris Harris (WBA FC Match Day Operations)	<a href="mailto:Chris.harris@wbafc.co.uk">Chris.harris@wbafc.co.uk</a>	
Simon Crockett Academy DSO	<a href="mailto:Simon.crockett@wbafc.co.uk">Simon.crockett@wbafc.co.uk</a>	
Cindy Joyce (WBA FC Match Day Mascots)	<a href="mailto:Cindy.joyce@wbafc.co.uk">Cindy.joyce@wbafc.co.uk</a>	
Teresa Howells Retail	<a href="mailto:Teresa.howells@wbafc.co.uk">Teresa.howells@wbafc.co.uk</a>	
(WBA FC) – Academy Education	<a href="mailto:Nick.williams@wbafc.co.uk">Nick.williams@wbafc.co.uk</a>	
Paul Glover Albion Foundation Adults at risk	<a href="mailto:Paul.glover@albionfoundation.co.uk">Paul.glover@albionfoundation.co.uk</a>	
Sam Foxall HR Safer Recruitment	<a href="mailto:Sam.foxall@wbafc.co.uk">Sam.foxall@wbafc.co.uk</a>	

In 2022 further safeguarding structures have been added to the provision at WBA FC.

A senior safeguarding management team (SSMT) has been formed and will help drive safeguarding across the organisation.

A Safeguarding Operating Group was formed in 2021 and directs policy and implements plans across the organisation. The SOG reports directly to the SSMT

A Safeguarding 'Champions' Team has been formed in February 2022 which assists in the delivery of the safeguarding plan and ensures that our safeguarding Environment and Culture is promoted and encouraged.

All three groups are able to receive and record concerns.

Non- Executive member

Michael Spellman. [mspellman@blueyonder.co.uk](mailto:mspellman@blueyonder.co.uk)

The following are other useful contact numbers:

Walsall Children's Services (Social Care), Initial Response Service 01922 658170

Education in Children Services – Advice & Referrals	-	0845 351 0131
FA/NSPCC Helpline	-	0808 800 5000
Asian Helpline	-	0800 096 7719
Sandwell Hospital	-	0121 553 1831
West Bromwich Police Station	-	101

Disclosure & Barring Service - 0870 909 0811

Sandwell Children's Trust  
Local Authority Designated Officer. (LADO) - 0121 569 4770

Walsall Local Authority Designated  
Officer. (LADO)  
Michelle Pinnock-Ouma  
lado@walsall.gov.uk - 01922 646640  
(For allegations against staff)

Save Association (Survivors of historical abuse in football)  
[WWW.saveassociation.com](http://WWW.saveassociation.com)

NSPCC. Non-recent abuse Support for adults abused as children



---

### 3.2 West Bromwich Albion FC Safeguarding Staff

---

West Bromwich Albion Football Club has qualified and experienced Safeguarding Officers who are responsible for:

- Ensuring that the West Bromwich Albion Football Club Safeguarding Policy and Procedures are updated and in line with current legislation and regulations.

All staff whether at the Albion Foundation or at the 'Football Club' shall seek to ensure that in every area of partnership working there shall be a commitment to influence partners in the area of safeguarding. Service level agreements shall be established for partnership working which outlines the Club's safeguarding requirements and our commitment. They shall also include a commitment from the partners in the form of service level agreements. All safeguarding service level agreements shall be Submitted to the head of safeguarding, Chris Elliott.

- Overseeing of all aspects of Safeguarding at West Bromwich Albion Football Club.
- The Head of Safeguarding will have responsibility for the implementation of Safeguarding training at West Bromwich Albion Football Club; this training will consist of, in house training and partnership training with Walsall and Sandwell Safeguarding Children Board
- The appointment of "Safeguarding Officers" in all sectors of West Bromwich Albion Football Club to which the Safeguarding Policy applies.
- To ensure the Implementation of West Bromwich Albion Football Club's Safeguarding Policy and Procedures, acting as a counter signatory for the Disclosure and Barring Service (DBS) in conjunction with the Human Resources Department and those other sections of West Bromwich Albion.
- Acting liaison officer to Walsall and Sandwell Children trusts
- Liaison with the F.A. Premier League, English Football League (EFL) the Football Association and other appropriate agencies in matters of Safeguarding

### 3.2.2 The Independent Advisor

West Bromwich Albion FC will appoint an Independent Advisor who will be an independent Senior Social Worker or safeguarding professional, experienced in conducting investigations into abuse involving professionals. He/she will advise West Bromwich Albion Football Club of the appropriate course of action in respect of ensuring the safeguarding of all children and young people we engage with or who work for our Club. The suitable advisor shall be selected by the Safeguarding management team.

---

## Section 4

---

- 4.1 Departmental Guidelines**
- 4.2 Duty of Care**
- 4.3 WBA FC Academy and The Albion Foundation Staff**
- 4.4 Suspicions or Allegations of Abuse**
- 4.5 One to One Situations**
- 4.6 Academy Parents/Carers**
- 4.7 Academy Physiotherapy Department**
  - 4.7.1 Academy private Events**
  - 4.7.2. Academy Scouts**
- 4.8 Matchday Operations**

---

## **Departmental Good Practice**

### **Safeguarding Guidelines**

---

These Guidelines, specific to each Department, are presented to meet the particular needs of individual departments. They do not stand alone and should be read in conjunction with West Bromwich Albion Football Club's "Safeguarding Policy & Procedures", West Bromwich Albion Whistle blowing Policy, Equal opportunities Policy and modern-day slavery policy. The policies can be accessed via the Club website. [Wbafc.co.uk](http://Wbafc.co.uk) under Club and policies

In compliance with West Bromwich Albion Football Club's terms and conditions of employment, all staff working with Children and Young people must undergo an enhanced DBS check as part of the process of ensuring they are appropriate and safe adults to work with children. These Guidelines must be followed in the appointment of any prospective member of staff.

---

## 4.2 A 'Duty of Care'

---

All West Bromwich Albion FC staff and volunteers are advised:

Because of your role and responsibilities at West Bromwich Albion Football Club, you have a 'Duty of Care' towards all the children and young people you come into contact with during the course of your employment or engagement. The Club will therefore carry out safe recruitment practices for those roles working with children.

- Sport provides easy access for someone who wants to harm children. 'Positions of Trust', working with children and young people, will only be offered subject to an enhanced DBS check and two satisfactory references, one of which must be from the most recent previous employer.
- The close proximity of staff in an intense and competitive atmosphere places child and adult in vulnerable situations.
- Relationships between staff and young people must, at all times, be professional.
- Sport is uniquely placed to contribute towards safeguarding the welfare of children and young people.

### 4.2.1 Guidelines

You always have a legal and moral duty to report a Safeguarding concern.

- This is not always easy - but remember by reporting you will enable people with more experience and expertise to make the judgement as to whether or not a concern is abuse.
- You may fear the consequences of reporting a concern.
- You may feel a loyalty to friends and colleagues, but this is misplaced if a young person's welfare is at risk.
- You may want to pretend it's not happening, that you are overreacting, or that it is simply not possible or believable.

#### **Report it! The welfare of the child is paramount.**

West Bromwich Albion Football Club and The F.A. will support anyone who, in good faith, reports concerns about a child's welfare. Please see the Club's 'Whistle Blowing Policy'. This can be accessed via [wba.co.uk](http://wba.co.uk) Club and policies.

West Bromwich Albion FC use an electronic recording system to record any concerns. This data is secure and is compliant with GDPR.

Staff are able to report on the My Concern system at any time,

#### 4.2.2. Texting/Messaging/Apps and Social Networking

Communication between students, children, young people, and coaches (and other West Bromwich Albion Football Club Staff) must be through the departmental office, specific project based social media (e.g. Kicks Facebook page) or on mobile phones provided through WBA FC or The Albion Foundation.

Under no circumstances should there be any texting/or communication of messages between coaches/staff personal phones and students, children, or young people. This includes adding young people as 'friends' on personal social networking sites, such as Facebook. Instagram, snapchat etc

The use of 'whats app groups' to contact young people and staff must only be done so via Club devices. Chris Elliott or the academy safeguarding officer must be included in the groups. Whats App should not be used by persons Under 16 years of age. Children at the academy should be discouraged from posting on Tik Tok and other social media applications.

There should be no phones or other image capturing devices in any changing room either at training or matchday. West Bromwich Albion are developing an IT usage policy for use of Club electronic devices, and this will be published in due course. A separate social media use policy for staff is also under development. Inappropriate use of devices and social media may result employment and discipline sanctions being undertaken which can include dismissal.

---

### **4.3 Academy and Foundation Coaches / Staff**

---

#### 4.3.1 General

West Bromwich Albion Football Club is committed to ensuring that all coaching staff has the ability and confidence to work supportively and positively. In this respect, Coaches should ensure that:

- ✓ They respect the rights, dignity and worth of each student or player;
- ✓ They develop an appropriate working relationship with each student or player. Over familiarity between coach and student or player may be misunderstood, therefore clear boundaries must be established from the beginning;
- ✓ They exert no undue influences.
- ✓ They encourage and guide students and players to accept responsibilities.

- ✓ They ensure that all activities are appropriate; Staff must not participate in games or training involving children. Staff can demonstrate activities or skills without being involved in the game itself.
  
- ✓ They clarify with students and players exactly what is expected of them and what they are entitled to expect from their coach.
- ✓ All imagery used for coaching purposes shall be done so in accordance with the FA imagery policy and Premier League guidelines. All imagery shall be stored securely and shall only be distributed by approved means. Huddle, PMA. Consent must always be obtained from all participants. This shall include referees who for a lot of academy games will be children themselves. (All records shall be kept in accordance with GDPR regulations.)
  
- ✓ They co-operate fully with other specialists.
  
- ✓ They ensure that all students and players are aware of the procedures that are in place i.e., when injured reporting to the physiotherapist before training. Failure to observe this may result in the student or player being withdrawn from playing. Coaches must not encourage students and players to train or play with injuries.
  
- ✓ They consistently display high standards of behaviour and appearance.

#### Codes of Conduct for players and Parents

Academy participants and parents shall comply with the code of conduct set out in the Academy Players handbook. This shall be issued and updated each season/year.

Parents are encouraged to take an active role in the footballing development of their child but must allow the staff to carry out their roles without interference.

No academy activity should be the subject of social media postings by staff or participants.

Compliance with the Club social media policy, the guidance from the FA on the use of imagery shall be ensured at all times.

4.3.2 Coaches Working with Children with Disabilities: This section should be considered together with the Adults at Risk Policy of West Bromwich Albion

As part of West Bromwich Albion Football Club's Equalities, Inclusion and Diversity Policy. West Bromwich Albion FC will make every effort to ensure that students or players with disabilities receive treatment that is fair, equitable and consistent with their skills and abilities. In this respect, coaches should ensure that:

- ✓ They respect the rights, dignity and worth of each student or player regardless of disability.
- ✓ They are aware that instructions may need to be repeated or rephrased, particularly in the case of younger players.
- ✓ They develop an appropriate working relationship with each student or player by ensuring that good lines of communication are established with the disabled person and/or parent/carer.
- ✓ They exert no undue influence in encouraging participation.
- ✓ They support and guide students and players to their full potential.
- ✓ They establish that all activities are appropriate to the individual's abilities. Communicate with the disabled student or player and/or parent/carer to establish capabilities and offer support as necessary, to facilitate inclusion.
- ✓ They are aware of medical needs by communication with the disabled student or player and/or parent/carer.
- ✓ They are aware of physical/mental capabilities by communication with the disabled student or player and/or parent/carer, but don't make assumptions about the limitation of a student or player.
- ✓ They consistently display high standards of behaviour and appearance.
- ✓ They always use common sense judgement when planning sessions.



---

#### 4.4 Suspicions or Allegations of Abuse

---

4.4.1 **Chris Elliott** is the Head of Safeguarding to whom any concerns, allegations or referrals must be referred to. He can be contacted by email or mobile at anytime. If not available details of others can be found on page 21 and 22

**Simon Crockett** is the Deputy Head of Safeguarding

**Safeguarding Officers** contact details can be found on pages 21 and 22

All suspicions or allegations of abuse or of inappropriate behaviour must be reported as a matter of urgency.

It must be remembered that all matters relating to Safeguarding are strictly confidential. Information should be discussed only with the appropriate member of staff where necessary.

---

## 4.5 One to One Situations

---

One to one situation may be necessary in a learning environment especially if they are to avoid damaging the self-esteem of a student or young player.

- Wherever possible it is advisable to draw the student or player to one side so that, although private, the discussion may take place in full view of others. This is for everyone's protection. 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 also be present, or doors left open. Whenever possible parents should be present at such meetings. There should be nothing that is said to a young player that parents cannot hear.
  
- Feedback to players should always be constructive. Negative feedback can destroy young person's self-esteem.

---

## 4.6 Academy Parents/Carers

---

### 4.6.1 Changes of Address/Telephone numbers

Parents/carers/guardians are requested to inform the Academy Recruitment Officer and their child's coach of any changes of addresses/telephone numbers as a matter of urgency. Staff must ensure that emergency numbers are updated regularly. It is imperative that there are more emergency numbers than just the parents/carers/guardians. There must be alternative numbers for the occasion when both parents are non-contactable. (They may be in the same vehicle as an example)

This shall be communicated at the commencement of each season through the player and parents' handbook.

### 4.6.2 Emergency contact numbers

The Academy Office requires more than two up to date emergency contact numbers.

### 4.6.3 Away Matches/Activities

Parents/carers are expected to read information sheets to check departure and return times for away matches and other activities. It is essential that boys are dropped off at the required time. Parents arriving early are to be responsible for the safeguarding of their child until the coach takes over at the appointed time.

Parents/carers should make sure that they hand over their child personally. They can then check that there are no changes to the existing arrangements.

There may be unavoidable delays in returning from away matches. If this occurs staff will endeavour to provide up dated information of arrival times. It is the responsibility of parents/carers to arrive at the collection point on time. Parents/carers are requested to attend promptly.

### 4.6.4 Collection of Children

The team coach and the Academy Office must be informed in writing of any change to the normal arrangements for the collection of a child.

Staff are instructed not to release a child to someone other than the usual 'collector' unless they have advance notice in writing of the change. A Proforma will be supplied for such emergencies. Copies of the Proforma will be available from the Club or member of staff. The parent of the child must be consulted and informed before any alternative arrangement is made. Care must be taken when at this critical handover time. Maintaining a register is advisable and good practice at this time.

The Academy does not encourage the arrangements involving the use of unaccompanied taxi drivers to collect children.

Approved taxi companies' details are held at the academy building. These companies are authorised by Sandwell Licencing Authority to act as transport providers to Sandwell education. The drivers are subject to Disclosure and barring service checks. (DBS) This is not a recommendation of these companies, and any use is entirely at the parent/guardian's risk

All journeys conducted by WBA FC staff shall be with full parental consent and be in accordance with the Club transport policy.

#### 4.6.5 Trips abroad and at home. Pre-Tour Meetings

It is vital that parents/carers attend all pre-tour meetings so that they are properly briefed about tour arrangements. The Academy is not prepared to take children on tour whose parents/carers have not attended these essential meetings. In exceptional circumstances, with the agreement of the Academy, an appropriate representative may be appointed to attend on behalf of the parent/carer.

Post tour risk assessment and reports shall be completed, disseminated, and retained by the academy office. The safer event app on both the PL and EFL CPS system shall be utilised.

All overseas tour venues shall be risked assessed and have periodic pre-tournament visits. This will be dependent on the venue, whether visited before and the age of the participants.

Pre-tournament documentation will be completed and will accompany any trip/ tour. This will be in accordance with both the Premier League and EFL requirements. Each risk assessment shall be completed and approved by Club officials.

#### 4.6.6 Welfare of Children

Parents/carers are expected to inform the Academy and the child's coach of any personal or medical problem their child may have so that we can offer the highest standards whilst the child is in the Academy's care.

Children who have been absent from school because of illness should not attend for training or matches. Their coach should be informed at the earliest opportunity.

#### 4.6.7 Children other than Academy Students.

The Academy understands that, because of the difficulties with Child Care arrangements, it may be necessary to bring the brothers/sisters of Academy students to training sessions and matches. If this is necessary, the Academy requires parents/carers to supervise and control their children at all times.

Academy staff has their own jobs to do and are instructed not to take responsibility for non-Academy children. On all occasions parents/carers are asked not to allow

their children out of the Academy building or away from pitches without supervision.

Children must not be allowed to play in car parks. The car parks at all Academy venues are dangerous places and parents/carers are reminded to supervise their children at all times to avoid accidents.

All academy parents are requested not to run their vehicle engines whilst watching academy games.

#### 4.6.8 Host Families

Host families provide accommodation for young players who are away from home.

These premises are risk assessed as are the hosts. An independent consultant Lisa Reynolds shall conduct matching and placement enquiries

These arrangements are made with the consent of the parents/guardians and will always be with complete agreement of all parties. Where the child is under 16 years of age the placement will be compliant with the local authorities' arrangements for "Private Fostering" This will be referred to by Club as AAA (Alternative Accommodation Arrangements).

Guidance documents can be obtained from the Head of Player care, Simon Crockett at [simon.crockett@wbaafc.co.uk](mailto:simon.crockett@wbaafc.co.uk)

- All family members of Family Accommodation Providers and any other person over the age of 16 years must be checked by the DBS every three years. They must possess an enhanced DBS check.
- All accommodation must be visited and examined on a regular basis.
- Family Accommodation Providers should encourage the young players to adhere to the "Rules and Regulations Sheet" which is designed for the benefit of the players.
- It is good practice to knock before entering a player's bedroom. This respects players' privacy.
- Cover for absence should be arranged by prior agreement with the player, the player's family and the Head of Education and Welfare, Nick Williams. [Nick.williams@wbaafc.co.uk](mailto:Nick.williams@wbaafc.co.uk)
- If sensitive issues arise, they should be discussed with the player in an open, honest, sympathetic, and frank manner but you must never promise to keep secrets
- The Host families shall be visited on a regular basis and examined for suitability and safety. All visits shall be recorded. Un announced visits shall be made. Placements of children shall be documented, and a suitable matching process shall take place.

- Training and safeguarding awareness shall take place with the Host Families. This will include the Club's commitment to 'Prevent'
- Always approach the WBA FC Staff about any sensitive matters. These will be treated in the strictest of confidence at all times.

#### 4.6.9 Transportation of Students

The Academy Transport Manager for WBA FC can be contacted at  
Chris.riley@wbafc.co.uk

##### The Transport Policy Summary

- Drivers will only transport students they have been officially authorised to transport. Drivers must check that the appropriate parental consent has been given. All drivers must have the appropriate business insurance.
- Drivers must ensure that all those being transported are wearing seat belts.
- Drivers must ensure that all those being transported remain seated throughout the journey.
- Should a driver be left with one student, they must ensure that the student is sitting in the rear of the car/minibus.
- Minibus drivers shall not make any alternative arrangement for the collection or delivery of any child. The drivers must ensure that where there is a change full parental consent is obtained and that football/foundation staff are informed.
- Great care must be taken when returning children to parents or nominated collector. Drivers/staff must ensure that the child is returned to parents or nominated persons only.
- All drivers who drive children as part of their role shall comply with the guidance issued regarding the transportation of children. All drivers should notify the transport manager of any change in health condition or an increased impairment to drive. Failure to do so may result in disciplinary action being taken.
- The policy shall also be governed by Driving Standards Policy of Club which is held at the academy and available upon request. The document outlines the Club stance on Penalty Points and endorsements. This can be found on the H drive of the Club internal data system

#### 4.6.10 Staffing

There should always be two coaches to each age group activity. In the event that a member of staff is unable to attend, they must let the Club know as soon as possible so that a substitute can be arranged. Only qualified and vetted staff may be used.

#### 4.6.11 Changing

At the beginning of a new group of training sessions it may be necessary to distribute kit to new students. Parents may assist their child should they require help in changing. For all further sessions students will arrive and go home in their kit. At the end of a series of sessions, when a kit is to be collected, parents may assist their child where necessary. Centres should make spare kits available should they be required.

Two members of staff should be present when students are changing. Consideration should be given to dignity and privacy. Staff will wait outside the changing areas, A member of the team will inform the staff when they are changed

Students must change only in areas which are suitable and to which the general public do not have access.

Students who begin or leave a session, other than at the start or finish, should be supervised by parents / carers and a member of staff.

All attendance and non-attendance shall be recorded

Staff must not get changed in the presence of students.

#### 4.6.12 Toilet Use

Parents should ensure students have visited a toilet before the student is given into our care. Where students meet collectively i.e. in changing rooms, they should be asked to visit the toilet before the start of a session.

In the event of a child aged 14 and under needing to use the toilet during a coaching session, they must be supervised by a member of staff or the child's parent/carer. Staff accompanying students should wait at the toilet door, so they are able to communicate with the student. They must not be present in the toilets at the same time. Respect for privacy must be maintained at all times.

The use of the 'port aloo' by students should not be allowed they should be directed to the academy building.

In the case of a 'toilet accident' a member of staff should, with a minimum of fuss, collect the student's parent/carer and take them to the changing room to be supplied with fresh kit. The parent/carer will supervise the student changing with

the coach nearby. The student should then be taken back to join the coaching group.

#### 4.6.13 Arrival Collection

Parents/carers must supervise students at all times before they come under the care of the staff. Parents/carers must inform staff if they are not collecting their own child and what alternative arrangements have been made.

At the end of every coaching session, staff must supervise the collection of individual students by their parent/carer. Students must not be allowed to leave in a group unsupervised. Parents who wish to speak to staff can do so when all the students have been collected. Under no circumstances are students to be allowed out of the venue alone or with anyone you do not recognise as being 'in loco parentis'.

In the event of parents not arriving to collect their child on time, staff should telephone parents using the number provided and then the emergency number.

In the event of a non-collection of a child, no more than **20 minutes** must elapse before you undertake emergency call procedures as per guidance given to all staff as of April 2022.

#### 4.6.14 Registration of New Students including trialists

Parents must complete the registration and medical information sheets. These should be checked carefully by staff before the student is allowed to participate in any activity. This is particularly the case with new starters.

Should there be any concerns about the student's medical form, staff should err on the side of caution and not allow the child to be physically involved until we are sure that training will not cause any problems. Staff should then obtain as much information as possible in order to refer the matter to the Club physiotherapist or doctor.

Essential information concerning students should be readily available for reference if necessary.

Parents and guardians must be made aware that the Club will hold and maintain data regarding them and their children. They must be told that the Club will maintain a single central record for safeguarding. The parents must be informed that all data will be stored and retained in accordance with GDPR and will be available for examination upon request (Exceptions may apply) They shall be informed via the parent and player booklet issued at the start of each season.

All single central safeguarding register information shall also be stored in accordance with NSPCC guidance (September 2019)

#### 4.6.15 Footwear



All students must wear suitable footwear and have shin pads if involved in a competitive activity. Spare shin pads can be used once they have been cleaned and sanitised appropriately.

---

## 4.7 Academy Physiotherapy Department

---

In compliance with West Bromwich Albion Football Club's Terms and Conditions of Employment, all physiotherapists employed to work in the Academy must have an enhanced DBS check.

All staff involved in the Academy will be trained in and adhere to West Bromwich Albion Football Club's Child Protection Policy and Procedures.

All members of staff should ensure that when treating or assessing a player with an injury on any part of the trunk or thigh that an adult chaperone is present. This chaperone may be the player's parent/carer or coach.

Privacy and respect to a student's needs shall be considered at all times.

All students should be treated as individuals. Please be mindful of treating young players as adults if they are representing age groups or adult teams above their age.

Please consider treating young players only with 'their' age group or team. Please try to avoid adult and young people mixed treatment or rehabilitation groups.

Members of staff must ensure that they have an adult chaperone present when dealing with any player in any hotel room.

No member of staff should enter a player's hotel bedroom without an adult chaperone being present.

The above shall apply to any sports scientist, sports therapists and analyst

### 4.7.1 Academy Use for Private Events.

From time-to-time academy facilities may be used for private functions. These may be 'hired' or free use for schools and charities etc.

These events must be subject to:

1. Service Level Agreements the SLA must be signed by both parties. They must set out the nature of the event the commencement and end times. They must clearly state what the activity is and the age range and capabilities of those participating and attending. There must be nominated person(s) contactable for the duration of the event and their responsibilities must be documented. This will include. Pre event risk assessment of the venue and facilities. The 'user' will have responsibility unless agreed otherwise for, supervision, first aid, any missing participants and the safety and security of the activity for

its duration.

The organisers must agree to the terms and conditions of West Bromwich Albion Safeguarding policy and must have read it. The Policy is available at the academy for inspection or via the West Bromwich Albion web site

<https://www.wba.co.uk/Club/Club-policies/>

In particular guidelines from to FA and the Club safeguarding policy in relation to imagery/taking photographs etc.

2. Ratios of supervision must comply with education and local government guidelines.
3. The activities and event must dynamically risk assessed should there be any change in the environment, equipment, supervision, or all foreseeable circumstances.
4. All events must be debriefed, and any incidents should be recorded and communicated to West Bromwich Albion FC and any other concerned parties. This will include emergency services, Health and safety executive and local authorities where relevant.
5. Once the event has concluded the academy facilities must be left in a clean and tidy condition. Any damage must be reported to the football Club as soon as is practicable.
6. All event documentation shall be retained in accordance with GDPR. Any activity can be stored on the Safer Event Management system at the Club for future reference.

#### 4.7.2 Academy Scouts

Talent ID scouts - youth.

West Bromwich Albion Football Club Academy shall recruit and train scouts as part of the talent identification processes carried out by the Club. Throughout any process the wellbeing of the child must remain paramount.

#### **Scouts' recruitment.**

Scouts shall be recruited through the recruitment department of the academy and in accordance with Club safer recruitment policies 2022. No scout shall commence duties until the completion of an enhanced DBS and two suitable references. The head of recruitment and deputy shall have responsibility for recruitment, vetting and appointment of scouts. Scouts shall receive safeguarding training and must have contracts of employment/engagement issued

Where scouts are employed by the Club they shall undergo 'right to work processes. Those scouts and volunteers shall all attend safer recruitment processes and shall be subject to vetting. Enhanced DBS checks shall be carried out by the safeguarding department of the Club before any appointment shall be made. The role 'scout' would not ordinarily require DBS to be undertaken but as our scouts may be requested to chaperone, DBS checks shall be carried out. All scouts must notify the football Club if there is any change in their

suitability to act as scouts. This shall include any notable involvement with criminal justice agencies or adult or children's services.

Failure to notify may result in a suspension of duties whilst the matter is reviewed by the academy management team.

A register of all scouts shall be maintained by the academy and regularly reviewed. Any CPD shall be noted against the scout safer recruitment record.

A code of conduct in accordance with FA guidelines and the talent I.D course content must be issued to and adhered to by all scouts. This will include strict guidelines regarding

All scouts must display or produce academy issued identification (I.D.) when representing West Bromwich Albion FC or on being requested to do so.

Scouts must not approach players directly.

Scouts must not carry out recruiting via social media and must maintain any personal social media accounts in accordance with Club directives concerning their role.

Scouts must not make any recording or take any imagery of any child/young person whilst scouting.

Scouts must report any safeguarding concern to safeguarding staff immediately. Any safeguarding concern can be reported to the Head of Safeguarding or the academy safeguarding officer. In the event of an emergency the usual emergency services should be contacted. See the emergency list in this policy.

Head of Safeguarding Chris Elliott. [Chris.elliott@wbafc.co.uk](mailto:Chris.elliott@wbafc.co.uk)

---

## 4.8 Match Day Operations

---

### 4.8.1 Home Matches

West Bromwich Albion Football Club recognises that it has overall responsibility for the effective operation of matchday activities and will seek to ensure that all staff has the ability and confidence to work supportively and positively:

### 4.8.2 Child Mascots

All staff escorting Match-day Child Mascots must have received Safeguarding Training and must be DBS checked. The coordinator and Safeguarding Officer for this activity is **Cindy Joyce**.

In all instances, Child Mascots must be accompanied by a parent/carer. Children, who have been brought along with the mascot, must remain under the supervision of a further parent/carer.

The parent/carer and escort will accompany the child mascots to the changing room. If the mascots require help with dressing, this will be done by the parents/carers. Should there be boy and girl mascots, arrangements will be made for them to change separately, and appropriate supervision arranged.

Escorts will accompany and hand over mascots to the team captains in the tunnel.

At the end of the formalities, the mascots will be accompanied off the pitch by the escorts and the parents/carers. Mascots will be taken by the escorts and parents/carers to change and then be accompanied to their seats.

If a child with additional health needs is used as a mascot, it is necessary to report this to Cindy Joyce who will make any suitable arrangements.

Parents/carers will be informed of the Club's Images Policy in information sent to them prior to the game. Should a mascot be subject to a Court Order, special reference must be made to the Images Permission Form.

The Club shall seek feedback from the child and parent from time to time to quality assure our processes and help to continual develop a safe experience.

### 4.8.3 Guidelines for Away Matches Under 18s

In the event of any away matches, in which under 18's is part of the travelling group, the decision to arrange an overnight stay can only be made by a senior member of West Bromwich Albion Football Club. This shall include first team and Under 23s

The criteria for such a decision will be that consideration is given to distance, time of kick-off and the age range of the team.

Should any away match involve under 18's, appropriate chaperones must be available. There must be the correct ratio of chaperones to players.

Without the correct ratio of chaperones to under 18's, under 18's players may not travel to the match.

A pool of chaperones should be drawn from parents or other suitable adults who must be DBS checked by West Bromwich Albion and have received the West Bromwich Albion Football Club Safeguarding Awareness training.

Team members cannot be used to act as chaperones.

Under 18s with under 23 and First Teams shall be dealt with in accordance with the FA, EFL and Premier League guidance. Under 18s are children and should be treated accordingly. There must be no intimidating, humiliating or harmful initiation ceremonies.

#### 4.8.4 Scouts

Talent Identification Scouts shall ensure all necessary steps are taken to protect from harm young people who participate in football at all levels; the guidelines equally exist to protect the Scout.

These guidelines clarify what is expected of an individual scout and highlights the steps to be taken to safeguard children and young people.

Where possible all scouts should be enhanced DBS checked and shall receive safeguarding awareness training. Although not a requirement of the role. WBA FC shall undertake DBS checks for scouts/chaperones.

The key principles are:

- The child's welfare is and must always be of paramount importance.
- All children have the right to be protected regardless of age, gender, culture, racial origin, religious beliefs, disability, or sexual identity.
- Close working with Birmingham County FA nominated person Sarah Willis, Junior Clubs, management, and the respective footballing bodies to ensure correct Safeguarding procedures are followed in identifying potential players for the West Bromwich Albion Football Club Academy.
- A transparent policy which concludes that West Bromwich Albion Football Club are determined that Scouting Procedures are followed and promote good practice towards all young people.



#### 4.8.5 Good Practice for Scouts

Pre contact of team management should be made where possible to notify them of your attendance at a fixture.

If pre contact is not possible, immediately on arrival at a fixture, contact must be made with the Team Managers responsible. Identification must be produced.

Gathering of information must only be done through the team management or parent at the beginning or end of the relevant fixture.

Permission from the Team Manager must be given prior to any discussion with the players' parents.

#### **Under no circumstances:**

- must Scouts approach players either before, during or after the games without management or parental presence, and only then with permission.
- should Scouts enter the dressing room areas of the teams involved.
- should Scouts escort players to toilets or dressing rooms at the request of team managers.
- should any photographic equipment be used in identifying players.

#### Scouts must

- ensure at all times they are in full view of the public and team management to avoid any false accusation;
- freely give Club contact numbers for clarification of identity when required;
- use as reference the FA's Child Protection Policy Guide (Child Protection Procedures and Practices Handbook).

Sound judgement must be used to avoid any unnecessary accusations of illegal approach. Do not allow yourself to be placed in a situation where no witnesses are present.

If information on a player is required but not forthcoming from the team management, simply note the team and age group and pass all information to the Academy Staff. Contact will then be made via Club Secretaries and the League Registration Secretaries.



#### 4.8.6 Children's 'Crèche'

In compliance with the West Bromwich Albion Football Club's Terms & Conditions of Employment, all staff employed to work in the crèche/players child room must have an enhanced DBS and provide satisfactory references.

Staff working in the crèche must: -

Receive appropriate West Bromwich Albion Football Club Safeguarding Training or equivalent and be safeguarding aware.

adhere to the West Bromwich Albion Football Club "Safeguarding Policy & Procedures";

be aware of how and to whom a safeguarding issue or concern is to be reported.

A Designated Person must be appointed whose role is known to all staff working in the crèche.

The OFSTED "Early Years" ratios must never be exceeded: -

- Children under 2 years - 1 adult to 3 children
- Children 2 – 3 years - 1 adult to 4 children
- Children 3 - 7 years - 1 adult to 8 children.

There must always be a minimum of 2 members of staff on duty.  
The crèche may operate for no longer than 1 hour 55 minutes.

The register must be kept for each match recording times of arrival and departure and should include parents' emergency mobile phone numbers.

All staff working in the crèche must be aware of the Stadium "Health & Safety and Fire Regulations and be trained to follow such regulations in the event of an emergency.

#### NB

As of 2021/22 Season, the Club crèche does not meet the criteria for crèche legislation and is not subject to examination by ofsted. The creche may operate outside of regulated hours.

#### 4.8.7 Stadium Tours - Club and The Albion Foundation (TAF) and Purchased Packages.

Children under 16 years of age will not be allowed on a tour unless they are accompanied by an adult.

All staff shall have completed an enhanced DBS and have followed the safer recruitment procedure.

If a child puts himself/herself in a potentially dangerous situation, staff should either alert the parent/carer/group leader or take immediate action themselves.

Staff should ensure that, during tours, parents/carers/group leaders take responsibility for their child/children's behaviour on Health & Safety grounds.

If a parent/carer/group leader accompanying young people behaves in an inappropriate way to one of their charges (e.g. using abusive language), this should be reported verbally to a Safeguarding Officer. In the case of school or group party, details of the name of the school or group and a factual account of the incident should be noted as soon as possible in written form. If the member of staff feels that it is appropriate for them to intervene in the situation, they might inform the parent/carer/group leader of the existence of the West Bromwich Albion "Safeguarding Policy & Procedures".

Common sense should prevail; staff should not put themselves in a situation of conflict or potential aggression.

If there is any doubt or concern about any Safeguarding issues, staff should refer to the West Bromwich Albion Football Club "Safeguarding Policy & Procedures".

---

#### **4.9 Child Sexual Exploitation (CSE)**

---

CSE involves exploitative situations, contexts, and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly ‘consensual’ relationship where sex is exchanged for affection or gifts to seriously organised crime from groups or gangs.

What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim.

Relevant staff who are most likely to identify and work with or support young people at risk of CSE (e.g. The Albion Foundation Education and Engagement team who deliver a vulnerable girls programme, work with young people in care, deliver Kicks etc) are trained locally in CSE identification, referral, and support.

---

#### **4.10 PREVENT – Preventing Radicalisation and Tackling Extremism**

---

The Government’s PREVENT duty came into force on 1<sup>st</sup> July 2015 and involves protecting children from the risk of radicalisation. Key WBA FC and The Albion Foundation staff have been trained, informed and are able to recognise vulnerability and mitigate the risks. Currently there are a number of factors that can make young people vulnerable to radicalisation and if there are any such concerns about a child or young person a member of the Safeguarding team must be informed immediately.

Young person’s attending at the academy as scholars shall receive prevent awareness training. Younger age groups shall receive training in their places of education.

Consideration upon recruitment and exit from the Club shall be given to a child’s or adults vulnerability and susceptibility to radicalisation. Staff shall be made aware of signs and areas for concern in this area.

The missing person policy shall reflect the commitment to our Club’s prevent duty. Prolonged unexplained absence or return after such absence shall be considered.

## Prevent Radicalisation Plan 2021/22

West Bromwich Albion Football Club are committed to complying with the requirements of National guidelines, the Premier League, and Sandwell Local Authority in ensuring our young people are free from the risk of radicalisation.

Whether it be in our Academy Football Club, foundation, or community games programme all staff must be aware of the signs of radicalisation and the vulnerabilities that may cause it to occur

Birmingham and the Black Country have seen many incidents of radicalisation occurring in our communities. Whether it be in places of education, or the work place it is an everyday challenge for our society

Extremism is varied and complex and can involve extreme right-wing persuasion or extreme Islamic fundamentalism.

Birmingham and the West Midlands has witnessed the placement of explosive devices and the murder of a man motivated by white supremacist extremism.

It has also seen young men and women from the area being radicalised toward Islamic extremism which has resulted in acts of terror at home and abroad.

### Methodology

In seeking to achieve this and to be compliant with requirements, the Club will maintain a programme of education and awareness for our players and staff which will seek to establish a resilience to any vulnerability.

The programme will be based upon the Prevent Strategy of the Premier League (v2) and shall include the Sandwell workshop toolkit.

Staff shall be made aware of the risks to players and how to recognise this and also to encourage reporting concerns through the normal safeguarding channels within the football Club or external agencies such as the MASH for Sandwell, NSPCC.

The Club will liaise the local West Midlands Counter Terrorism Unit Liaison and create a memorandum of understanding and good practice.

The Policy shall identify the Sandwell Prevent Coordinator. (Justin Nixon)

### Training for the staff. Scholars and Schoolboys

Training shall be delivered through in service training and or distance learning through the 'ncalt' course link. Training may include delivery from West Midlands Police Prevent and CTU training and outside agencies.

### Training for scholars

Training for scholars shall be delivered in house as part of the education programme and shall be delivered at the start of their scholarships and refreshed at each academic year.

The training shall be delivered in house and by external professionals.

The commitment to training and awareness shall also be reflected in the Club safeguarding policies and shall be endorsed at board level through the Club senior safeguarding management team (SSMT) safeguarding

Should any child, young person or staff member report or identify concerns the Club shall follow the Sandwell Prevent Referral Process.

The Club shall be committed to achieving standards in this area that are in accordance with the Sandwell Audit Process.

The processes and policies shall be reviewed and assessed against the Sandwell Audit Criteria in order to ensure that the risk to our staff and young people is minimised continually

The full guidance to these duties can be found here:

<https://www.gov.uk/government/publications/prevent-duty-guidance>

This guidance should be read in conjunction with other relevant guidance, which includes:

Working Together to Safeguard Children

<https://www.gov.uk/government/publications/working-together-to-safeguard-children>

## 5.1 UK Residential Courses & Tours

---

This section should be read in conjunction with the Premier League youth development rules 2021/22. It should be considered with the Academy document “Health and Safety”, Medical Procedures Policy and other relevant FA safeguarding guidelines and documents.

All tours shall be subject to a Risk assessment. It shall be completed in accordance with the Premier League and EFL Safe event management App. (SEM) on the CPS portal system.

Where practicable all overseas events shall be pre visited.

### 5.1.1 Guidelines: -

On arrival at any new venue a safety assessment must be made together with a fire/evacuation drill.

Frequently seek the views of the children either collectively or in small groups to ensure all are comfortable and satisfied with the conditions

- ✓ activities used with all groups are known and accepted by the Senior Coach.
- ✓ the Senior Coach must be informed and give approval to any changes to activities.
- ✓ a plan of activities must be kept.
- ✓ a programme of activities must be clearly outlined including any off-site activities e.g. swimming, bowling, football matches.
- ✓ they work in pairs especially in changing rooms/showering facilities.

### Coaches must NOT: -

- X shower with students or be in areas where showering takes place.
- X work alone with students behind closed doors. For confidential matters let someone know where you are. Ensure records are made
- X make favourites – make sure that all have access to selection and responsibility.

### Coaches should ALWAYS

- ✓ be accompanied and knock before entering a dormitory
- ✓ break up fights should they occur, but it is important not to use undue restraint.

- ✓ report the matter to the coach/ tour leader if a student is unwell.

Openness, absence of fear and lack of discrimination are essential in creating a safe and secure environment for both students and coaches in the residential situation.

---

## 5.2 Dealing with a Homesick Student

---

### 5.2.1 General

In younger students who are homesick can become very upset, and 'home sicknesses may become 'contagious amongst the group'. Such situations should be dealt with immediately and with sensitivity.

Be aware that in some cases this Residential Course/Tour may be the first time a student has been away without parents, and in the case of younger student this may be a considerable challenge.

Contact with parents and guardians and staff at the academy Club shall be undertaken as soon as you become aware of any difficulty

Homesickness should always be dealt with 'immediately'

### 5.2.2 Accommodation

Coaches in charge of dormitories where younger students sleep should keep a maintain a heightened state of vigilance of their group especially in the early days of the residential stay.

Coaches should ensure that all students in a dormitory are at ease with one another. Wherever possible, students should be allocated accommodation with friends or teammates where there is common compatibility and that their ages and physically ages are similar. If problems arise, they should first be dealt with in a sensitive but low-key manner. Because of the challenges to move/re-locate a student to another dormitory, moving should be a last resort, when all else had failed. A decision on moving will only be made after approval by the senior coaches.

### 5.2.3 Observations

Coaches should be particularly vigilant in the first few days of the residential, especially after afternoon coaching activities have finished. Although this is 'free time' for the students, coaches should be unobtrusively available. They may tell their charges where they may be found if required.

Coaches should get to know all their charges and be able to notice if any student is particularly quiet, withdrawn, or appears to have been crying. If there is a concern, it is advisable to have a quiet word with the student to find out what is troubling them. The senior coach or manger will be available for support.

### 5.2.4 Procedure

If it is discovered that a student is homesick, conversation should be positive about what the student enjoys. If the student is inconsolable, refer to the senior coach. If



phone calls have to be made, this must be approved by a senior coach who will give permission for the call to be made.

Should all attempts to console a student fail, parents/carers must be contacted and arrangements made for the student to return home. If the parents/carers cannot collect their child, a member of staff must be designated to accompany the child home. Parental consent must be given.

---

## Section 6

---

- 6.1 Best Practice in the Use of Images**
- 6.2 Employment within the United Kingdom**
- 6.3 Obtaining an Overseas Entertainment/Employment Licence**

---

## 6.1 Best Practice in the Use of Images

---

West Bromwich Albion Football Club is dedicated to the welfare and safety of its young players. As part of this commitment, in accordance with guidance from the Football Association, the only photography allowed at all Club activities will be that taken by designated Club officials. When taking photographs please ensure that: -

- All students are appropriately dressed.
- Photographs or recordings are focused on the activity and not on a particular student.
- Images are recorded in groups of at least four students
- Images of a student who is subject to a court order must never be used.
- Images published should not be accompanied by full name and/or personal details of the student.
- Parents/carers /students sign and return the 'Images Permission Form' at the start of each season
- All imagery taken by the Club within the stadium on match days shall be subject to the Ground Regulations at the Hawthorns. These shall include images of spectators.

---

## 6.2 Employment of Young People within the United Kingdom

---

In order to 'employ' young people in the United Kingdom, the regulations require: - In these circumstances a young person is defined as 16 to 18 years of age

Employ in this circumstance means 'paid'.

- a) A licence from the local Education Authority must be obtained if the activity is of five days or more.
- b) Written confirmation from the Head Teacher at the young person's school, where 'Leave of Absence' is required during term time and/or it may affect their educational attainment.
- c) Applications for the licence (obtainable from the Education Welfare Service) should be received by the Authority at least 21 days before any performance.
- d) Completed application forms should be returned with:
  - A copy birth certificate or other satisfactory evidence of a young person's age
  - Two identical, signed, recent photographs
  - A draft contract or agreement relating to the performance
  - A signed medical certificate from the young person's doctor.

---

### **6.3 Obtaining an Overseas Entertainment/Employment Licence**

---

It is the responsibility of West Bromwich Albion Football Club to obtain an Overseas Entertainment Licence for any U.K. young person used overseas for promotional activities. Licences are only issued by application to the Magistrates Court.

#### **6.3.1. Procedure**

In applying for such a licence the following documentation must be provided: -

- 1) A medical report from the young person's G.P. stating that the young person is fit and healthy to travel to the specified overseas location and is fit to perform the duties required
- 2) Written permission from the Head Teacher of the young person's school, if leave of absence is required during term time if he/she believes that the absence may affect the child's educational attainment.
- 3) A copy of the young person's contract, giving details of the nature of the work, terms and conditions, hours of work, names of chaperones, and all financial aspects.

The local police station must be given at least 7 working Days notice. The application to the police must state the nature of the journey and all the relevant details.

The Court must receive a response from the police before it will consider an application.

The applicant must contact the duty clerk at the Court to arrange a time/date – this is known as a Stipendiary Session. The Court may attach specific provisions within the licence e.g. hours of work etc.

---

## Section 7

---

- 7.1 Procedures to follow should a student not be collected at the end of a match or training session.**
- 7.2 Procedures to follow should a student express reluctance or refusal to return home at the end of a match or training session**

---

## **7.1 If a participant is not collected at the end of a match or training session**

---

### 7.1.1. Guidelines

In the event of a parent/carer failing to collect their child after a match or training session, the following procedure must be followed.

Under no circumstances must a child be allowed off-site or left unsupervised.

All possible attempts must be made to contact the parent/carer using Emergency Contact Numbers.

If contact cannot be made with parent/carer or approved emergency contact, the coach must contact Chris Elliott, Safeguarding Manager, the Police Child Protection Unit or Social Services for advice. See Section 3.1.3 - Contact Numbers for Designated Persons for Safeguarding at West Bromwich Albion

THEN: -

- The coach/staff member must record the telephone contact made including the name and position of the person contacted.
- Continue to try to contact the parent/carer and emergency contacts.
- Continue to seek advice from the Police/Social Services C.S.M.
- Keep senior West Bromwich Albion staff informed of the situation, including the Head of Safeguarding
- Prepare a full written report for the Head of Safeguarding
- Should it be necessary to transport the child home (with the permission of the parent/carer), it is preferable for two members of staff to accompany the child. The child must sit in the rear seat of the vehicle.

---

## 7.2 If a student is reluctant, or refuses to return home at the end of a match or training session

---

If a student speaks in confidence to a coach stating that they do not want to return home at the end of a session, the coach must remember that his/her first duty is to ensure the young person's safety.

### 7.3.1 Guidelines

- He/she must encourage the student to explain or give reasons why he does not wish to return home. Coaches must inform the Head of Safeguarding Chris Elliott, Simon Crockett or Andrew Wheeler or children's services.
- If the reasons given suggest that the student is being abused, coaches must inform Children's Services or the Police Child safeguarding Unit (contact numbers available in Section 3.1.3. or Chris Elliott, Head of Safeguarding
- If the young person has been involved in an argument at home, coaches must use their considered judgement as to whether the student would be at risk by returning home.

This involves responsible and serious decisions being made. Should coaches have any doubts they should immediately contact the Safeguarding Manager. Alternatively, Social Services or the Police Child Protection Unit may be contacted.

- If the reluctance to return home appears to relate to behavioural issues, petty quarrels at home, or trivial matters that do not put the young person at risk, the parents should be contacted to resolve the matter.

### 7.4.1 **Missing / Lost child.**

Any child unaccounted for more than 5 minutes should be regarded as missing. If not found after immediate search, enquires shall be undertaken and All relevant staff and parents shall be informed.

- Across the organisation there are several locations and activities where children will be reported missing/lost. These include match days at the Hawthorns, the Fan zone when in operation, academy activities and foundation activities.
- A separate Policy for the stadium is included in the match day briefing and training for stewards and stadium staff.



- A separate Policy for academy activities is produced and held by the academy staff. All staff receive training of missing child procedures as part of their continuous professional development.
- All staff at the Fan zone when in operation and contract security staff and safeguarding stewards are aware of the procedures for a missing child.
- A separate missing persons' policy for foundation activities out on site and at the education provision have been produced and are held by the foundation.

**If a child is located after a short period full detail must still be recorded in order to establish whether this is a regular occurrence which may give rise to other concerns**

---

## Section 8

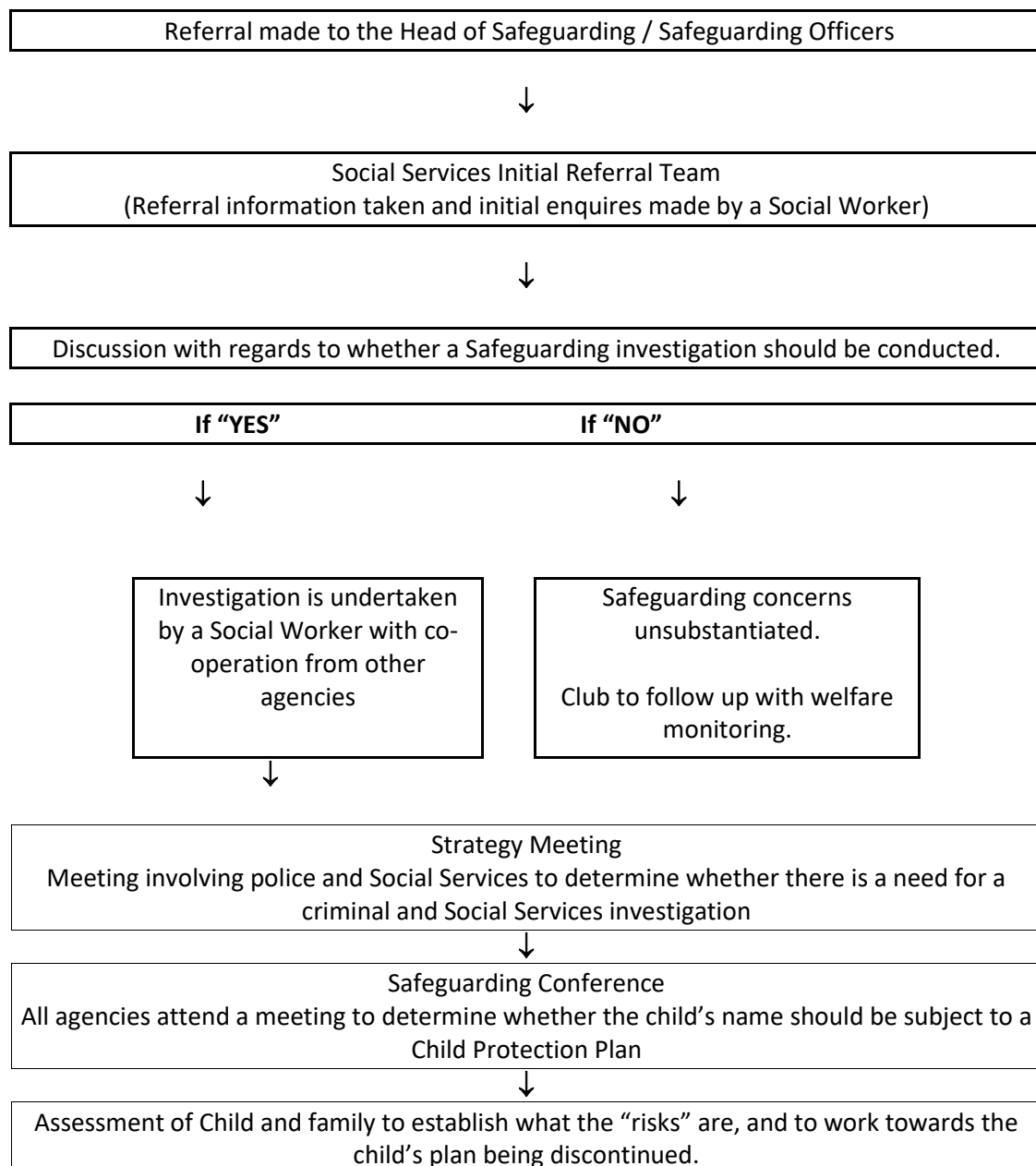
---

- 8.1 What Happens when a Referral is made**
  
- 8.2 Referral to the Safeguarding Officers**
  
- 8.3 West Bromwich Albion Football Club Referral Sheet**
  
- 8.4 Good Practice in Safeguarding**

---

## 8.1 What Happens when a Referral has to be made

---



---

## **8.2 Referral to the Head of Safeguarding or Safeguarding Officer**

---

**The Head of Safeguarding or Safeguarding Officer will require: -**

1. The name, date of birth and the home address of the child/young person.
2. The name and address of the person with parental responsibility for the young person.
3. A clear statement of any injuries or concern, and if medical attention is required.
4. Any explanation or comment the young person or their parent/carer may have made for marks, injuries, or behaviour; You should quote the child / carer verbatim. Do not interpret what is said or use your words / language.
5. (For Coaching Staff) A general 'picture' of the young person in respect of how they normally present themselves at training sessions or activities
6. Any other relevant or useful information.

The referral must be submitted on a West Bromwich Albion Football Club Safeguarding concern sheet or any note paper available. This will be stored electronically upon the 'My Concern' case management system. Originals shall be stored securely with the Safeguarding Lead.

---

**8.3 The West Bromwich Albion incident/concern sheet**

---

**West Bromwich Albion Football Safeguarding Concern Sheet**

Name of child/young person

.....

Date of Birth ..... Home telephone  
Number.....

Address .....

.....

Name and address of person with parental responsibility

.....

.....

.....

Nature of concern/Details of the incident, date & time

.....

.....

Urgent action taken (if any)

.....

.....

Date referred to Designated Person

.....

Name of Referrer .....

Name & Telephone number of Child/Young Person's General Practitioner  
.....  
.....

Has the Family been informed of the concerns?  
.....

Any other relevant information e.g. relations with any other team member, changes in  
Attitude, behaviour, performance.  
.....  
.....

If any information is not available, or if you need help in completing this referral sheet, discuss the matter with the Head of Safeguarding / Safeguarding Officer.

---

## 8.3 Good Practice in Safeguarding

---

### 8.4.1 Record Keeping

The electronic recording system **My Concern** can be completed by all staff with access. The system is safe and secure and complies with GDPR

Always make an accurate record of the things you have observed or have been told. This should include a note of the date and time of a particular incident, or when a particular concern came to your attention. If a young person has told you something, it is essential that you write this down in the young person's own words. The written record should include a note about the size and appearance of any injury (a sketch is helpful). Injuries a young person arrives with at the start of any session should be noted: any injuries received during a session should always be recorded in the "Accident Book". This information will be useful when making a referral about suspected abuse. Your Safeguarding Officer may ask to see these records should there be further conduct to Children's Services.

WBA FC use 'My Concern' to record safeguarding and welfare concerns and any referrals.

### 8.4.2 Confidentiality of Information

The purpose of confidentiality is to protect young people, by providing appropriate privacy to young people and their families. West Bromwich Albion Football Club will ensure that abusers are not assisted by access to confidential information. Information (written or verbal) should be shared only on a need-to-know basis. All Safeguarding records should be kept separately from a young person's open records. They should be kept in a secure place and be accessed only by designated persons. Parents, Club staff and officials have no right of access to separate Safeguarding Records which remain confidential at all times.

Concerns shall be recorded on the 'My Concern' system

### 8.4.3 Listening and Re-Assuring

Young people need to be listened to and allowed time and space to talk about their experiences, even if they might have chosen a time inconvenient to you. They need to know that they are being taken seriously and be reassured that they have done the right thing in telling you about their concern.

### 8.4.4. Appropriate Questioning

It is important to know that interviewing young people in cases of abuse is a specialist role, which should be done only by trained social workers and police officers. Remember that the young person may be asked to talk to someone else at a later stage. Try to avoid interrupting or questioning the young person and instead allow them to talk at their own pace and in their own words but you can reassure that the young person is being taken seriously.

#### 8.4.5. Your Own Feelings

Try not to make assumptions about what you are told and avoid using emotive words such as 'rape' 'assault' or 'beating' which might make the experience of telling even more difficult. It is important not to criticise the abuser e.g. 'X is a bad person'. Try not to project your own feelings onto the young person. It might help you to sort out your own feelings if you talk to the Designated Person later.

#### 8.4.6. Never Make Promises

Be honest and realistic: you should never promise not to tell or say you can do something you are unable to do. You have a duty to pass on any allegations or suspicions about abuse to the appropriate person. If you are going to pass information on, it is right to let the young person know why you are doing this and who you will be contacting. Older children will naturally be able to understand more fully what is to happen.

If you are trouble or worried about reporting a matter or are concerned if the concern turned out to be unsubstantiated you can talk this through with the head of safeguarding or H.R Sam Foxall. The Club whistle blowing policy outlines support for any staff member in these circumstances and can be found on the Club web site or via the Club internal drive system

#### 8.4.7. Relationships with Parents/Carers

If there is any reason to believe that alerting the parent/carer might compromise the young person's welfare, you are advised not to discuss the matter with the parent/carer, but you should contact the Designated Person immediately. Otherwise, if you see an injury about which you have suspicions or you have concerns about a young person's behaviour or welfare, you should ask the parent/carer for an explanation. If the parent/carer, when asked seems unaware of the injury, or will say nothing at all, is evasive or is inappropriately hostile, this may support your suspicions that the injury was non accidental. Tell the parent/carer that you are concerned. Say that injuries to young people must be investigated because young people are vulnerable. Say that there is a procedure you must follow. Tell the parent/carer that the procedure is to provide help for parents/carers as well as protection for children.

#### 8.4.8. Urgency

Prompt action needs to be taken in all instances in which abuse is suspected or discovered.



---

## Section 9

---

- 9.1 West Bromwich Albion Football Club Safeguarding Policy & Procedures Summary**
  
- 9.2 West Bromwich Albion Football Club Anti-Bullying Policy**
  
- 9.3 West Bromwich Albion Football Club Additional Needs Policy**
  
- 9.4 To be read and considered in conjunction with the Adults at risk 2022 Policy.**

---

## **9.1 West Bromwich Albion Football Club Safeguarding Policy & Procedures Summary**

---

### **9.1.1 POLICY**

- This document must be read in conjunction with West Bromwich Albion Football Club's Safeguarding Policy & Procedures which is available from Head of Safeguarding or Safeguarding Officers.
- The procedures outlined in this document are designed specifically for West Bromwich Albion Football Club in particular, for all staff who come into direct contact with children and young people who may be, or may become, victims of abuse
- West Bromwich Albion Football Club is committed to ensuring that all staff have the ability and confidence to work supportively and positively in order to ensure that within their skill area, they are empowered to fulfil the spirit of this policy.
- The Procedures and guidelines apply to all children and young people under the age of 18 who are associated with the Club in any capacity. This includes matchday attendees, visitors to the ground, shop or other facilities, Academy members and The Albion Foundation participants.

### **9.1.2 Procedures**

- All children and young people who attend any designated activity at or with West Bromwich Albion Football Club have access to "Independent Persons" and a complaints procedure. In all Safeguarding issues, the Club will work under the guidance of the local safeguarding children board.

### **9.1.3. West Bromwich Albion Football Club – Safeguarding Officers**

Safeguarding Officers are trained and qualified in all aspects of Safeguarding to ensure that systems are in place to protect the welfare of children and young persons. Activities include the Academy, The Albion Foundation, Media, Retail, Match Day Experience (including Fanzone, Player Mascots), each of which has an appointed Safeguarding Officer

All such staff shall receive appropriate training in "Safeguarding Awareness" and West Bromwich Albion Football Club's "Procedures" for implementing its Safeguarding Policy.

West Bromwich Albion Football Club will ensure that all staff are checked as to their suitability to work with children and young people.

The parents and carers of children and young people enrolling with

West Bromwich Albion Football Club will be informed of its “Safeguarding Policy and Procedures”. The Club will regularly seek feedback on its safeguarding provision from participants, staff, and parents.

## **9.2. If Abuse is Suspected**

9.2.1 If a child makes any allegation of abuse, it is strongly advised that the person receiving the information should, where possible, have another member of staff present. If this is impractical, the member of staff should, for his or her own protection, make every effort to inform a senior member of staff what she / he is doing.

9.2.2 Should an allegation of abuse be made; this should be reported to the Head of Safeguarding or Officer. See Section 3.1.3, Safeguarding Policy & Procedures – Contact Numbers for Designated Persons for Safeguarding at West Bromwich Albion Football Club.

9.2.3 In all cases of suspected abuse, the concerns should only be discussed with the Head of Safeguarding or Officer. Confidentiality must be maintained at all times.

## **9.3. In Cases of Suspected Abuse**

9.3.1 If a specific incident or injury gives cause for concern or if a child or young person says that something has happened to them that falls within the remit of “Recognised Abuse”, the Head of Safeguarding must be contacted immediately and a “West Bromwich Albion Football Club Referral Sheet” must be completed.

9.3.2 A list of Children’s Services/Safeguarding contact numbers is provided in Section 3.1.3, Contact Numbers for Designated Persons for Safeguarding, to enable the Head of Safeguarding or Safeguarding Officer to contact Social Services for referral or advice.

## **9.4. In Cases of Non-Specific Abuse**

9.4.1 Concerns can sometimes arise about a child or young person without any specific incident or injury having occurred. These may be concerns that a member of staff has monitored over a period of time and should be discussed with appropriate Safeguarding Officer.

9.4.2 It is important to mention any concern as this could be vital in preventing a situation from becoming worse. In these circumstances, the concern should be written up on the “West Bromwich Albion Football Club Referral Sheet” and urgent contact with the appropriate Safeguarding Officer or Head of Safeguarding should be made.

9.4.3 The Head of Safeguarding will consider whether to convene a “Child in Need” meeting. A “Child in Need” meeting would decide whether a referral to Children’s Services is required or whether advice should be sought from the Children’s Services Contact.

## **9.5. In the Case if an ‘Allegation’ is Made Against a Member of Staff**

- 9.5.1 All incidents or allegations of abuse involving a member of staff must be reported to the Head of Safeguarding or Safeguarding Officer immediately or as soon as practically possible on that day.
- 9.5.2 In the event of the Head of Safeguarding or Safeguarding Officer being the subject of concern, then this must be reported to his deputy who will then undertake the role of Head of Safeguarding for the purpose of this investigation Mark Miles and Barney Ellis (Senior Counsel) must be informed

## **9.6 All allegations of abuse against a member of paid or voluntary staff, should be referred to the Local Authority Designated Officer.**

### Allegations of Abuse

- 9.6.1 In all cases of alleged abuse the Head of Safeguarding must report the concerns to the Police Child Protection Unit. The Police, as a matter of course, will refer to the local Children’s Services.

**N.B:** The child or young person should not be questioned by anyone other than the police and Children’s Services, or the “Independent Advisor” if the Joint Investigative team agrees that the “Independent Advisor” can speak to the child or young person.

- 9.6.2 The parents of the child or young person should be informed of the concerns and of how the matter is being dealt with.
- 9.6.3 On the advice of the Police/Children’s Services, the Head of Safeguarding will inform the employee that he/she will be withdrawn from his duties that day.

**N.B:** If the suspended staff member has any other employment that involves working with children or young people, that employer should be informed following consultation with the Local Authority Designated Officer. LADO Sandwell. Contact details can be found in the Useful Contacts below.

- 9.6.4 The Independent Advisor will be called in. He/she will advise West Bromwich Albion Football Club of the appropriate course of action in respect of ensuring the protection of all children or young people working with the Club. The Independent Advisor will:
- help the Head of Safeguarding look at the allegations against the staff member.
  - attend any Strategy Meeting convened by the Joint Investigative Team to advise and assist the Safeguarding Manager
  - liaise with the relevant Children’s Services Department on behalf of West Bromwich Albion Football Club.

9.6.5 In the event of there being no police prosecution, a separate assessment of the staff member should be carried out to determine whether the staff member should continue to work with children or young people or whether the employee should be dismissed, in line with the Company's disciplinary procedure.

**9.6. Allegations of Abuse Carried out by Children and Young People**

9.6.1 When it is alleged that the abuse of a child or young person has been carried out by another child or young person, it is important that the Child Protection Procedures should be followed in respect of both the victim and the alleged abuser.

9.6.2 When such an incident is alleged, it should be reported immediately to the Designated Person. This will ordinarily be the Safeguarding Lead, Mark Miles or the Head of Safeguarding Chris Elliott. Whilst these allegations are being investigated, West Bromwich Albion Football Club, in conjunction with the Independent Advisor, need to consider whether the child or young person accused should continue to attend any Club activity because of the risk they may pose to others.

8.3 Contact Numbers for West Bromwich Albion Football Club's Safeguarding team see pages 21 and 22

The Head of safeguarding is [Chris.elliott@wbafc.co.uk](mailto:Chris.elliott@wbafc.co.uk) 07976660953

The following are other useful contact numbers:

<b>Education in Children Services</b>		
– Advice & Referrals	-	0845 351 0131
<b>FA/NSPCC Helpline</b>	-	0808 800 5000
<b>Asian Helpline</b>	-	0800 096 7719
<b>Sandwell Hospital</b>	-	0121 553 1831
<b>West Bromwich Police Station</b>	-	101
<b>Disclosure &amp; Barring Service</b>	-	0870 909 0811
<b>Sandwell Race Equality Unit</b>	-	0121 541 1775
<b>Walsall Children's Services, Social Care</b>	-	01922 658170
<b>Sandwell Child Protection Local Authority Designated Officer. (LADO)</b>	-	0121 5694770
<b>Walsall Local Authority Designated Officer. (LADO)</b>	-	01922 654040

---

## 9.2 Anti-Bullying Policy

---

### **POLICY**

- West Bromwich Albion Football Club's aim is to promote an ethos within a safe environment in which children and young people who attend West Bromwich Albion Football Club have a fundamental right to be free from bullying and intimidation in all of its forms. This includes cyber bullying online such as, social networking sites, texting, tweeting etc.
- In issuing this policy, West Bromwich Albion Football Club has three main objectives:
  1. To encourage all coaches and staff working with West Bromwich Albion Football Club to take an active role in combating all forms of bullying.
  2. To ensure that no person, employee, or child participates in any form of bullying.
  3. To demonstrate to all children and young people that they can rely upon West Bromwich Albion Football Club's support in cases of bullying and that all reported cases are dealt with efficiently, effectively, and fairly.

### **PROCEDURE**

#### 1. General

Bullying may include any unwanted verbal or physical abuse and/or advances and/or behaviour which a child or young person may find offensive, and which causes them to feel threatened, humiliated, patronised, distressed or harassed. It will not necessarily be a defence that such incidents consist of words or behaviour which might be claimed to be "common place", or which were intended as a joke or were not intended to be offensive.

Bullying is the repeated, deliberate attempt by an individual or group to hurt, torment, tease, frighten or upset someone causing him/her to feel intimidated, uncomfortable, or unhappy. Bullying includes racist and homophobic behaviour.

Examples of bullying may include: -

- Name calling
- Teasing
- Hitting, pushing or unwelcome physical contact
- Demanding food or money
- Passing comments about someone of their family
- Tripping, punching, or hair pulling
- Forcing or encouraging someone to do wrong
- Belittling

- Bullying is equally as likely to occur online on social media as it is face to face.
- Hiding items

Bullying can often take place through “cyber bullying” on-line, texting, or other social media such as Facebook etc.

Bullying can be the physical, mental, or emotional abuse of a person. It can take many forms, some more obvious than others. The above examples are not exhaustive, and each incident of bullying will be viewed on its individual facts. Bullying may be deliberate or unconscious, open, or covert, direct, or indirect, an isolated incident or a series of repeated actions. It may also include, in certain circumstances, off-duty conduct.

Separate training and guidance forms part of West Bromwich Albion’s commitment to safeguarding and protection from bullying.

## 2. Procedure

Bullying is best prevented by staff being alert and aware at all times to ensure that -

- all students, children and young people who take part in West Bromwich Albion activities are aware that bullying will not be tolerated.
- if bullying is suspected or spotted, it should be dealt with immediately in a sensitive manner. Coaches and activities designated staff should speak to the student, child, or young person they suspect is being bullied to try to determine what the problem might be. If the student, child, or young person alleges bullying is taking place, details of the incident/s should be taken.
- a student, child, or young person against whom the allegation has been made should be sensitively questioned. Two members of staff should always be present when questioning takes place, although care should be taken that their presence is not intimidating.
- if the allegation is serious i.e., severe physical abuse or persistent emotional abuse the senior coaches and the activities designated person must decide whether the student will continue within the activity.
- parents should be informed in all circumstances – parents also have a responsibility.
- parents of students who are responsible for bullying others must be involved in, and support, any disciplinary actions the coaches and activities designated staff decide are appropriate.

Parents should be encouraged to inform coaches if they suspect their child is being bullied. Once such an allegation is made, the above strategies should be applied.



### 3. Guidelines

Coaches and staff need to be aware that it is important that during coaching sessions or other West Bromwich Albion Football Club activities that they do not intimidate belittle or undermine a student, child, or young person.

NB: Adults, too, may be guilty of bullying!

Therefore, please ensure that you avoid -

- Sarcasm and humiliation, no matter how playfully delivered.
- Aggressive, abusive shouting or bad language.
- Use of excessive physical punishments i.e. 'press-ups'

As professionals, coaching staff must be models of fairness:

- Competition is healthy but reticent students are to be encouraged not penalised.
- Criticism should **ALWAYS** be constructive.
- An early apology or clear explanation of intent by a coach will often prevent misunderstandings.

Bullying is a form of harassment and will not be tolerated by West Bromwich Albion Football Club under any circumstances. Any member of staff who bullies another employee, student, child, or young person with the Club, will be subject to disciplinary action, in line with the Company's disciplinary procedure. In serious cases, such behaviour may constitute gross misconduct and result in summary dismissal.

---

## 9.2 An Outline of the “Additional Needs” Policy for Activities at West Bromwich Albion Football Club and The Albion Foundation

---

**NB. This section should be considered together with the Adults at risk Policies of West Bromwich Albion.**

West Bromwich Albion Football Club is committed to meet the individual additional needs of all young people who take part in WBA FC related activities, or The Albion Foundation programmes. (TAF)

The overall aim of this policy is to ensure: -

- a) That the individual additional needs are identified and subsequently met.
- b) That parents are involved integrally with the process and development of their child in community programmes.
- c) That all young people who attend West Bromwich Albion Football Club community programmes feel valued, motivated, and confident both about themselves and their work.
- d) That all West Bromwich Albion Football Club and Foundation staff have the ability and confidence to work supportively and positively in order to ensure that within their skill area, they are empowered to fulfil the Club’s policy on Additional Needs.

The objectives of this policy are established to ensure we commit to

- a) Structures to make provision for young people with Additional Needs.
- b) Structures to provide community staff with the skills and professional knowledge of how to work effectively with young people with Additional Needs.
- c) Structures which continue to identify the changing need of resources.

---

## 10.1 References

---

1. The Children Act, 1989 and 2004
2. Working Together to Safeguard Children 2018.  
Department for Children Schools and Families
3. The Bichard Inquiry Report, June 2004  
Stationary Office and the National Enquiry 2021 into abuse in  
sport/football)  
Sheldon Enquiry 2021
4. Sexual Offences Act, 2003 (Chapter 24)
5. Child Protection Policy & Procedures of Walsall and  
Sandwell Safeguarding Children Boards.

NB. The West Bromwich Albion football ground and the Foundation are located within **Sandwell Children's Services** area of responsibility. The training ground is situated within the **Walsall Children's Services** area of responsibility