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*SAFE*

*'KEEPING OUR FAMILY SAFE'*

SAFEGUARDING CHILDREN POLICY



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## West Bromwich Albion Football Club / Board Statement

**Mark Miles** / Managing Director

I along with everyone connected with West Bromwich Albion Football Club is absolutely committed to safeguarding and promoting the welfare of every child, young person and adult who are part of the 'Albion Family'.

We are driven to create, maintain and develop safe environments for our Albion Family, this is reflected within our Safeguarding Strategies and Policies.

## 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, and positive environment for all. We are committed to ensuring that our staff and volunteers are appropriate and suitable to work with vulnerable groups.

We will provide continuous development opportunities, guidance, support and training to ensure that safeguarding and promoting the welfare of children and young people is a priority and that staff across the organisation take time to listen and to respond positively to the needs of all we engage with.



## SAFEGUARDING CONTACTS

WBA FC Safeguarding Team	Safeguarding@wbafc.co.uk
Lisa Reynolds, Head of Safeguarding	Email: Lisa.Reynolds@wbafc.co.uk Mobile: 07971 632104
Andy Wheeler, Safeguarding Manager (Academy)	Email: Andy.Wheeler@wbafc.co.uk Mobile: 07816 126120
Dave Webb, Safeguarding Manager (Foundation)	Email: dave.webb@albionfoundation.co.uk Mobile: 07393 019638
Mark Miles, Board Safeguarding Lead	Email: Mark.Miles@wbafc.co.uk

### Sandwell Multi-Agency Safeguarding Hub

Contact Details / During Working Hours  
(Monday -Thursday 8am-5:30pm and Friday: 8:00am – 5pm) Telephone: 0121 569 3100  
Evenings and Weekends (including Bank Holidays) Telephone: 0121 569 3100  
If a child or young person in immediate danger, then call the Police on 999.

 **NSPCC** FA NSPCC Child Protection Helpline: 0808 800 5000

 **Childline**: 0800 1111

 **Police**: 101 or 999 in an emergency

 **West Midlands Police Child Abuse Investigation Unit**: 0121 626 5000

 **Samaritans**: 116 123

 **Child Exploitation On-line Protection (CEOP) Agency**: 0370 496 7622

## POLICY STATEMENT

Our Mission at West Bromwich Albion Football Club is absolutely committed to safeguarding and promoting the welfare of every child, young person and adult who are part of the 'Albion Family'.

We are driven to create, maintain and develop safe environments for our Albion Family, this is reflected within our Safeguarding Strategies and Policies.

In applying this policy and procedures the Club will seek to promote and embed an environment that enables all children and adults to safely participate and enjoy all club activities. This equally applies to the welfare and confidence of those working with and responsible for the activities.

This policy applies to the whole of the football club and is mandatory for all those working with children and young people.

## KEY SAFEGUARDING PRINCIPLES

- The welfare of children is paramount.
- Safeguarding is everyone's responsibility.
- All participants, regardless of age, ability or disability, race, religion and beliefs, ethnic origin, sexual orientation and gender identity have the right to be protected from abuse and poor practice and to participate in an enjoyable and safe environment.
- The rights, dignity and worth of all participants will always be respected.
- We are committed to ensuring that our staff have the confidence to implement this policy and procedures to ensure that all welfare and safeguarding concerns and allegations of poor practice or abuse are taken seriously and responded to positively, consistently and appropriately. Support will be provided for anyone who raises concerns in good faith.
- We will seek to ensure that our workforce is alert to factors which potentially increase vulnerability and risk and to indicators of concern, harm and/or abuse. We will always seek to work in partnership with other agencies, organisations, children, parents, guardians and carers to promote the welfare, health and enjoyment of young people involved in our activities.
- The interest of those who work or volunteer with participants with our activities will be protected and supported through the provision of practice guidance, support and safeguarding training appropriate to their roles and responsibilities.
- Personal information will be treated in strict confidence in accordance with UK legislation, which requires that information is shared with the Police, Adult/Children's Social Care and or other statutory agencies where there are concerns that a child or adult is at risk of harm or it is believed that a crime has been committed.
- We are committed to creating and maintaining safe environments for everybody and that our safeguarding policies and Strategic Safeguarding Plan reflects our commitment to this.



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# LEGISLATION AND GUIDANCE

We take our legal and moral duty of care very seriously. The categories and definitions of abuse set out in statutory guidance can be seen in Appendix B. As a club, we encourage anyone who is worried - about attitudes or behaviour towards them or others, who feels vulnerable (inside or outside of our activities) or who needs support - to share those concerns and to be confident that our staff and our safeguarding team will listen carefully and take appropriate action, including providing support.

A full list of WBA FC relevant documents, guidance and policies can be found in Appendix A.

The primary UK legislation, statutory guidance and duties underpinning the policy include:

- Children Act 1989
- Children Act 2004
- Care Act 2014
- Crime and Disorder Act 1998
- English Football League Rules
- English Football League Safeguarding Standards
- FA Safeguarding Children Rules
- FA Respect Codes of Conduct
- GDPR Data Protection Act 1998
- Human Rights Act 1998
- Police Act 1997
- Premier League Guidance for Safer Working Practice
- Premier League Rules
- Premier League Safeguarding Standards
- Prevent Duty (Home Office 2015) (updated April 2021)
- 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 to Safeguard Children (DfE 2018)
- Keeping Children Safe in Education (DfE annually )
- Care and Support Statutory Guidance (updated 21 April 2021)

The Club will respond to concerns related to the prevention and management of extremism and radicalisation in accordance with this policy and in line with the UK Government's Prevent Duty. We are also committed to achieving and embedding the English Football League (EFL) and Premier League (PL) Safeguarding Standards as well as the Football Association (FA) Safeguarding Regulations.

# 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 PL and EFL has produced a guide entitled "Safer Working Practice" a copy of which has been received by all staff and can be requested from our Safeguarding Team. 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 our children in their care and to seek the help and support of the Safeguarding Team. All actions and behaviours should be guided by the principal that the safety and welfare of children is paramount. We recognise the emotional impact upon staff when concerns arise and our Safeguarding Team are also available to ensure that appropriate support is extended to anyone involved in the management of concerns.

## 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 the impact of bereavement, sudden absence of a parent or carer, adolescence or accidental injury, for example. 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 our Safeguarding Team who will follow 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 our Safeguarding Teams or if they are concerned that a disclosure or information about a safeguarding concern has not been acted upon appropriately.

WBA FC will fully support anyone who in good faith reports their concerns about the safety and welfare of a child. WBA FC Whistle Blowing policy is available through the link in Appendix A and via the Club website.



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# 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 the Head of Safeguarding Lisa Reynolds or Safeguarding Manager (Academy), Andy Wheeler. Non-urgent matters can be shared confidentially on [safeguarding@wbafc.co.uk](mailto:safeguarding@wbafc.co.uk)

### Safety:

Staff should ensure that the immediate needs of the person who is felt to be vulnerable or at risk are responded to and their safety and protection should be the prioritised. This may involve contacting emergency services and/or statutory agencies. The Head of Safeguarding must be immediately notified of all such action.

### Take action:

Staff should explain what action they will be taking to the person who is sharing concerns or who is felt to be vulnerable or at risk and assure them that they will be supported throughout the process. There may be circumstances where it is not appropriate to explain the actions that will be taken, for example, if it is not appropriate to a child's age and understanding or if doing so would place the person at greater risk of harm. Staff should share any concerns without delay with a member of our Safeguarding Team. Where it is suspected that a crime may have 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 a written record is made 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 Head of Safeguarding or Safeguarding Manager (Academy) for support with safeguarding concerns, irrespective of whether they are high or seemingly low-level concerns. All staff will have user access and appropriate training for the MyConcern electronic case management system and all concerns must be recorded on this 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



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# SAFEGUARDING PROCEDURES FOR STAFF, VOLUNTEERS, EXTERNAL PARTIES AND SUBCONTRACTORS

## Recording information:

All incidents, allegations and disclosures must be recorded on MyConcern. If Staff are unable to access MyConcern, then an online form 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) witness(es) 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 professional opinions and assessments separately to the factual information.
- Record a person's actual words and language using direct quotes where possible. Don't rephrase what you have been told or leave things like potentially offensive language, 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.

## Confidentiality and Storing of Information

There is often some anxiety and caution around issues of confidentiality, but failure to share information has been shown to contribute to be a significant factor in contributing to poor outcomes for those who are in need of support and protection. The advice for all staff at WBA FC is that no guarantee of confidentiality should be given. All staff have a professional responsibility to share information with our Safeguarding Team and with other agencies where a child is felt to be at risk of significant harm or where there are concerns about potential abuse.

Reassurance should be given that confidentiality will be tightly maintained and sensitive information will only be shared with our Safeguarding Team and with others on a need-to-know basis. Nobody should have any reservations about sharing a safeguarding children concern with any member of our Safeguarding Team. It is never an option to do nothing.

WBA FC uses a specialist electronic safeguarding case management system to store information relating to safeguarding records and concerns. The storage of this information and relevant security measures are fully compliant with UK Data Protection legislation and GDPR. In order to attain a copy of the WBA FC's data retention document which includes information as to how, why and for how long safeguarding records are retained, please contact WBA FC's Data Protection Officer via the following e mail address; data.protection@wbafc.co.uk. GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of safeguarding and protecting children and young people.

## Low-Level Concerns

It has been recognised by the club there is a need to manage and collate issues that fall under the umbrella of safeguarding, yet which may appear to be relatively minor in nature. It may be something that is observed, heard or communicated that creates a sense of discomfort, anxiety or concern or something that intuitively just doesn't 'feel right'. This may be behaviour, language, attitudes or something that appears to have had a negative impact (even if unintended). It is important not to wait until you are sure, but to share concerns and seek advice/support at the earliest opportunity. These matters are classified as 'Low-Level Concerns'.

Recording these concerns enables more informed pictures of concern to be built over time around areas of practice, individuals or development and training needs for staff. By managing low level concerns through early interventions, conversations and support, the Club can be far more proactive, confident, and positive in its approach to safeguarding and supporting staff, participants and their families. Low-Level concerns must be recorded on MyConcern as per the normal process for managing Safeguarding issues. Where Low-Level Concerns relate to a staff or volunteer, this policy does not in any way override or replace the Clubs 'Whistle Blowing Policy' but compliments and works alongside that process.



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# 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(ren) 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.

## 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 PL and EFL Safeguarding Teams 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 PL and EFL.

## Thresholds for Referrals to Statutory Authorities

WBA FC 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.



# ALLEGATIONS AGAINST STAFF

WBA FC 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. Recent changes in the Law across England and Wales mean that our coaching workforce (staff and volunteers) who work with children, young people and vulnerable groups, and many of our leadership roles, now fall under the legal definition of Positions of Trust, just like teachers and others working in Regulated roles and settings. We will hold them to the highest standards of behaviour and practice. 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, or.
- 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.

Allegations of non-recent safeguarding concerns/historical abuse should be responded in the same way as current concerns.

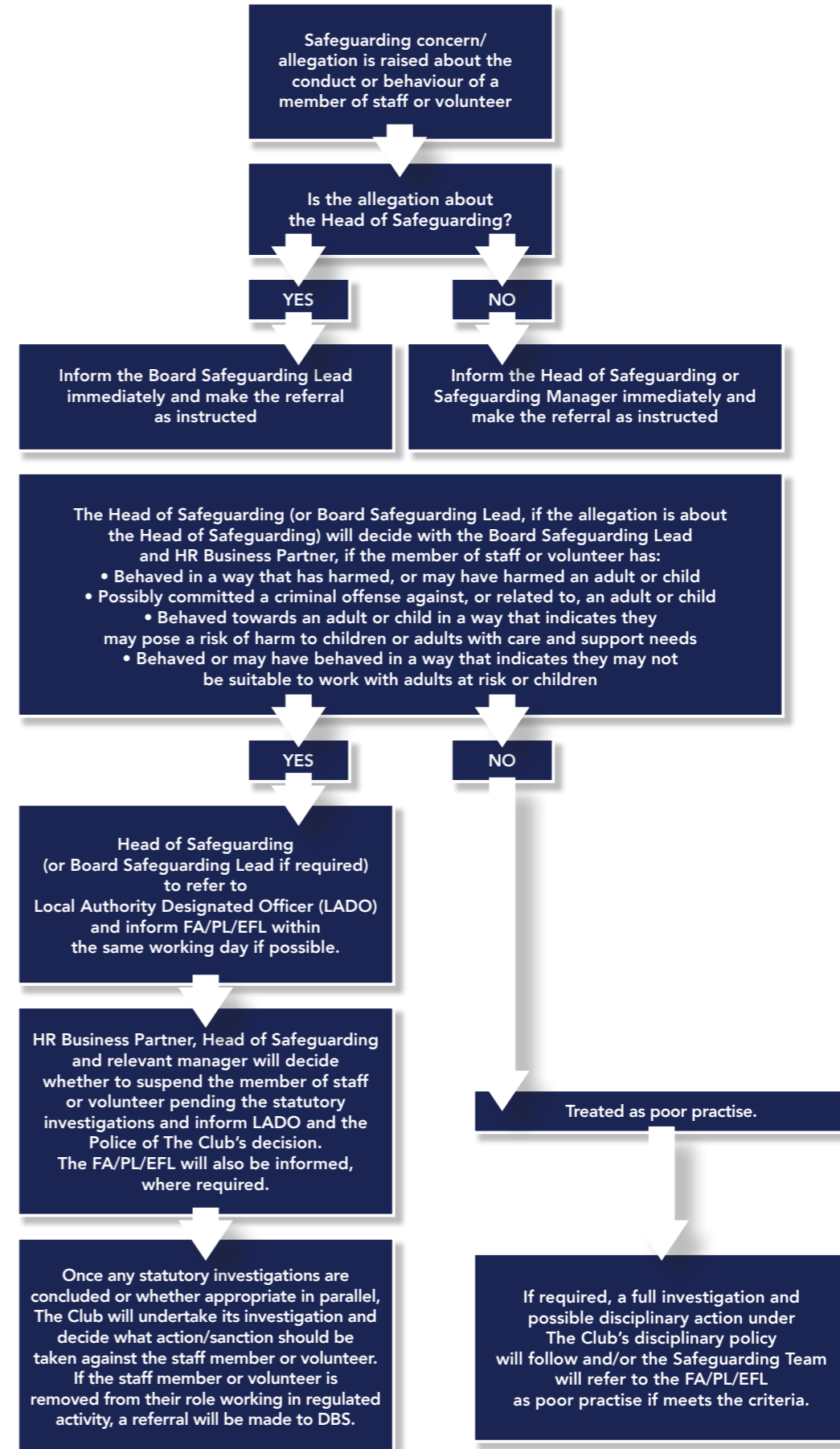
The Club will always inform the police when information is received that indicates that the criminal law has been, or may have been, broken. Additionally, the Club will inform other Statutory and Regulatory Authorities/Agencies when it is required to do so or when the circumstances regarding the allegations 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.

## Thresholds for Referrals to Statutory Authorities

WBA FC 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.





# 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. Our staff will 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 an appropriate 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.
- 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, Sandwell Children's Trust (0121 569 3100) 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 and a risk assessment has been formally recorded and agreed with a member of the Safeguarding Team. Please see link to Transport Policy in Appendix A. All staff working in Regulated activities 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 on the MyConcern safeguarding records system.



# SUPERVISION RATIOS, LONE WORKING AND ONE-TO-ONE

## SUPERVISION RATIOS

Staff and Partners are expected to provide appropriate supervision of the Children 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 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 support needs and risks.
- Staff and Partners must work with the 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 Albion Foundation (TAF) event.

## 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 in their homes outside agreed work arrangements. Nor should they invite Children to their own home or to that of a family member, colleague, or friend.
- Ensure that contact by whatever means and meetings with Children outside agreed working arrangements never take place without the knowledge and agreement of WBA 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.
- Staff should never befriend or communicate with children and young people who are involved in our activities through social media networks (Facebook, Instagram, TikTok, private messaging etc) unless this has been risk assessed and agreed with our Safeguarding Team.

## APPENDICES

Appendix A – Relevant Documents, Guidance and Policies

Appendix B – Types of Abuse



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## APPENDIX A - RELEVANT DOCUMENTS, GUIDANCE AND POLICIES

- 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
- Photography and Filming Policy
- Preventing Radicalisation and Extremism
- Safer Recruitment
- Supervision of Children and Young People
- Transport Policy
- Trips and Tours
- Whistleblowing
- Safeguarding Adults Policy
- Use of Video and Photos Policy
- E-Safety Policy
- Low Level Concern Policy
- Missing Child Procedure
- Registration and Collection of Children Policy
- Responding to Concerns Policy
- Managing Allegations Against Staff Policy
- U18s in Senior Squads
- Hosted Players Accommodation

## APPENDIX B - 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.

### 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.



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# APPENDIX B - TYPES OF ABUSE CONTINUED

## 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.

## 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.

## 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 practice 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.

## 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.



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# APPENDIX B - TYPES OF ABUSE CONTINUED

## 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.

## 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.

## Child on Child 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.

## 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.



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# APPENDIX B - TYPES OF ABUSE CONTINUED

## 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 coordinated 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.

## 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.



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