



# Brentford Football Club & Brentford FC Community Sports Trust Safeguarding Children and Adults Policy

## Foreword

This Safeguarding Policy (Policy) reflects the joint ethos of the Club and the Trust. Both Boards have resolved to endorse this document in accordance with their articles and expect all staff in the workforce community at Brentford to share the commitment to safeguard and promote the welfare of children, young people and adults at risk.

The Club and Trust's Safeguarding Children Policy and Safeguarding Adults Policy are now integrated to ensure the safety and protection of vulnerable groups.

## Application of Policy

This Policy applies to Brentford FC Limited which includes Brentford FC's first team and Academy (including the B team) and the Brentford FC Women's first and B teams (together, in this document, 'the Club' or "Brentford Football Club" or "Brentford") and to Brentford FC Community Sports Trust (a registered charity, in this document 'the Trust').

Any references to 'the Club' are therefore intended to apply to the Club and to the Trust.

## List of Contents

Safeguarding Statement	3
Introduction	3
- Scope	4
What is Safeguarding?	4
Governance	5
- BFC Safeguarding Governance Structure	6
- Trust Safeguarding Governance Structure	7
Safeguarding Roles and Responsibilities	8
- BFC Safeguarding Board	8
- BFC Operational Management Group/BFCCST Safeguarding Subgroup	8
- Head of Safeguarding Operational Hub	9
- Head of Safeguarding	9
- Safeguarding Manager	10
- Designated Safeguarding Officer	11
- Assistant Designated Safeguarding Officer	11
Learning and Development	12
Data Protection	12
- Confidentiality and Data Protection	12
- Storage of Information	12

Policy Owner – Natalie Craig	Policy date August 2023	Policy to be reviewed – August 2024
------------------------------	-------------------------	-------------------------------------



Recruitment	13
Professional Concerns	13
- Concerns that meet the threshold of harm	13
- Concerns and/or allegations that do not meet the harm threshold.	14
- Low Level concerns	14
Photography	15
Accommodation	16
Child Protection	17
Abuse	17
Reporting Concerns	17
Assessing Risk	18
Prevent Duty	18
- Prevent Risk Assessment and Action Plan	18
- Reporting extremist narratives and radicalisation concerns	19
Raising a Safeguarding Concern	19
Reporting Flowchart	20
Safeguarding Legislation and Guidance	21
Policy Review	21
Internal Contact Details	22
External Safeguarding Contacts	22
Appendix I – Definitions of Abuse	23
Appendix II – Safeguarding Issues	26
Appendix III – Notifying the Football Association and Premier League of allegations.	31

Policy Owner – Natalie Craig	Policy date August 2023	Policy to be reviewed – August 2024
------------------------------	-------------------------	-------------------------------------





## Safeguarding Statement

At Brentford Football Club and Community Sports Trust we want children, young people and adults at risk who engage with us to be safe and happy.

Everyone has the right to be safe. This applies to all environments, from home to school and in football. All adults who spend time with young people have a responsibility to make sure their well-being is prioritised. This means listening to people, making sure they are safe and taking action when required.

This is 'safeguarding'.

We will ensure people are treated with respect, that their voices are heard, and we will create a safe, welcoming environment which is inclusive, enjoyable, safe, respectful, and supportive.

The Club is committed to the safeguarding and welfare of everyone and requires all staff, volunteers and others associated with the Club to share and endorse this commitment. As part of this commitment, all staff are expected to undertake regular safeguarding and welfare-related training and to ensure the environments in which they work remain safe at all times. This includes ensuring best practices are adopted and incidents or concerns are proactively reported. At Brentford, safeguarding is considered everybody's responsibility.

### Introduction

Brentford Football Club acknowledges its responsibility to safeguard the welfare of everyone who engages with the Club. It is committed to working to provide a safe environment for all.

The key principles of Brentford's Safeguarding Policy are:

- The welfare of everyone in the care of or linked to the Club must always be the paramount consideration.
- Everyone has the right to be protected from abuse regardless of their age, gender, disability, race, sexual orientation, faith, or belief.
- All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately.
- A partnership approach to working with other organisations, children, young people, adults at risk and their parents/carers are essential to effective safeguarding.

We acknowledge that everyone who engages with the Club should be in an enjoyable and safe environment and be protected from poor practice and abuse. Brentford recognises this is the responsibility of all employees, workers, consultants, contractors, and volunteers who encounter people in Club-related activities.

Policy Owner – Natalie Craig	Policy date August 2023	Policy to be reviewed – August 2024
------------------------------	-------------------------	-------------------------------------





Brentford has a role to play in safeguarding everyone by protecting them from physical, sexual, or emotional harm and from neglect, exploitation, or bullying. Our staff will be made aware of the policy during their induction and must make themselves aware of this policy and accompanying procedures. This will be supplemented by training and additional guidance.

This document is compliant with legislation including, but not limited to, the Children Acts 1989 and 2004; The Care Act 2014, statutory guidance such as Working Together to Safeguard Children, Keeping Children Safe in Education and governing body rules and regulations including the Premier League safeguarding standards and rules, and FA (Football Association) Regulations. This document should be read in conjunction with related policies and procedures.

## Scope

This document will demonstrate our commitment to safeguarding, and our expectations for best practice. Brentford acknowledges its responsibility to safeguard the welfare of everyone who engages with the Club and Trust. It is committed to working to provide a safe environment for all.

This policy applies to all locations where Brentford Football Club and Brentford FC Community Sports Trust have an interest or control. Any third-party making use of spaces in which we have control must comply with this policy.

We will review our policies at the end of each season and sooner if there is a significant incident of concern. We are committed to being a reflective, learning organisation.

## What is Safeguarding?

Safeguarding is the action that an organisation takes to promote the welfare of children, young people, and adults at risk to protect them from harm including physical, emotional, sexual, and financial harm, and neglect. This includes making sure the appropriate policies, practices, and procedures are put in place.

Safeguarding and promoting the welfare of children, young people and adults at risk is defined as:

- protecting people from maltreatment
- preventing the impairment of people's mental and physical health or development
- ensuring children grow up in circumstances consistent with the provision of safe and effective care.
- taking action to enable everyone to have the best outcomes.

The term 'children' refers to everyone under the age of 18.

Policy Owner – Natalie Craig	Policy date August 2023	Policy to be reviewed – August 2024
------------------------------	-------------------------	-------------------------------------





The Care Act 2014 refers to adults at risk rather than vulnerable adults. This change allows further consideration of the harm adults can face. Adults can be at risk in a particular context such as an abusive relationship as well as because of health issues such as dementia. Adults can experience the same types of abuse and harm as children.

At Brentford, the referral process for concerns about children and adults is the same, the Safeguarding team can give advice about concerns relating to children and adults.

Safeguarding is a broad term that includes concerns relating to safety, welfare, and wellbeing that can range from minor worries to serious concerns. If we can address minor worries in a timely manner, we can ensure risks do not escalate.

Everyone at Brentford has a responsibility to promote people’s welfare, to keep them safe and to act in a manner that considers and protects them. Not everyone has contact with the public as part of their role, but we all have instances where we encounter people in Club and Trust spaces, whether in or around the stadium, at community events, in the office or at the Training Ground.

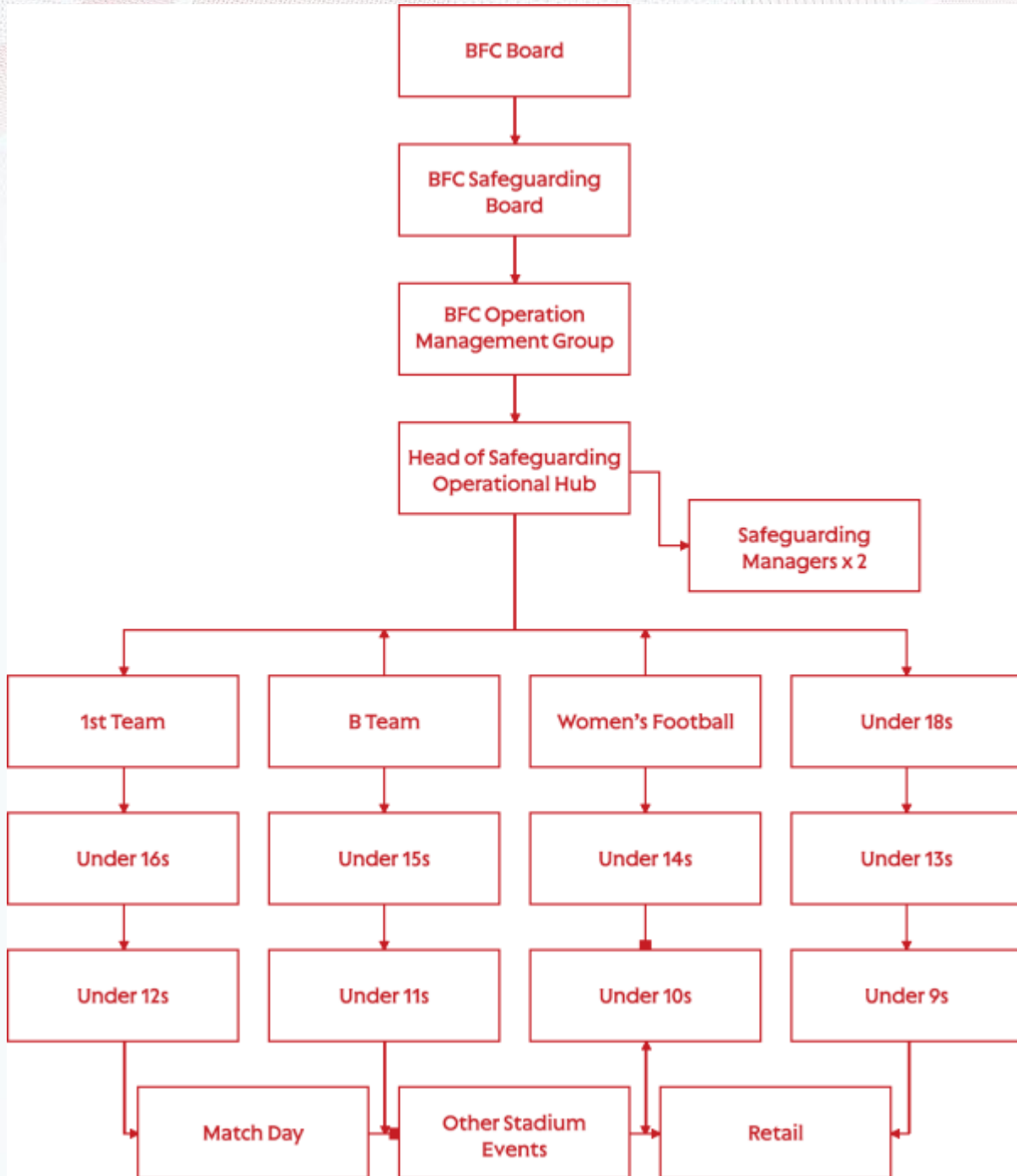
## Governance

The structure and governance of safeguarding within the Club and Trust is paramount to ensure all relevant legislation, guidance and policies are followed. The Club and Trust work jointly in their strategic approach to Safeguarding. Brentford’s governance structure provides visibility of all aspects of safeguarding through a defined management model which allows operational concerns and trends to be communicated to senior management to enable strategic decision making to take place.

Policy Owner – Natalie Craig	Policy date August 2023	Policy to be reviewed – August 2024
------------------------------	-------------------------	-------------------------------------



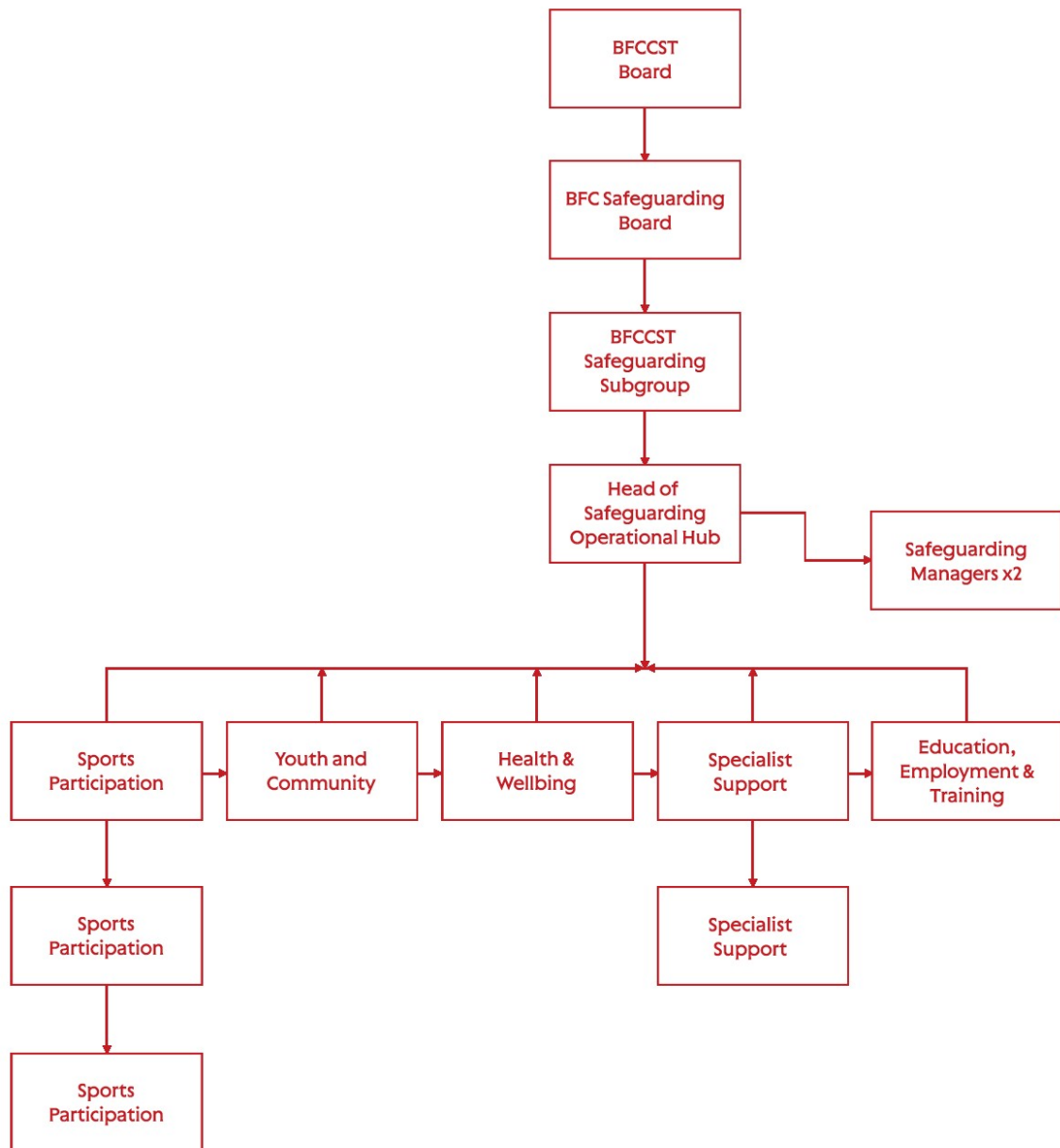
## BFC Safeguarding Governance Structure







## Trust Governance structure





## Safeguarding Roles and Responsibilities

Every member of staff, volunteer or contractor working for Brentford has a duty to safeguard everyone who attends the Club, Trust, or any other activities it has arranged.

### BFC Safeguarding Board

The responsibilities of the safeguarding board are:

- To ensure as a minimum that the Club fulfils its statutory Safeguarding requirements as outlined within Premier League Safeguarding Standards, Working Together to Safeguard Children, Keeping Children Safe in Education, and the Prevent Duty.
- Drive forwards a vision for the business to exceed minimum requirements and excel in all areas of safeguarding practice and the Prevent Duty.
- Quality check safeguarding related policies and procedures to ensure that they reflect the above requirements and work towards driving forwards a current and effective safeguarding agenda.
- To receive updates from and guide the Head of Safeguarding in all aspects related to safeguarding policy and practice, and ensuring that across the business, strategies are in place to ensure ALL staff take full responsibility for safeguarding of individuals.
- To receive updates from the Head of Safeguarding around effective practice across the business in relation to the Prevent Duty, including evidencing a proactive approach to the teaching, learning, and embedding of Fundamental British Values.
- Review safeguarding referral data and ensure that responses to patterns, trends, and the local context within the safeguarding landscape, are driven forwards from a senior leadership level.
- Quality check safeguarding audits and action plans, providing appropriate challenge in relation to areas for improvement and ensuring children, young people and adults at risk are heard.
- Continually review staff development activity around safeguarding practice to equip the workforce with the confidence, awareness, attitudes and toolkits to enable a consistently proactive safeguarding culture.

### BFC Operational Management Group/BFCCST Safeguarding Subgroup

This is a forum that brings all the relevant Head of Departments together to discuss the tactical safeguarding delivery within their area of business and to share best practice where identified.

The Head of Safeguarding will share information and risk analysis on identified cases to identify connectivity, themes, and trends to enable the group to identify further action that could be undertaken to ensure the continued welfare of all who attend Brentford FC.

Policy Owner – Natalie Craig	Policy date August 2023	Policy to be reviewed – August 2024
------------------------------	-------------------------	-------------------------------------





The group will ensure that all staff are trained and are competent to discharge their safeguarding responsibilities.

- To agree and implement the Safeguarding and Prevent Training schedule across the Club and Trust.
- Develop policies and procedures in line with current guidance in readiness for submission to the Safeguarding Board.
- To review any statutory safeguarding referrals that have been made to ensure they have met required standards and to identify any lessons learned.
- To implement and manage the safeguarding communication and engagement plan.
- Review host families' processes, identify any emerging issues and trends.
- Ensure structures are in place to capture the views of children, young people, and adults at risk.

### Head of Safeguarding Operational Hub

The Head of Safeguarding Operational Hub will provide the focal point for all Designated Safeguarding Officers (DSO) and deputies to discuss all matters relating to safeguarding and Prevent.

- Review individual safeguarding concerns and ensure all actions and necessary steps have been taken to provide a comprehensive wrap around service.
- Provide supervision and guidance to departmental DSOs.
- Identify cross cutting trends or themes that are emerging.
- Update CPD with any new guidance or changes in procedure.
- Analyse reports and data extracted from My Concern and make recommendations for the Operational Group
- Identify safeguarding training opportunities and update training records for all staff including new staff.
- Identify, discuss, and review any issues emerging for players in host families.
- Listen to feedback from children, young people, and adults at risk.

### Head of Safeguarding

To work across both Club and Trust to provide a clear sense of direction and purpose that assists both organisations to deliver their safeguarding strategies and implement policies and procedures that aim to promote and protect the welfare of children, young people, and adults at risk.

#### Main Responsibilities

- Lead the development and delivery of safeguarding strategies.

Policy Owner – Natalie Craig	Policy date August 2023	Policy to be reviewed – August 2024
------------------------------	-------------------------	-------------------------------------





- Ensure compliance with all statutory obligations under relevant legislation, rules, regulations, standards, and guidance as laid down by the football authorities under which the organisation is bound (i.e., the Premier League and the FA)
- Proactively identify and mitigate safeguarding risks to individuals and to the organisation.
- Lead on the development, implementation and regular review of safeguarding policies, procedures and practices and ensure they meet statutory and football authority requirements and are aligned with best practice.
- Ensure all internal and external stakeholders receive regular, relevant education in line with their level of role, responsibility and engagement with children, young people and/or adults at risk.
- Provide regular direction, reports and updates to the Safeguarding Board and operational groups.
- Work with HR and Heads of Departments to develop and implement safer recruitment and induction practices.
- Work to embed a culture of strong safeguarding awareness, engagement and working practices.
- Provide support, guidance, and direction to staff in respect of all safeguarding incidents, concerns or allegations and ensure full evaluation of any lessons learnt.
- Ensure all Designated Safeguarding Officers are appropriately trained, supported, regularly supervised, and facilitate regular safeguarding meetings.
- Develop and maintain relationships with statutory and football authorities (such as the Police, Local Authorities, NSPCC the Premier League, the Football League, and the FA)
- Ensure continued professional development by regularly attending relevant training and keeping up to date with current safeguarding issues and risks as well as changes to legislation, statutory guidance, and best practice.

### Safeguarding Manager

- Supporting the Head of Safeguarding and the relevant Heads of Departments to promote the welfare of people.
- Implementing reporting and recording procedures and where applicable be the first point of contact within the Safeguarding Team.
- Report safeguarding concerns or poor practice to the Head of Safeguarding.
- To maintain a high profile as the recognised point of contact, freely available to all individuals wishing to raise concerns or seek help and guidance on any questions connected with the Safeguarding Policy and Procedures.
- To attend safeguarding meetings within the safeguarding structure.

Policy Owner – Natalie Craig	Policy date August 2023	Policy to be reviewed – August 2024
------------------------------	-------------------------	-------------------------------------





- Communication with outside agencies through the direction of the Head of Safeguarding.
- Attend meetings with linked external agencies including LADO etc. through the direction of the Head of Safeguarding.
- Promote safe working practice guidance, Code of Conduct and assist with risk assessments of activities.
- Assist the Head of Safeguarding in keeping staff's safeguarding training up to date, including the FA Safeguarding Children Certificates and first aid for coaches and PL requirements. Identify areas for development / training needs.
- Delivery of some staff training (where identified & required).
- To communicate clearly with all staff, volunteers, parents/carers, and vulnerable groups on matters related to safeguarding, providing advice and support when necessary.
- Carry out monitoring visits to relevant sites/activities.

### Designated Safeguarding Officer

- Ensure a safe environment for people to flourish.
- Identification and reporting of safeguarding concerns.
- Maintaining, overview, and upkeep of records relating to safeguarding concerns.
- Attendance at meetings as directed by the Safeguarding Manager linked to safeguarding issues.
- Communication with outside agencies through the direction of the Designated Safeguarding Lead, Head of Safeguarding & Safeguarding Manager.
- Contact and attend meetings with linked external agencies through the direction of the Head of Safeguarding.
- Promotion of safe behaviours & safer practice within their department.
- Delivery of staff safeguarding awareness (where identified & required).
- To attend safeguarding meetings within the safeguarding structure.
- Advice and guidance for staff re safeguarding issues.

### Assistant Designated Safeguarding Officer

- To promote a positive safeguarding culture within the workplace.
- To be alert and recognise changes in behaviour, presentation and mood which may cause concern.
- To share and record these concerns with on MyConcern and discuss them with their Designated Safeguarding Officer.
- To be a nominated safeguarding representative when off site.

Policy Owner – Natalie Craig	Policy date August 2023	Policy to be reviewed – August 2024
------------------------------	-------------------------	-------------------------------------





## Learning & Development

All staff will undertake safeguarding and prevent training as part of their induction process. Staff who perform the role of Designated Safeguarding Officer (DSO)/Assistant Designated Safeguarding Officer (ADSO) will receive enhanced safeguarding training commensurate to their role. Additional training will be provided on at least a two-year basis.

The Head of Safeguarding will be responsible for managing all safeguarding training. The Head of Safeguarding will liaise with departmental heads to ensure scheduling of all training aligns with the departmental and Club's priorities to avoid conflict and increase participation. This will be set out in the workforce development programme across the Club and scheduled within a training calendar.

## Data Protection

### Confidentiality and Data Protection

While sharing information is crucial to safeguard children, it is equally important that this is done in line with government guidance, Information Sharing: A Guide for Practitioners 2018. Data protection is never a reason for not sharing safeguarding concerns, but data protection is also a protected right for children and families and must be adhered to (Data Protection Act 2018).

Confidentiality within a safeguarding context is key to lawful practice under the Data Protection Act and the Human Rights Act, and to maintaining a relationship of trust and respect with individuals. Sharing information should take place with the consent of parents, and in communication with children, wherever practicable. While consent is not required for the sharing of child protection concerns, consent and transparency are always preferred to achieve best practice.

### Storage of Information

Child protection information will be stored and handled in line with the Data Protection Act 2018 and UK GDPR.

- Information will be stored separately from other records and in a secure place with access granted to designated people, in line with the Data Protection Act 2018 – information will be accurate, regularly updated/corrected, the storage is relevant and secure. See NSPCC Guidance on Child Protection Records Retention and Storage for more information.
- All safeguarding and child protection data relating to children, families and carers will be stored on the MyConcern, which is a secure and encrypted case management system registered with the Information Commissioner's Office (ICO) and fully compliant with the Data Protection Act 2018.

Policy Owner – Natalie Craig	Policy date August 2023	Policy to be reviewed – August 2024
------------------------------	-------------------------	-------------------------------------





See the current Data Protection Policy for more information.

## Recruitment

Here at Brentford, it is vital we employ the best staff. All staff need to have characteristics and values that make them safe and suitable to work with young people. We ensure every person working directly with young people and adults at risk are safe by:

- Ensuring all prospective staff are subject to criminal record checks (Disclosure Barring Service) and a Self-Declaration Form
- Completing a risk assessment of any information contained in a DBS. If there is disagreement about the outcome of a risk assessment, a DBS panel will be convened. This is chaired by our Head of Safeguarding
- Interviewing applicants and recording recruitment decisions.
- Obtaining 2 references, including from the most recent employer.
- Verifying and recording applicant's qualifications and experience on a single central record.
- Providing staff with an induction to their role, including safeguarding policies and procedures and accredited safeguarding training.
- Ensuring all staff complete a probationary period.

## Professional Concerns

Where safeguarding concerns/allegations are raised which relate to any member of staff including both on and off pitch, volunteers, and contractors the organisation will robustly investigate appointing a case manager to assess the risk and take lead on any investigation that may be necessary.

The concerns/allegations will be initially assessed to threshold their level of seriousness. This will then fall in to one of two areas, namely:

1. Allegations that may meet the harm threshold.
2. Allegations/concerns that do not meet the harm threshold – referred to for the purposes of this policy as 'low-level concerns.'

Any concern that is being dealt with as a 'low level' concern may at any time be escalated to the higher threshold if the emerging information or circumstances warrant such action.

### Concerns that may meet the harm threshold.

Where it is alleged that anyone working in the club with children under 18 years of age, including all staff, volunteers and contractors has:

- behaved in a way that has harmed a child, or may have harmed a child and/or

Policy Owner – Natalie Craig	Policy date August 2023	Policy to be reviewed – August 2024
------------------------------	-------------------------	-------------------------------------





- possibly committed a criminal offence against or related to a child, and/or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

The club will have a legal duty to investigate the circumstances of the concern, liaise with the Local Authority Designated Officer (LADO) and then inform the FA. Any external referrals will be made and managed by the Safeguarding Team.

The club will appoint a case manager to take the matter forward and to be the central point of contact for external agencies. The two aspects to consider when managing the allegation will be:

- **Looking after the welfare of the child** - the Head of Safeguarding (or their deputy, a Safeguarding Manager) is responsible for ensuring the child is not at risk and referring cases of suspected abuse to the local authority as described in part four of KCSIE.
- **Investigating and supporting the person subject to the allegation** - the case manager should discuss with the LADO, the nature, content, and context of the allegation, and agree a course of action.

### Concerns and or allegations that do not meet the harm threshold.

Any concerns (including allegations) which do not meet the harm threshold, referred to in this policy as ‘low-level’ concerns.

### Low-level concerns

The club encourages and promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the club (including all staff, volunteers, and contractors) are dealt with promptly and appropriately.

The club will ensure that all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this will:

- encourage an open and transparent culture.
- enable the club to identify inappropriate, problematic, or concerning behaviour early.
- minimise the risk of abuse, and
- ensure adults working in or on behalf of the club are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the club.

Policy Owner – Natalie Craig	Policy date August 2023	Policy to be reviewed – August 2024
------------------------------	-------------------------	-------------------------------------





The term ‘low-level’ concern does not mean it is insignificant. A low-level concern is any concern – no matter how small, and even if causing no more than a sense of unease or a ‘nagging doubt’ - that an adult working in or on behalf of the club may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

All low-level concerns will be recorded in writing. The record will include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns will also be noted, if the individual wishes to remain anonymous this will be respected unless there is a legal requirement to disclose.

The club will ensure all low-level concerns are initially shared with the Head of Safeguarding for assessment and management. The Head of Safeguarding will work collaboratively with the relevant responsible Director and the People Director to address and resolve the concern.

All records regarding any professional concern irrespective of seriousness will be kept confidential, held securely, and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

Further information on how to apply this part of the policy will be contained within the guidance document ‘Managing Professional Concerns’ and the staff code of conduct policy.

## Photography

At times, the Club may wish to take photographs or videos of our players to celebrate football events. We may ask to take images of players to analyse performance during training. We follow The FA and Premier League guidelines on the capture and use of images.

We understand that in some instances the use of photography and video imagery can present difficulties or risk for varying reasons. Therefore, Brentford will ask for consent to take and use images or video of participants. Where specific arrangements need to be made regarding images of children and young people, decisions are made in consultation with a child’s parent or carer. In the case of photography and video imagery taken at matches, consent is included in the terms and conditions of entry.

Policy Owner – Natalie Craig	Policy date August 2023	Policy to be reviewed – August 2024
------------------------------	-------------------------	-------------------------------------





## Accommodation

Some of the players in Brentford live with host families. Host families usually reside close to the training ground and this arrangement is managed by Brentford.

Host families are usually arranged when a player's family lives far away from the training ground. Living nearby makes the player's life easier and helps them to achieve their full potential in training. We understand that getting this arrangement right is very important for young players and their parents/carers. To achieve this, we make sure that every host family has been carefully selected and checked and the setting provides a friendly, safe, and welcoming environment.

This is achieved by:

- Having a detailed application form to ensure potential host families have the qualities that make them a good fit with young people. We ask for details about their family, home, and motivations.
- Visiting the family at their home. We check that the house is comfortable for a young person. We assess bedrooms, and outside space and complete a Health and Safety assessment.
- Interviewing the family. We follow statutory guidance to ensure best practice when assessing host families. We will ensure the assessment is rigorous and in line with best practice.
- With consent, we complete detailed criminal record checks of all family members (Disclosure Barring Service). We undertake checks with the Local Authority.
- Listen to children and young people within host families to make sure decisions take their perspective into account.
- Regular engagement with hosted players will take place and be recorded.

Every young person living with a host family is visited regularly by a staff member from the Player Care Team at the Academy. These visits are conducted to ensure the placement is the right fit for the young player. All visits will be recorded and retained on a secure MIS. Any concerns regarding the welfare of the child/adult at risk will be recorded onto MyConcern and the Safeguarding Manager will be informed.

Communication between the Academy, young players and their parents is regular through a channel that is preferable to everyone e.g., meetings, phone calls, email, or text. Host families are reviewed annually.

Any issues regarding arrangements or welfare are acted on swiftly and in collaboration with all parties to ensure the best outcome for the young person.

Policy Owner – Natalie Craig	Policy date August 2023	Policy to be reviewed – August 2024
------------------------------	-------------------------	-------------------------------------





## Child Protection

Child protection is the specific and statutory response required by those working with children where there is a concern that the child is suffering significant harm or abuse (i.e., referring to children's social care, and police as needed).

### Abuse

Abuse describes any action that causes harm to a child or young person. Abuse can occur in any setting and be carried out by adults or young people.

Whether experienced over a long period of time, or an isolated incident, abuse can have a significant impact on children's health and well-being.

The signs of child abuse aren't always obvious. But there can be behaviours that children display that might indicate they are experiencing abuse. Sometimes, physical signs of abuse might be noticeable - however it's important to remember that this is not always the case.

Not all children experiencing abuse will display these physical and behavioural signs. Some may experience a combination of behaviours that change over time. Other children may try to hide any physical signs that something is happening to them. You might notice some of the signs but feel unsure about whether abuse is going on. It's not your responsibility to investigate abuse. You can get advice and support about the next steps to take to keep the child safe from the Safeguarding Team.

### Reporting Concerns

If a concern is raised about a child or young person, due to something that has been observed about their behaviour or appearance, or because of something they or another person has disclosed, this must be reported to a member of the Safeguarding Team, immediately where possible, and – at most – within 24 hours.

- Staff's responsibility is to report to the Safeguarding Team (via a phone call and then by MyConcern, if urgent)
- The Safeguarding Team's responsibility is to make decisions about levels of risk and next steps.

Being concerned about a child – for example, where their behaviour is out of character may not always mean they are being harmed or abused. Sometimes a conversation with the child and/or their parent/carer is warranted to try to understand what is going on. All concerns, **however minor**, must be recorded on MyConcern, this is to ensure a complete and current picture of the child/young person is always maintained.

Policy Owner – Natalie Craig	Policy date August 2023	Policy to be reviewed – August 2024
------------------------------	-------------------------	-------------------------------------





If concerns persist after talking to children and their parent/carer, you must report immediately to the Safeguarding Team.

If a child or young person discloses being hurt by their parent or carer, please contact the Safeguarding Team, do not contact the parent or carer.

### Assessing Risk

At times, more information is needed to understand and assess the nature and seriousness of concerns.

The Safeguarding Manager may do this by undertaking the activities such as (but not limited to):

- Asking the child/young person open questions
- Speaking to parents about concerns
- Speaking to other staff / professionals
- Reviewing communications
- Viewing documents / CCTV, etc.

Once sufficient information is obtained, the Head of Safeguarding, and their deputies, will determine whether a referral is needed. If unclear, the Head of Safeguarding will consult MASH for their view.

### Prevent Duty

PREVENT is one of the four elements of “CONTEST”, the government’s counter-terrorism strategy. The four elements are:

- Pursue
- Protect
- Prepare
- Prevent

PREVENT aims to stop people becoming involved in violent extremism. The Prevent Strategy responds to the ideological challenge of terrorism and aspects of extremism, and the threat from those who promote these views’ The PREVENT Duty incorporates the responsibility to promote fundamental British Values:

The PREVENT Duty covers all forms of radicalisation, including risk from extremist faith groups, far right extremism and some aspects of non-violent extremism.

### Prevent Risk Assessment and Action Plan

The Club will undertake a risk assessment of where and how individuals might be at risk of being drawn into terrorism. The level of risk will vary between activities, geographical location, and profile of participants.

Policy Owner – Natalie Craig	Policy date August 2023	Policy to be reviewed – August 2024
------------------------------	-------------------------	-------------------------------------





All staff in regulated activity will complete a biannual “Raising Awareness About Prevent” training. Staff must also complete the online PREVENT training as part of their Club induction.

### Reporting Extremist Narratives or Radicalisation Concerns

All staff have a duty of care to report and escalate concerns using the Club’s safeguarding reporting process.

For more information, see:

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

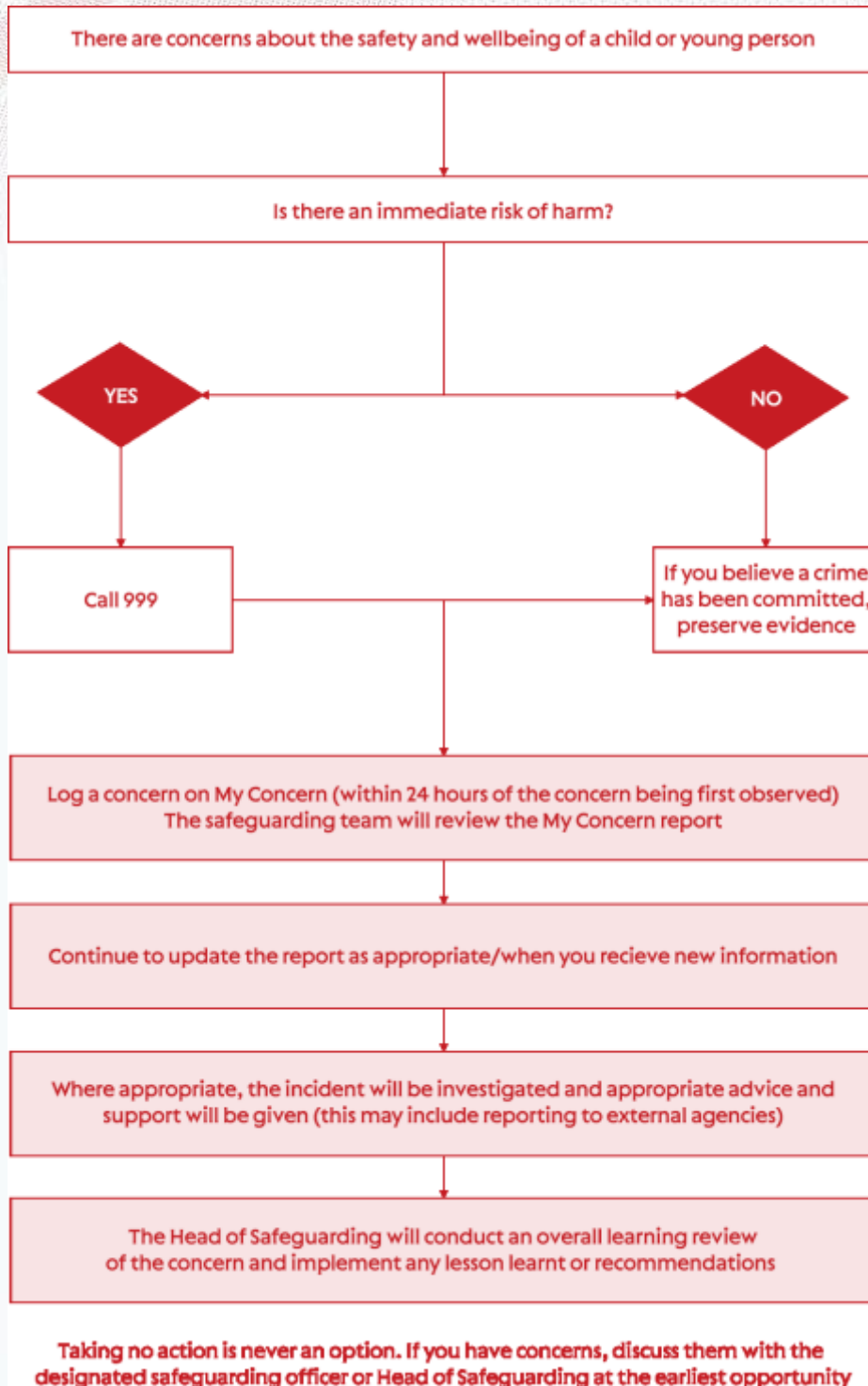
### Raising a Safeguarding Concern

No one should ever assume that someone else will help a child or young person, if a person has a worry, they should report it. It is not the responsibility of anyone at the Club to decide whether abuse has taken place. We ask everyone to remember that safeguarding is everyone’s responsibility. Staff will be fully supported and protected if they make any report in good faith about a concern. If you have a concern, you should follow the following procedure.

Policy Owner – Natalie Craig	Policy date August 2023	Policy to be reviewed – August 2024
------------------------------	-------------------------	-------------------------------------



## Reporting Flowchart







## SAFEGUARDING LEGISLATION AND GUIDANCE

This Policy is in line with child protection and safeguarding legislation, including:

The Children's Act 1989

Children Act 2004

Safeguarding Vulnerable Groups Act 2006

Human Rights Act 1998

Domestic Violence Act 2018

Sexual Offences Act 2003

The UK Data Protection Act and UK General Data Protection Regulation 2018

Statutory guidance:

Working Together to Safeguard Children 2018

Keeping Children Safe in Education 2022

Local guidance:

London Child Protection Procedures 2022

Football guidance:

- The Football Association Safeguarding Policy and Procedures
- The Premier League Safeguarding Policy and Procedures 2022/2023
- Premier League Guidance for Safer Working Practice

### RELATED CLUB POLICIES:

This policy should be read alongside the following:

- Managing Allegations against Staff Policy
- Recruitment and Selection Policy
- Code of Conduct
- Modern Slavery Act Statement

### Policy Review

This Policy is subject to regular review to ensure that it is fit for purpose. These reviews take place after all safeguarding concerns and incidents and in line with changes of legislative documents and guidance updates.



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NSPCC  
0808 800 5000 (24-hour helpline) [help@nspcc.org.uk](mailto:help@nspcc.org.uk) [www.nspcc.org.uk](http://www.nspcc.org.uk)

Child Line  
0800 1111 2417 | [www.childline.org.uk](http://www.childline.org.uk)

Child Protection in Sport Unit  
0116 234 7278 | [cpsu@nspcc.org.uk](mailto:cpsu@nspcc.org.uk) | [www.thecpsu.org.uk](http://www.thecpsu.org.uk)

CEOP Centre – Child Exploitation and Online Protection  
[www.thinkuknow.co.uk](http://www.thinkuknow.co.uk)      [www.ceop.police.uk](http://www.ceop.police.uk)

Policy Owner – Natalie Craig	Policy date August 2023	Policy to be reviewed – August 2024
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## APPENDIX 1. DEFINITIONS OF ABUSE

Abuse is any form of maltreatment.

- Somebody may abuse or neglect someone by inflicting harm or by failing to act to prevent harm.
- Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.
- People may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse.
- Children may be abused by an adult or adults or by another child or children – indeed a third of all child abuse is perpetrated by others under 18.

### Physical abuse:

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

### Emotional abuse:

- The persistent emotional maltreatment of an individual such as to cause severe and adverse effects on the child's emotional development.
- It may involve conveying to someone that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
- It may include not giving someone 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 from participating in normal social interaction.
- It may involve seeing or hearing the ill-treatment of another, such as witnessing domestic abuse and coercive control or the abuse of a sibling.
- It may involve serious bullying (including cyberbullying), causing someone 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 an individual, although it may occur alone.





### Sexual abuse:

- Involves forcing or enticing an individual to take part in sexual activities, not necessarily involving violence, whether or not they are 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. Sexual abuse is not solely perpetrated by adult males.
- Women can also commit acts of sexual abuse, as can other children.
- The sexual abuse of children by other children is a specific safeguarding issue in all forms of training / education and all staff should be aware of it.

### Neglect:

- The persistent failure to meet an individual's basic physical and/or psychological needs, likely to result in the serious impairment of their health or development.
- Neglect may occur during pregnancy, for example, as a result of maternal substance abuse.
- 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).
  - or ensure access to appropriate medical care or treatment.
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

### Financial abuse:

- Financial abuse is a type of abuse which includes having money or other property stolen, being defrauded, being put under pressure in relation to money or other property and having money or other property misused.
- It may also include:
  - Borrowing money and not giving it back
  - Stealing money or belongings
  - Taking pension payments or other benefits away from someone.
  - Taking money as payment for coming to visit or spending time together.

Policy Owner – Natalie Craig	Policy date August 2023	Policy to be reviewed – August 2024
------------------------------	-------------------------	-------------------------------------





- Forcing someone to sell their home or assets without consent.
- Tricking someone into bad investments
- Forcing someone to make changes in wills, property or inheritance.



## APPENDIX 2. SAFEGUARDING ISSUES

### Recognising abuse, bullying and other harms

- The Club is committed to making it as difficult as possible for anyone to be abused, exploited or mistreated while engaged in football-related activities.
- All staff and volunteers have a responsibility to play a part in preventing and reporting abuse or any incident or behaviour that compromises the safety and/or welfare of children, young people and adults at risk.
- Everyone has a role to play in reporting abuse or any incident or behaviour that causes concern or puts someone at risk of harm.
- Staff are not expected to be an expert in recognising abuse; however, all staff should be vigilant and ensure that they always respond swiftly and appropriately to safeguarding allegations, concerns and incidents in line with the Club's policies, procedures and training.

This section describes forms of abuse, inappropriate behaviour and other safeguarding concerns that must be reported to the Safeguarding Team who will take such steps as are considered necessary to ensure the safety and welfare of individuals.

All staff should be aware that your Club's policies and procedures may define additional safeguarding issues and behaviour that must also be recorded and reported.

Knowledge, understanding and being able to recognise abuse and poor practice contributes to a safer culture and environment.

In addition to physical abuse, emotional abuse, sexual abuse and neglect, there are a range of safeguarding concerns that staff must be able to recognize.

### Child-on-child abuse

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both onsite and offsite. All staff have an important role to play in preventing it and responding where they believe a child may be at risk from it.

All staff should understand that even if there are no reports within the Club, it does not mean it is not happening, it may be the case that it is just not being reported. It is important if staff have any concerns regarding child-on-child abuse they should speak to the Safeguarding Team.

It is essential that all staff understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are abusive in nature.

Policy Owner – Natalie Craig	Policy date August 2023	Policy to be reviewed – August 2024
------------------------------	-------------------------	-------------------------------------





Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- consensual and non-consensual sharing of nude and semi-nude images and/or videos<sup>11</sup> (also known as sexting or youth produced sexual imagery)
- ‘upskirting’, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

### Sexual image sharing

Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal, whilst non-consensual is illegal and abusive. UK Council for Internet Safety provides detailed advice about the sharing of nude and semi-nude images and videos.

### Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.

Policy Owner – Natalie Craig	Policy date August 2023	Policy to be reviewed – August 2024
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CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

### **Criminal Exploitation**

All staff should be aware of the indicators, which may signal children/adults at risk are at risk from, or are involved with, serious violent crime.

These may include:

- increased absence from school or college,
- a change in friendships or
- relationships with older individuals or groups,
- a significant decline in performance,
- signs of self-harm or a significant change in wellbeing, or
- signs of assault or unexplained injuries.

Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

### **County lines**

The organised criminal distribution of drugs by gangs from the big cities into smaller towns and rural areas using Children and Adults at Risk.

Gangs recruit Children and Adults at Risk through deception, intimidation, violence, debt bondage and/or grooming.

Gangs also use local property as a base for their activities, and this often involves taking over the home of an Adult at Risk who is unable to challenge them (cuckooing).

County line gangs pose a significant threat to Children and Adults at Risk upon whom they rely to conduct and/or facilitate such criminality.

### **Domestic Abuse**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial, or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

### **Mental Health**

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Policy Owner – Natalie Craig	Policy date August 2023	Policy to be reviewed – August 2024
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Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children/adults at risk day-to-day and identify those whose behaviour suggests they may be experiencing a mental health problem or be at risk of developing one. The club can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies.

If staff have a mental health concern about a child/adult at risk that is also a safeguarding concern, immediate action should be taken, engaging with the Safeguarding Team, and completing a MyConcern report.

### **Harmful sexual behaviour**

Developmentally inappropriate sexual behaviour displayed by children which is harmful or abusive.

Harmful sexual behaviour involves one or more children engaging in sexual discussions or acts that are inappropriate for their age or stage of development.

These can range from using sexually explicit words and phrases to full penetrative sex with other children or adults. It may also be referred to as sexually harmful behaviour or sexualised behaviour. It can be displayed towards younger children, peers, older children, or adults, and is harmful to the children who display it, as well as the people it is directed towards.

### **Grooming**

The process of developing a relationship with and the trust of an individual, and sometimes their family, to exploit, abuse or traffic them. Grooming can happen both online and in person.

### **Modern Slavery**

Modern slavery is a hidden crime that affects every country. Modern slavery covers a set of specific legal concepts including forced labour, debt bondage, forced marriage, slavery and slavery-like practices, and human trafficking. Although modern slavery is not defined in law, it is used as an umbrella term that focuses attention on commonalities across these legal concepts. Essentially, it refers to situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception, and/or abuse of power.

### **Radicalisation**

The process by which a person comes to support terrorism and forms of extremism leading to terrorism. Anybody from any background can become radicalised. The grooming of Children or Adults at Risk for the purposes of involvement in extremist activity is a serious safeguarding issue.

### **Female genital mutilation (FGM)**

Policy Owner – Natalie Craig	Policy date August 2023	Policy to be reviewed – August 2024
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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 girls who are British nationals or permanent residents of the UK abroad for FGM whether or not it is lawful in another country.

## Gambling

Gambling is when you risk money (or something of value) in a game or a bet in the hope of winning money or a prize. There are lots of different types of gambling and it may not be clear that some activities are gambling. The Gambling Act 2005 sets out how gambling is regulated in the UK, it covers arcades, betting, bingo, casinos, gaming machines, society lotteries, and online gambling.

For most gambling activities, the legal age is 18. However, there are some which do not have age restrictions, like playing a toy grabber game in the hope of catching a prize or making a bet with a friend.

## Gaming

Gaming refers to playing electronic games, whether through consoles, computers, mobile phones or another medium altogether. Gaming is a nuanced term that suggests regular gameplay, possibly as a hobby. Although traditionally a solitary form of relaxation, online multiplayer video games have made gaming a popular group activity as well.

## Forced Marriage

A forced marriage is where one of both people do not or cannot consent to the marriages and pressure or abuse is used to force them into the marriage. It is also when anything is done to make someone marry before they turn 18, even if there is no pressure or abuse. Forced marriage is illegal in the UK. It is a form of domestic abuse and a serious abuse of human rights.

The pressure put on people to marry against their will may be:

- physical: for example, threats, physical violence, or sexual violence.
- emotional and psychological: for example, making someone feel like they are bringing 'shame' on their family.
- financial abuse: for example, taking someone's wages, may also be a factor.

Policy Owner – Natalie Craig	Policy date August 2023	Policy to be reviewed – August 2024
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### APPENDIX 3. NOTIFYING THE FOOTBALL ASSOCIATION AND THE PREMIER LEAGUE OF ALLEGATIONS

The Club will notify the relevant Football authorities (the Premier League and the FA) of, and give such further information as they may require in respect of:

- any allegations involving members of staff (whether current, prospective or former) in respect of children or vulnerable adults.
- an incident or allegation of ‘poor practice’ (where it is the third or a subsequent occasion of poor practice, whether or not the relevant incident or allegation is similar in nature to previous incidents or allegations of poor practice) – that is, behaviours which contravene existing codes of conduct, infringe an individual’s rights and/or reflect a failure to fulfil high standards of care. It includes things like insufficient care being taken to avoid injuries, allowing abusive or concerning practices to go unreported, allowing embarrassing/harassing practices to go unreported, placing individuals in uncomfortable situations, for example, inappropriate use of social media/messaging with young players etc.
- any actions agreed to be taken in respect of the individual; and
- any allegation of abuse of a child or adult at risk committed by a player or a participant in any activity organised by the Club or Trust.

All such matters must be referred to the Premier League and the Football Association as soon as reasonably practicable.

Where a referral is made to an ‘external agency’ (such as the police, the LADO or the DBS), this must be referred to the football authorities within 24 hours, along with all relevant information and evidence provided to the external agency in respect of the same.

Failure to report a concern may result in action taken by The FA under its Disciplinary Regulations and/or the Premier League under Rule W.

Policy Owner – Natalie Craig	Policy date August 2023	Policy to be reviewed – August 2024
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