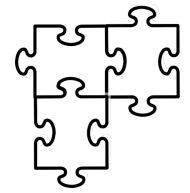




WEST BROMWICH ALBION FOOTBALL CLUB

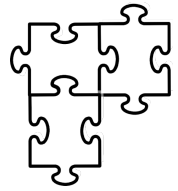
SAFEGUARDING CHILDREN POLICY





Contents Page

CONTENTS PAGE	
Page 2	From the Board
Page 3	Principles & Purpose Of The Policy
Page 3	Key Safeguarding Principles
Page 4	Types of Abuse
Page 14	Safeguarding Procedures for the Staff, Volunteers External Parties and Subcontractors
Page 22	How To Report a Concern
Page 23	Allegations Against Staff
Page 25	Use of Photography and Imagery
Page 26	Late Collection/ Non-Collection of Children
Page 28	Supervision Ratios and Lone Working and One-to-One
Page 29	Legislation and Key Safeguarding Contacts
Page 30	Other Related Documents, Procedures and Guidance



From The Board



West Bromwich Albion Football Club Board Statement

Ron Gourlay CEO:

Everyone at West Bromwich Albion Football Club are fully committed to safeguarding and promoting the welfare of every child, young person and adult at risk who we engage with. We will ensure that we provide safe environments for everybody and that our safeguarding policies and Strategic Safeguarding Plan reflects our commitment to this.

West Bromwich Albion Football Club Policy and Related Procedure for Safeguarding Children

Our mission at West Bromwich Albion Football Club is to create an enjoyable, safe, secure environment for all. We will develop exemplary staff across the organisation to listen and respond to the needs of all we engage with.

Principles & Purpose Of The Policy

Everyone at West Bromwich Albion Football Club are fully committed to safeguarding and promoting the welfare of every child and young person who we engage with.

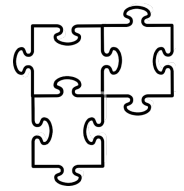
We will ensure that we provide safe environments for everybody. Our safeguarding policies and Strategic Safeguarding Plan reflects our commitment to this.

In applying this policy and procedures the Club will seek to develop an environment that enables all children and adults at risk to safely participate and enjoy all club activities. This equally applies to the safety and security of those working with and responsible for the activities.

This policy applies to the whole of the football club and is to be observed by all those working with children. The application of this policy and procedures across the Club, promoting safeguarding good practice is mandatory.

Key Safeguarding Principles

- The welfare of children is paramount.
- Safeguarding is everyone's responsibility.
- All suspicions and allegations of poor practice or abuse will be taken seriously and responded expeditiously and appropriately.
- Ensuring that staff, coaches, parents and other staff who meet children and adults at risk are good role models.
- Working in partnership with other organisations, children and their parents/ responsible person is essential.
- The recording of all safeguarding incidents on an electronic platform for future scrutiny and to identify any emerging trends.



Types of Abuse

Physical Abuse:

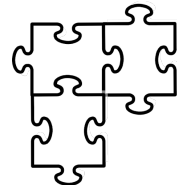
This is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional Abuse:

This 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 a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), 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.

Sexual Abuse:

This is perpetrated by both men and women. Children can also abuse other children (Peer on Peer 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse.



Types of Abuse

Child Sexual Exploitation (CSE):

CSE is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity

- In exchange for something the victim needs or wants, and/or
- for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

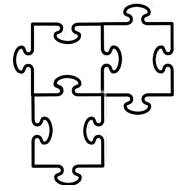
County Lines:

This is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of 'deal line'. They are likely to exploit children (disabled children are particularly vulnerable) to move and store the drugs and money, and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

Neglect:

This is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate caregivers)
- ensure access to appropriate medical care or treatment It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.



Types of Abuse

Grooming:

This very commonly plays a key part in the sexual abuse of children. It refers to a process by which an individual manipulates those around them –typically (but not only) the child – to provide opportunities to abuse. It can involve communication with a child where this is an intention to commit a sex offence in person and/or online.

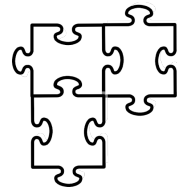
Extremism and PREVENT:

This goes beyond terrorism and includes people who target the vulnerable, including the young, by seeking to sow division between communities on the basis of race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in our society.

Extremism is defined in the Counter Extremism Strategy 2015 as the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. Calls for the death of members of our armed forces is classed as extremist.

The Prevent Duty is part of the UK Counter Terrorism Strategy (CONTEST), based on the Counter Terrorism and Security Act of 2015. It requires public bodies, including local authorities, the police, prisons, providers of probation services, schools, colleges, and universities to act to prevent people from being drawn into terrorism, ensuring awareness of risks of terrorism.

The Prevent duty applies to those bodies, which include, for example, children's homes and independent fostering agencies and bodies exercising local authority functions whether under voluntary delegation arrangements or via the use of statutory intervention powers. These bodies should ensure they are part of their local authorities' safeguarding arrangements, and that staff are aware of and know how to contribute to Prevent-related activity in their area where appropriate.



Types of Abuse

Extremism and PREVENT: (Continued)

The Club recognises that some children and young people are more vulnerable to radicalisation, including those who may be isolated/marginalised in society (through mental health or disability) and may have no other support. Children who attend sports activities are not immune from this risk and therefore the Club and The Albion Foundation (TAF) ensure that all staff who work with children and young people are equipped at identifying potential indicators of abuse in regard to radicalisation and extremism.

There are some physical signs that would indicate concerns relating to extremism such as the tattoos that far right organisation supporters will sometimes display.

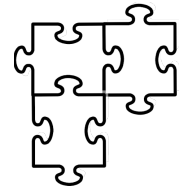
Any concerns you have will usually be similar to other Safeguarding concerns. These may include changes in behaviour; you should use your judgement to decide when these are worrying and when they are within the normal range.

There are concerns which should always be passed on such as:

- evidence of sharing of extremist websites
- evidence of homophobia
- religion based or racist bullying

Female Genital Mutilation ("FGM"):

Involves procedures that intentionally alter or injure female genital organs for non-medical reasons. The procedure has no health benefits for girls and women. The Female Genital Mutilation Act makes it illegal to practise FGM in the UK or to take women and girls who are British nationals or permanent residents of the UK abroad for FGM whether or not it is lawful in another country.



Types of Abuse

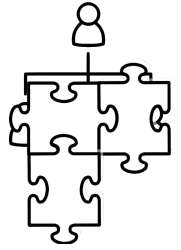
Bullying:

This is the use of aggression with the intention of hurting another person this may be by an adult towards a child or peer on peer abuse. Bullying results in pain and distress to the victim. Bullying can be:

- Emotional being unfriendly, excluding (emotionally and physically) sending hurtful text messages, tormenting, (e.g. hiding football boots/shin guards, threatening gestures);
- Physical pushing, kicking, hitting, punching or any use of violence;
- Sexual unwanted physical contact or sexually abusive comments;
- Discriminatory comments, jokes about or targeted abuse aimed towards disabled children, homophobic, transphobic, sexist, gendered, racist or faith based comments;
- Verbal name-calling, sarcasm, spreading rumours, teasing.

Cyberbullying:

This when a person uses technology i.e. mobile phones or the internet (social networking sites, chat rooms, instant messenger, tweets), to deliberately upset someone. This could take the form of posting derogatory abusive comments, videos or images on social media. Bullies often feel anonymous and 'distanced' from the incident when it takes place online and 'bystanders' can easily become bullies themselves by forwarding the information on.



Types of Abuse

Discriminatory Abuse:

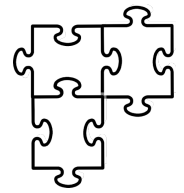
Abusive or bullying behaviour because of discrimination occurs when motivated by a prejudice against certain people or groups of people. This may be because of an individual's ethnic origin, colour, nationality, race, religion or belief, gender, gender reassignment, sexual orientation or disability.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

Poor Practice:

This is behaviour that falls short of abuse but is nevertheless unacceptable. It is essential that poor practice is challenged and reported even where there is a belief that the motives of an individual are well meaning. Failure to challenge poor practice can lead to an environment where abuse is more likely to remain unnoticed. Incidents of poor practice occur when the needs of Children and Young People at Risk are not afforded the necessary priority, compromising their welfare, for example, allowing abusive or concerning practices to go unreported, placing Children and Young People at Risk in potentially compromising and uncomfortable situations, failing to ensure the safety of Children and Young People at Risk, ignoring health and safety guidelines, or giving continued and unnecessary preferential treatment to individuals.

Hazing:

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



Types of Abuse

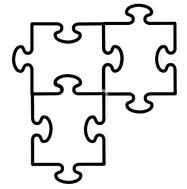
Peer-on-peer Abuse:

Children can abuse other children. This is most likely to include, but may not be limited to:

- Bullying (including cyberbullying);
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- Sexual violence, such as rape and sexual assault;
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- 'Upskirting', which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- Sexting (also known as youth produced sexual imagery); and
- Initiation/hazing type violence and rituals.

Infatuations:

Children and Young People at Risk may develop an infatuation with a member of Staff who works with them. Such situations should be handled sensitively to maintain the dignity and safety of all concerned. Staff should be aware that in such circumstances, there is a high risk that words or actions may be misinterpreted and that allegations could be made against Staff. They should therefore ensure that their own behaviour is above reproach. A member of Staff who becomes aware that a Child and Young Person at Risk may be infatuated with him/her or with a colleague, should discuss this at the earliest opportunity with any member of the Safeguarding Team.



Types of Abuse

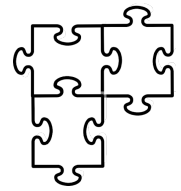
Domestic Abuse

Domestic abuse is any type of controlling, bullying, threatening or violent behaviour between people in a relationship. It can seriously harm children and witnessing domestic abuse is child abuse. It's important to remember that domestic abuse:

- Can happen inside and outside the home;
- Can happen over the phone, on the internet and on social networking sites;
- Can happen in any relationship and can continue even after the relationship has ended;
- Both men and women can be abused or abusers.

Child Criminal Exploitation:

Is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology.



Types of Abuse

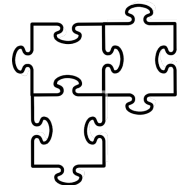
Forced Marriage

A forced marriage is a marriage in which one or both of the parties are married without their consent or against their will. It is recognised as a form of violence against women, men or children and is a serious abuse of human rights. A forced marriage differs from an arranged marriage where family members take the lead in choosing the partner but both parties are free to choose whether they marry the chosen partner or not. Forced marriage is illegal in England and Wales. The Anti-Social Behaviour, Crime and Policing Act 2014 made it a criminal offence from June 2014 to force someone to marry. In a situation where there is concern that an adult is being forced into marriage they do not or cannot consent to, there will be an overlap between action taken under the forced marriage provisions and the adult safeguarding process. In this case action will be co-ordinated with the police and other relevant organisations. The police must always be contacted in such cases as it involves a criminal offence and urgent action may need to be taken.

Honour Based Violence

Honour based violence is a violent crime or incident which may have been committed to protect or defend the honour of the family or community. It is often linked to family members or acquaintances who mistakenly believe someone has brought shame to their family or community by doing something that is not in keeping with the traditional beliefs of their culture. For example, honour based violence might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion
 - want to get out of an arranged marriage
 - want to get out of a forced marriage
 - wear clothes or take part in activities that might not be considered traditional within a particular culture
- Women and girls are the most common victims of honour based violence however it can also affect men and boys. Crimes of 'honour' do not always include violence.



Types of Abuse

Honour Based Violence (Continued)

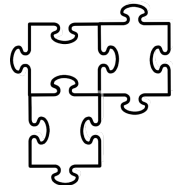
Crimes committed in the name of 'honour' might include:

- domestic abuse
- threats of violence
- sexual or psychological abuse
- forced marriage
- being held against your will or taken somewhere you don't want to go
- assault

Child Trafficking and Modern Slavery

Child trafficking is the movement of a young person for the purpose of exploitation. This includes:

- A young person being bought or sold for money.
- A young person being tricked into leaving home.
- A young person who is given away by their family because the family need money.
- A young person who is made to leave their home because of war.
- A young person who chooses to leave home, thinking they are going to a better life. The move of the young person can be international or within the same country. There could be lots of reasons the person has moved including:
 - Sexual exploitation
 - Forced labour
 - Domestic servitude
 - Organ harvesting
 - Child related crimes such as child sexual exploitation, forced begging, illegal drug cultivation, organised theft, related benefit frauds etc.
- Forced marriage and illegal adoption (if other constituent elements are present) The reasons for the move generally benefit the people who take the young person and the people who exploit or abuse them. The young person does not benefit from the move. In fact, in most cases the young person suffers because they have been forced or tricked into moving.



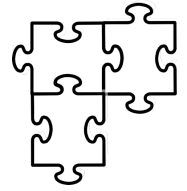
Safeguarding Procedures for Staff, Volunteers, External Parties and Subcontractors

Maintaining professional boundaries and appropriate behaviours

Everyone who works or volunteers with children is responsible and accountable for the way in which they behave towards them and every child has a right to be treated with respect and dignity. It's expected that all adult-child relationships maintain clear and appropriate boundaries at all times, are supportive, positive and aimed at improving the child's skills, development and progress. Adult-child relationships should all focus on the respective activity/event. Good safeguarding practices protects everyone. The EFL has produced a guide entitled "Safer Working Practice" a copy of which has been received by all staff and can be requested from The Head of Safeguarding. Whilst every attempt has been made to cover a wide range of activities in this guide it is recognised that it cannot cover all eventualities. Staff are expected to make judgements about their actions and behaviour to secure the best interests and safety of the Children in their care. All actions and behaviours should be guided by the principal that the safety and welfare of children is paramount

Responding to disclosures, safeguarding incidents and concerns

Indications that a Child may be being abused can be difficult to recognise. Some signs and indicators may be explained by something plausible, for example, bereavement, sudden absence of a parent or carer, adolescence or accidental injury. The presence of one or more signs and indicators should not be taken as proof that abuse has or is taking place, however Staff do not need evidence to report a concern. A person may be at increased risk of harm if you fail to report your concerns. No single person can have a full picture of a Child's circumstances. Staff should never think that their concerns are not significant enough to act on. Staff should discuss their concerns with the Head of Safeguarding. All disclosures, incidents and allegations must be taken seriously and responded to in line with the Club Safeguarding Policy and training. This includes allegations about non-recent abuse and allegations made against deceased individuals. Staff should contact any member of the Safeguarding Team please see the included flow chart. Anyone can contact emergency services or make a referral directly to statutory agencies, particularly if they are concerned about a Child's immediate safety, if they are having difficulty contacting a member of the Safeguarding Teams or if they are concerned that a disclosure or information about a safeguarding concern has not been acted upon appropriately. WBA will fully support anyone who in good faith reports their concerns about the safety and welfare of a child. WBA Whistle Blowing policy is available on request and via the Club website.



Safeguarding Procedures for Staff, Volunteers, External Parties and Subcontractors

What is a disclosure?

A disclosure is the process by which a person starts to share that they have been abused with others. This can happen in a variety of ways including:

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

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

Listen:

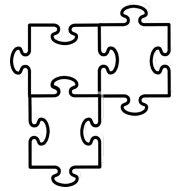
- Staff should give their full attention to the person disclosing and should keep their body language open and encouraging.
- Staff should respect pauses and not interrupt the person disclosing.
- Staff should limit any questioning to the minimum necessary to seek clarification only. When seeking clarification,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

Reassure:

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

Views and wishes:

Staff should engage the person disclosing as far as possible about how best to respond to their safeguarding situation. Staff are expected to act in the best interests of the child. Seek advice from any member of the Safeguarding Groups, the Head of Safeguarding Chris Elliot or Head of Academy Player Care and Safeguarding Officer Simon Crockett. Non-urgent matters can be discussed confidentially on safeguarding@wbafc.co.uk



Safeguarding Procedures for Staff, Volunteers, External Parties and Subcontractors

Safety:

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

Take action:

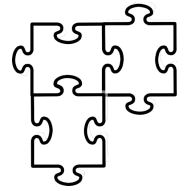
Staff should explain to the person disclosing what action they will be taking and that they will support them through the process. There may be circumstances where it is not appropriate to explain the actions that will be taken, for example, a child's age and understanding or if doing so would place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

Record:

Good record keeping is essential safeguarding practice. It is vital that Staff make a written record as soon as possible after the person has disclosed, their immediate needs have been met and the appropriate referrals have been made. Staff should contact the Safeguarding Team if in doubt about recording requirements. All safeguarding concerns and low levels concerns will be recored on the My Concern system.

Staff must never:

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



Safeguarding Procedures for Staff, Volunteers, External Parties and Subcontractors

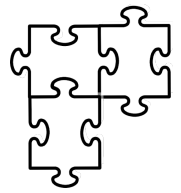
Recording information:

All incidents, allegations and disclosures must be recorded on My Concern. If Staff are unable to access My Concern, then an initial written record should be made prior to its upload. This will include the following information:

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

Staff are expected to:

- Provide clear, concise and relevant information.
- Record information in an objective and professional manner.
- Record factual information rather than assumption of what you have witnessed or been told.
- Record actual words and language. Don't rephrase what you have been told or leave things like insults or intimate vocabulary out.
- Record observations, for example, a description of visible bruising or injuries. Never ask someone to remove or adjust their clothing to observe any bruises, marks or injuries. If more information is recalled at a later date, this should be added as an addendum. The original record must not be changed



Safeguarding Procedures for Staff, Volunteers, External Parties and Subcontractors

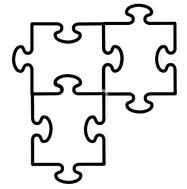
Confidentiality and Storing of Information

There is always tension and caution around issues of confidentiality. The advice for all staff at West Bromwich Albion Football Club is that no guarantee of confidentiality can be given to a child at risk. All staff have a professional responsibility to share information with other agencies to safeguard a child. There are actions which staff have to and are obliged to take once we are aware of a problem. Undertakings of confidentiality should not be given either to the person making the allegations or to the person being interviewed. A matter is confidential on a need to know basis and nobody should have any reservations about referring a safeguarding children issue any member of the Club safeguarding team. The key issue is that the welfare of the child is protected.

WBA uses an electronic case management system to store safeguarding records and concerns. The storage of this information and relevant security measures will be outlined in the Data Protection and GDPR policy of the relevant organisation. In order to attain a copy of the clubs data retention document which includes information as to how, why and for how long safeguarding records are retained, please contact the Data Protection Lead. GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe.

Low Level Concerns

It has been recognised by the club there is a need to manage issues that fall under the umbrella of safeguarding yet which are of a minor nature. These matters are classified as 'Low Level Concerns'. Handling such concerns appropriately and proportionately will strengthen confidence of staff and volunteers in the Club. Where Low Level concerns are shared with a designated safeguarding member of staff in accordance with the Clubs' safeguarding policy, these must be recorded as per the normal process for managing Safeguarding issues. What is a Low Level Concern? A low-level concern for this purpose is any concern, no matter how small and even if no more than a 'nagging doubt', that an person may have acted in a manner inconsistent with the Club's Code of Conduct or simply – even if not linked to a particular act or omission – a sense of unease as to their behaviour. Low Level Concerns where no emergency actions are required, should be managed internally and recorded within the My Concern electronic Safeguarding management system and entitled 'Low Level Concern' in the 'Concern Summary' section. Low Level Concerns do not in any way override or replace the Clubs 'Whistle Blowing Policy' but compliment and work alongside that process.



Safeguarding Procedures for Staff, Volunteers, External Parties and Subcontractors

Non Recent Abuse

Non-recent abuse (also known as historical abuse) is an allegation of neglect, physical, sexual or emotional abuse made by or on behalf of someone who is now 18 years old or over, relating to an incident which took place when the alleged victim was under 18 years old. Allegations of child abuse are sometimes made by adults and children many years after the abuse has occurred. There are many reasons for an allegation not being made at the time, including fear of reprisals, the degree of control exercised by the abuser, and shame or fear that the allegation may not be believed. Reports of non-recent concerns or allegations of abuse may be complex, as the alleged victims may no longer be living in the same situation where the abuse occurred and/or the whereabouts of the alleged respondent may be unknown. However, such cases should be responded to in the same way as any other safeguarding concern or allegation. That is because:

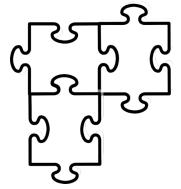
- There is a likelihood that a person who abused a child/children in the past will have continued and may still be doing so;
- Criminal prosecutions can still take place, despite the fact that the allegations are non-recent in nature and may have taken place many years ago

Communication and media protocols

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

Support for Staff

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

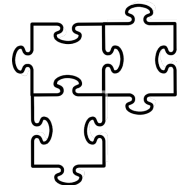


Safeguarding Procedures for Staff, Volunteers, External Parties and Subcontractors

Identifying poor practice

Incidents of poor practice occur when the needs of children and young people are not afforded the necessary priority, so that their welfare is compromised. For example:

- When insufficient care is taken to avoid injuries (e.g. by excessive training or inappropriate training for the age, maturity, experience and ability of players)
- Giving continued and unnecessary preferential treatment to individuals and regularly or unfairly rejecting others (e.g. singling out and only focusing on the talented players and failing to involve the full squad)
- Placing children or young people in potentially compromising and uncomfortable situations with adults (e.g. changing in a 1:1 situation with a young referee)
- Allowing abusive or concerning practices to go unreported (e.g. a coach who ridicules and criticises players who make a mistake during a match)
- Ignoring health and safety guidelines (e.g. allowing young players to set up goal posts unsupervised by adults)
- The assessment about whether an incident is one of child abuse or poor practice (or hazing) may not be able to be made at the point of referral, but only after the collation of relevant information. There is evidence which indicates that some children and young people have experienced what may be referred to as 'initiations' more commonly now referred to as 'hazing' into a sports club or team; often a historical practice which may have been started with good intentions but can result in oppressive, intimidating and abusive behaviour. Hazing; is any action or situation, with or without the consent of the children and young people, which recklessly, intentionally, or unintentionally endangers the mental, physical, or emotional wellbeing of a child or young person. Reported concerns of hazing will be taken seriously and appropriate actions taken.
- The majority of poor practice concerns can be dealt with by the club or alternatively with support and guidance from the EFL Safeguarding Team and/or FA
- All child abuse will be dealt with by The FA (in conjunction with the statutory agencies) and with the support of the EFL.

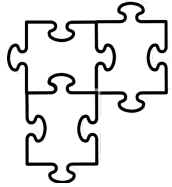


Safeguarding Procedures for Staff, Volunteers, External Parties and Subcontractors

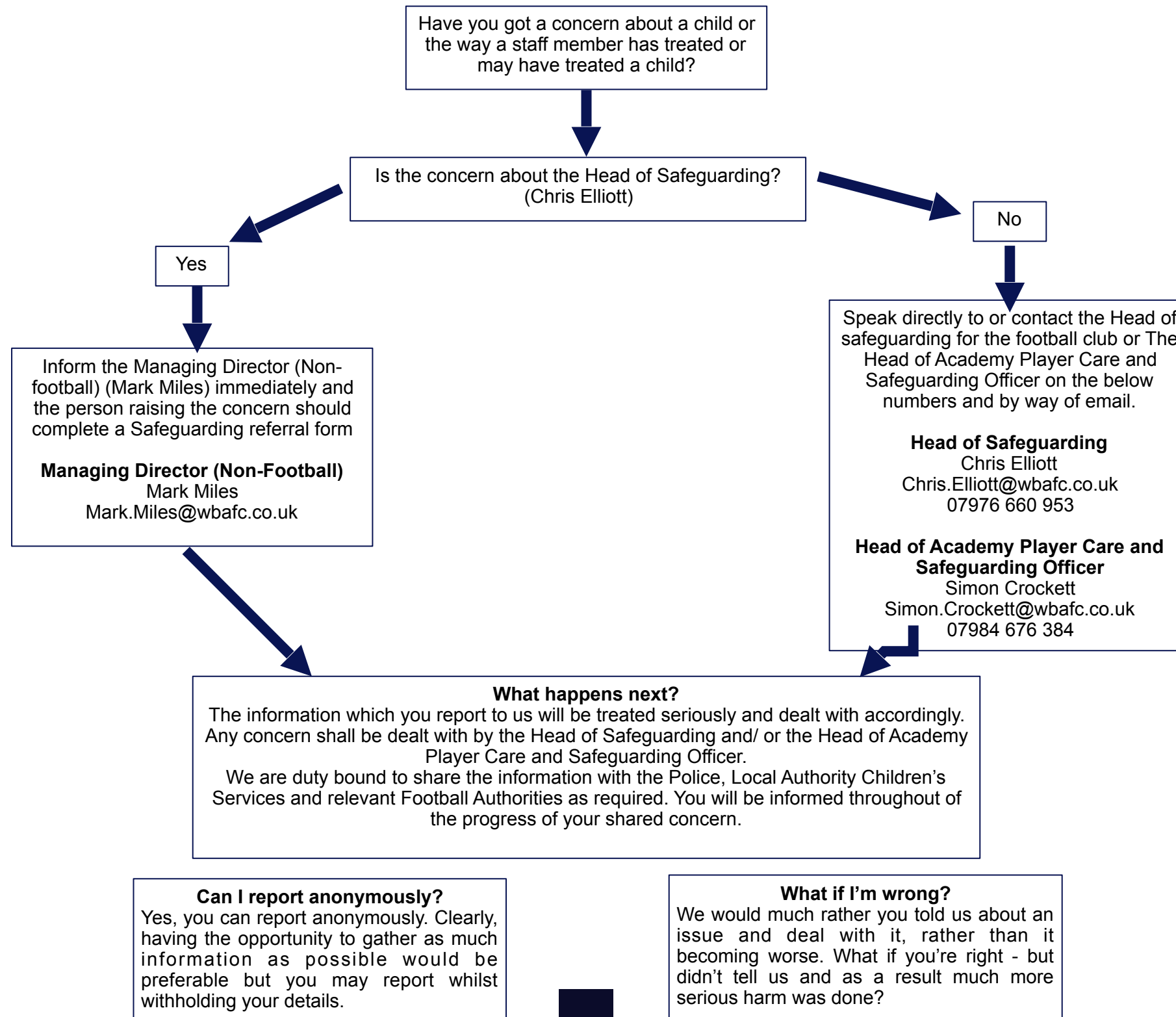
Thresholds for Referrals to Statutory Authorities

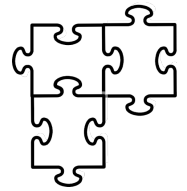
WBA may receive information regarding the welfare of a child or young person who is involved in football, yet the concern itself does not relate to someone within the game. In these circumstances (e.g. the concern relates to the child's home or a social setting other than football) The clubs individual safeguarding policy and procedures should be implemented:

- Refer the concerns directly to local Children's Social Care or to the local Police. These agencies will advise the Club whether a formal referral to Children's Social Care is necessary and what further action the Club might need to be taken.



How to Report a Concern





Allegations Against Staff

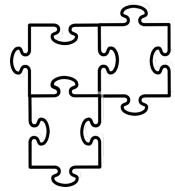
West Bromwich Albion Football Club will always take concerns and allegations about employees and volunteers seriously and will respond in a way that places the protection and needs of children and young people and at risk first. The procedure will always be followed in respect of all cases where it is alleged that an employee or a volunteer has:

Behaved in a way that has, or may have, harmed a child and young person at risk. Possibly committed a criminal offence against, or related to, a child and young person at risk.

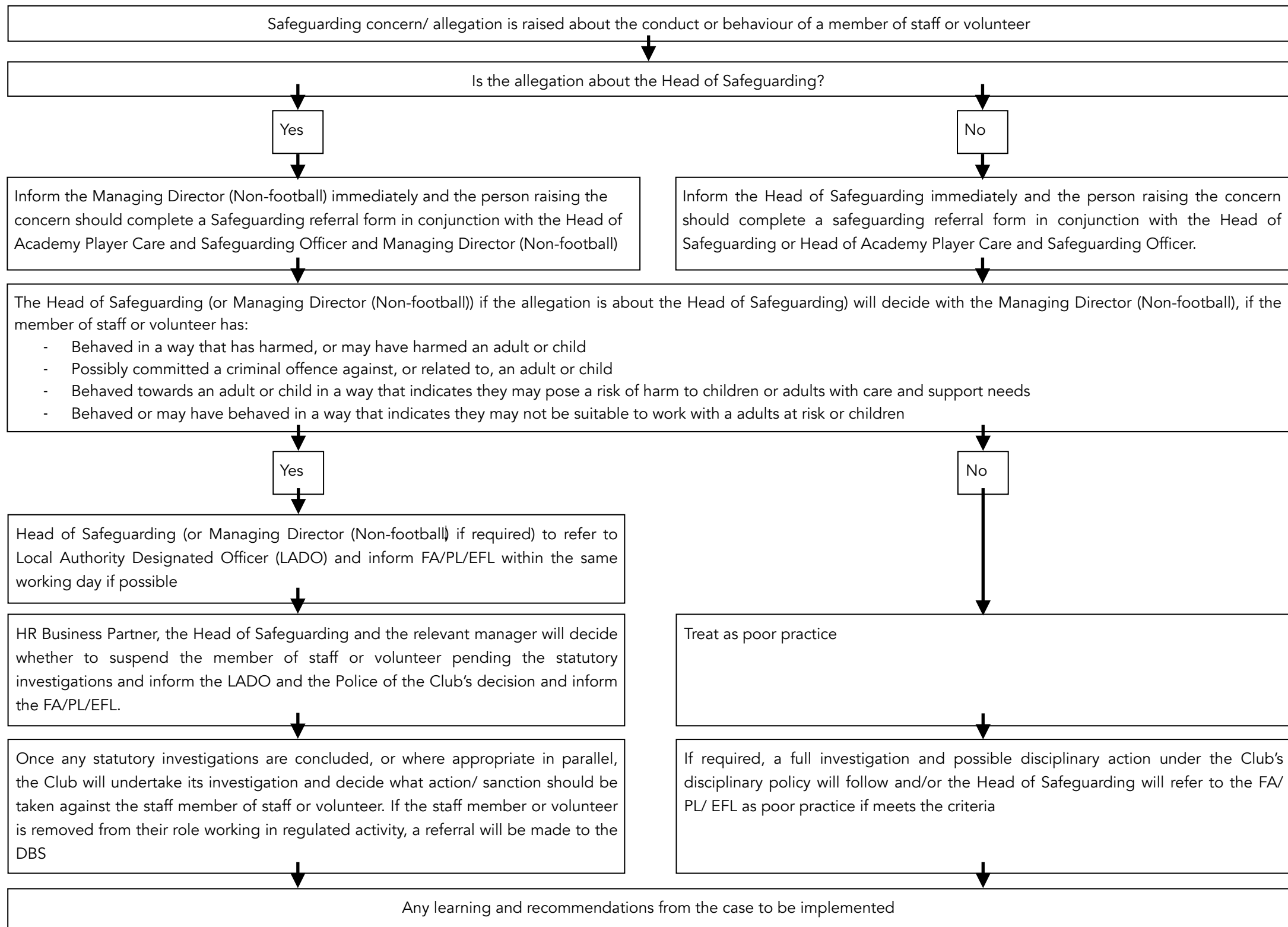
Behaved in a way that indicates s/he is unsuitable to work with children and young people at risk. This can include behaviour in their personal life that raises safeguarding concerns.

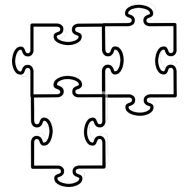
The Club will always inform the police when information is received that indicates that the criminal law has been, or may have been, broken. Additionally, the Club will inform other Statutory and Regulatory Authorities/Agencies when it is required to do so or when the circumstances regarding the allegations are such that the Authorities/Agencies should be so notified. The Local Authority Designated Officer (LADO) will be contacted for any concerns regarding a staff member employed/volunteers in a position of trust or a relationship of trust. This applies to all local authorities that the club engage with.

The Club will work with openness and transparency with all Authorities / Agencies. The Head of Safeguarding alongside the HR Business Manager will have full oversight of any allegations against employees or volunteers who work with children and young people at risk. The Club's Safeguarding Lead and where applicable the Community Director, will also be informed at each stage of any allegation and or concern. The Head of Safeguarding will hold management responsibility and the HR's Business Partner will hold responsibility for advising on all aspects of the HR processes.



Allegations Against Staff





Use of Photography and Imagery

Before taking images of children, parental consent must be sought in writing, at the start of the season or prior to the event. Parents/responsible person are responsible for informing the Club of any change of circumstances within the season which may affect consent.

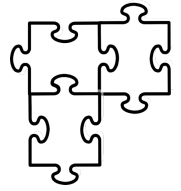
Parents/responsible person will be informed of how the image will be used. The Club will not allow an image to be used for something other than that for which it was initially agreed. All children featured in Club publications will be appropriately dressed. If possible, the image will focus on the activity taking place and not a specific child. Where appropriate, images will represent the broad range of people participating safely in the event.

Club photographers will in any case will be personally responsible for keeping up to date with the latest guidelines on the 'Use of Images' policies from The FA, EFL, PL. Club identification will be worn at all times.

Children who are the subject of a court order will not have their images published in any Club document.
No images of children featured in Club publications will be accompanied with personal details such as their home address.

Recordings of children for the purposes of legitimate coaching aids will only be filmed by Club officials and stored safely and securely at the Club's premises. Mobile phone cameras are not to be used in changing rooms.

The Club will not put young player profiles with images and personal information on its website or other circulations. Separate ground regulations apply for match days at the Hawthorns. Those details are on tickets and displayed in and outside the stadium. Any instances of inappropriate images in football should be reported to a Head of Safeguarding.

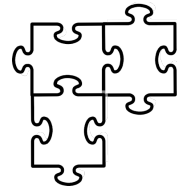


Late Collection/ Non-Collection of Children

There are a number of reasons why a child may remain uncollected at the end of the day. Some of the possible causes may be a delayed parent, traffic or confusion about finishing times. Staff must respond sensitively and consistently to ensure the safety and welfare of such children and young people at risk. Staff should ensure that full contact & emergency information is collected for each young person in advance of the session starting. For those people that attend weekly sessions contact and emergency information will be updated annually. Several contact alternatives are required. Make sure families are aware of this procedure and understand the process that will be followed if children or young people at risk are not collected on time.

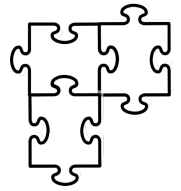
If a child and young person at risk is not collected within 15 minutes after the end of the session, the following steps should be taken:

1. Any child and young person at risk should be taken to the main reception/entrance at the Club, Academy office or other venue if off site. Their name(s) should be recorded and a member of staff assigned to lead on the late collection
2. A check should be made for information about changes to collection routines. This should be with the event lead, coach, leader and receptionist.
3. Reasonable attempts should be made to contact:
 - Parents / carers
 - Any other adults authorised to collect the child, young person or vulnerable adult
 - Transport providers where necessary registration documents or a person authorised by a parent / carer.



Late Collection/ Non-Collection of Children

4. The child and young person at risk should only leave the premises with the person(s) named on their registration documents or a person authorised by a parent / carer.
5. If no-one can be contacted to collect the child one hour after the event has finished, Social Care (0800 1313 126) and the Police (101) will be contacted.
6. The child and young person at risk should stay at the setting in the care of **two DBS checked** staff members until safely collected by the mother, father, a nominated carer, social worker or police officer.
7. Under no circumstances should staff attempt to look for the parents / carers.
8. Staff should never take the child and young person at risk home with them.
9. Collection of children by staff should only take place in circumstances where full consent has been obtained from the parent / carer, the relevant school. All staff will have an enhanced DBS and appropriate insurance.
10. A full written report of the incident and outcome must be recorded on the safeguarding incident form and passed to the any member of the safeguarding team.



Supervision Ratios and Lone Working and One-to-One

SUPERVISION RATIOS

Staff and Partners are expected to provide appropriate supervision of the Children at Risk in their care at all times. The level of supervision required will vary between activities. Ratios for each Activity should be determined by taking the following into consideration:

The age, needs, abilities and behaviour of the Children and Young People at Risk participating.

The competence and experience of Staff and Partners involved. The nature and duration of the Activity.

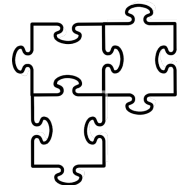
Risk assessments and/or intelligence identifying potential behavioural or other issues and risks.

Staff and Partners must work with West Bromwich Albion Football Club Safeguarding Team when planning activities to ensure that appropriate ratios and supervision arrangements are carefully considered. This includes any activity at any of our venues including The Hawthorns, The academy, The training ground, The Sports Hall or any, The Albion Foundation event (TAF)

LONE WORKING AND ONE-TO-ONE

Staff and Partners responsibilities:

- Work in an open and transparent way and avoid conduct which could raise concern or place Children at Risk of harm.
- Under no circumstances should Staff and Partners visit Children at Risk in their homes outside agreed work arrangements. Nor should they invite Children at Risk to their own home or to that of a family member, colleague, or friend.
- Ensure that contact by whatever means and meetings with Children at Risk outside agreed working arrangements never take place without the knowledge and agreement of West Bromwich Albion Football Club FC.
- Ensure that if you are using communication Apps, the child is of the appropriate age. All communications shall be in groups rather than personal messages.
- Always ensure parental or appropriate parent/guardian consent.



Legislation and Key Safeguarding Contacts

LEGISLATION

Children Act 1989.

Children Act 2004.

Crime and Disorder Act 1998. GDPR Data Protection Act 1998. FA Safeguarding Children Rules. FA Respect Codes of Conduct. Human Rights Act 1998.

Police Act 1997.

Premier League Guidance for Safer Working Practice. Premier League Rules.

Protection of Children Act 1999. Protection of Freedoms Act 2012. Rehabilitation of Offenders Act 1974. Safeguarding Vulnerable Groups Act 2006. Sex Offenders Act 1997.

Sexual Offences Act 2003.

Youth Evidence & Crime Evidence Act 1999. Working Together 2018

Keeping Children Safe in Education 2021 EFL and PL Safeguarding Standards

KEY SAFEGUARDING CONTACTS

Chris Elliott Head of Safeguarding West Bromwich Albion Football Club FC – 07976660953

Safeguarding@wbafc.co.uk

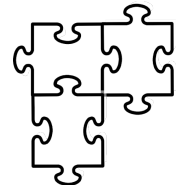
Police - 101 or 999 in an emergency

West Midlands Police – Child Abuse Investigation Unit – 0121 626 5000 FA NSPCC – 0808 800 5000

Child Line – 0800 1111

Samaritans 116 123

CEOP Child Exploitation On-line Protection Agency 0370 496 7622



Other Related Documents, Procedures And Guidance

Adults at Risk Safeguarding Policy
 Changing Room & Shower Guidance
 Complaints Procedure DBS Policy and Procedure Disciplinary Procedures
 Employment of U18's
 Equality and Diversity Guidance for Safer Working Practice
 Health & Safety
 Match Day procedures
 Mental Health and Wellbeing Policy WBA
 Photography and Filming Policy
 Preventing Radicalisation and Extremism
 Safer Recruitment
 Social Media Policy
 Substitute Accommodation
 Supervision of Children and Young People Transport Policy
 Trips and Tours
 Whistleblowing



WEST BROMWICH ALBION FOOTBALL CLUB

This document will be reviewed annually by the Senior Safeguarding Group