



Safeguarding Young People & Adults at Risk

An Easy Read guide for Participants, Parents & Guardians



EFL Trust Safeguarding Statement

EFL Trust believe that all children, young people and adults at risk have the right to live a life free from harm and abuse and that everybody has a role to play in their protection. We place safeguarding at the heart of all our activities and those carried out by our network of Club Community Organisations and other partners.

We are committed to working with local communities to develop impactful programmes which develop the skills of children, young people and adults at risk and create an environment in which they can realise their full potential. EFL Trust recognise our responsibility in promoting the health, safety and wellbeing of all participants accessing programmes and support our network of Club Community Organisations and other partners in implementing robust safeguarding policies & procedures and continually reviewing and improving their ways of working to ensure the best possible outcomes for individuals in their reach.

We understand that the safeguarding of children, young people and adults at risk is not limited to the delivery of safe programmes and our duty to recognise and respond accordingly to welfare issues unrelated to EFL Trust activities. We are committed to working with Local Authorities to prevent harm to children, young people and adults at risk.

EFL Trust are committed to the ongoing support of the survivors of historical abuse in football and promote the work undertaken by affiliated football authorities.

Definitions

Activity – any activity, programme or event arranged by or in the name of the EFL Trust for Children, Young People and/or Adults at Risk, or to be attended by Children, Young People and/or Adults at Risk.

Child, Children, Young Person and Young People – any person(s) who have not yet reached their eighteenth birthday.

Adult at Risk – any person(s) aged 18 years or over and has needs for care and support (whether or not the local authority is meeting any of those needs); is experiencing, or at risk of, abuse or neglect; or as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

EFL Trust – the charitable arm of the English Football League.

Club Community Organisation – the charitable organisation associated with an EFL member football club.

Partner Organisation – any organisation that is not a Club Community Organisation that runs activities in the name of EFL Trust.

Safeguarding Children and Young People – the actions taken to promote the welfare of children and protect them from harm.



This means:

- Protecting Children and Young People from abuse and maltreatment
- Preventing harm to their health or development
- Ensuring they grow up with the provision of safe and effective care
- Taking action to enable all Children and Young People to have the best outcomes.

Staff – any person employed or deployed by the EFL Trust whether in a paid, voluntary, consultancy or third-party capacity.

Safeguarding Adults at Risk – the actions taken to promote the welfare of adults at risk and protect them from harm.

This means:

- Protecting adults at risk from abuse and maltreatment
- Responding to any signs that may indicate that abuse is occurring outside of our activities
- Taking action to enable all adults at risk to have the best outcomes.

Online Safety – keeping children, young people and adults at risk safe when using online platforms such as social media platforms and live streaming forums and any devices which connect to the internet such as computers, smart phones and tablets. This includes raising awareness of personal safety online and keeping personal information safe online.

The Football Association (“The FA”) – English football’s governing body.

Local Authority – the organisation responsible for public services in your area and promoting the interests of your local community. For safeguarding, this may include the police and departments responsible for the welfare of children, young people and adults such as Children’s Services and Adult Social Care.

What types of harm and abuse may children & young people vulnerable to?

Children and young people may be vulnerable to a number of different types of abuse. This may be within the family home, in care or support services, in educational settings or within the wider community.

Adapted from:

- HM Government Guidance: Working Together to Safeguard Children (2018) and What to do if you are worried a child is being abused, Advice for practitioners (2015)
- Child Protection in Sport Unit (CPSU) guidance
- Affiliated Football Policy and Procedures
- NHS England guidance
- NSPCC guidance
- The Ann Craft Trust



Categories of Abuse:

Physical abuse

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

Potential indicators of physical abuse: *(This is not an exhaustive list)*

- Children or young people with frequent injuries;
- Children or young people with unexplained or unusual fractures or broken bones; and
- Children or young people with unexplained: bruises or cuts; burns or scalds; or bite marks.

Emotional abuse

The persistent emotional maltreatment of a child or young person such as to cause severe and persistent adverse effects on their emotional development. It may involve conveying to a child or young person that they are worthless or unloved, inadequate, or valued only when they meet the needs of another person.

It may include not giving the child or young person 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 or young people.

These may include interactions that are beyond a child or young person's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child or young person 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 or young people frequently to feel frightened or in danger, or the exploitation or corruption of children or young people.

Some level of emotional abuse is involved in all types of maltreatment of a child or young person, though it may occur alone.

Possible indicators of emotional abuse: *(This is not an exhaustive list)*

- Children or young people who are excessively withdrawn, fearful, or anxious about doing something wrong;
- Parents or carers who withdraw their attention from their child, giving the child the 'cold shoulder';
- Parents or carers blaming their problems on their child; and
- Parents or carers who humiliate their child, for example, by name-calling or making negative comparisons.



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 or young person 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 or young people in looking at, or in the production of, sexual images, watching sexual activities, encouraging children or young people to behave in sexually inappropriate ways, or grooming a child or young person in preparation for abuse (including via the internet).

Sexual abuse is not solely perpetrated by adult males. People of all genders and ages can commit acts of sexual abuse, including other children or young people.

Possible indicators of sexual abuse: *(This is not an exhaustive list)*

- Children who display knowledge or interest in sexual acts inappropriate to their age;
- Children who use sexual language or have sexual knowledge that you would not expect them to have;
- Children who ask others to behave sexually or play sexual games;
- Children or young people with physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections or underage pregnancy.

Neglect

The persistent failure to meet a child or young person's basic physical and/or psychological needs, likely to result in the serious impairment of the child or young person'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 or young person from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers); or
- ensure access to appropriate medical care or treatment.

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

Possible indicators of neglect: *(This is not an exhaustive list)*



Children or young people who:

- are living in a home that is indisputably dirty or unsafe;
- are left hungry or dirty;
- are left without adequate clothing, e.g. not having a winter coat;
- are living in dangerous conditions, i.e. around drugs, alcohol or violence;
- are often angry, aggressive or self-harm;
- fail to receive basic health care; and
- Parents who fail to seek medical treatment when their children are ill or are injured.

Other Safeguarding considerations

Discriminatory Abuse

This includes forms of harassment, slurs or unfair treatment relating to an individual's:

- race
- gender and gender identity
- age
- disability
- sexual orientation
- religion

Child Sexual Exploitation (CSE)

Sexual exploitation of children and young people under 18 involves exploitative situations and relationships where children or young people receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities.

Child sexual exploitation can occur through the use of technology without the child or young person's immediate recognition; for example being persuaded to post sexual images on the Internet or through mobile phone messaging without immediate payment or gain. In all cases, those exploiting the child or young person have power over them due to their age, gender, intellect, physical strength and/or economic or other resources.

Violence, coercion and intimidation are common in exploitative relationships.



Bullying

Bullying is defined as persistent or repeated hostile and intimidating behaviour towards a child or young person. Bullying is behaviour that hurts someone else – such as name calling, hitting, pushing, spreading rumors, threatening or undermining someone.

It can happen anywhere – at school, at home or online. It is usually repeated over a long period of time and can hurt a child or young person both physically and emotionally.

Bullying that happens online, using social networks, games and mobile phones, is often called **cyberbullying**. A child can feel like there is no escape because it can happen wherever they are, at any time of day or night

Peer on Peer Abuse

Peer on peer abuse can take many forms including physical, sexual (e.g. inappropriate touching) and emotional abuse (including bullying). 'Keeping Children Safe in Education (KCSIE 2020); makes it clear that abuse is abuse and should never be tolerated or passed off as 'banter'.

Peer on peer abuse often involves an imbalance of power between the perpetrator and the victim. This could involve perpetrators having control over the relationship which makes it difficult for those they abuse to defend themselves. This imbalance of power can manifest itself in several ways. It may be physical, psychological (knowing what upsets someone), or social (e.g. isolating or excluding someone). It could also include issues such as revenge porn or what are often gender issues (e.g. girls being touched or boys being involved in initiation activities).

Self-Harm

This is where an individual or sometimes a group will intentionally damage or injure their body, physically or by way of ingestion of substances. It is usually used as a way of coping or expressing overwhelming emotional distress.

Sometimes where people self-harm, they may feel on some level that they intend to die. Over half of people who die by suicide have a history of self-harm (NHS England 2016).

However, the intention is more often to punish themselves, express their distress or relieve unbearable tension, or a mixture of the two. It can also be a cry for help.

Online abuse

Online abuse is any type of abuse that happens on the internet, whether through social networks, playing online games or using mobile phones. Children and young people may experience cyberbullying, grooming, sexual abuse, sexual exploitation or emotional abuse.



Children and young people can be at risk of online abuse from people they know, as well as from strangers. Online abuse may be part of abuse that is taking place in the real world (for example bullying or grooming). Or it may be that the abuse only happens online (for example persuading children or young people to take part in sexual activity online).

Children and young people can feel like there is no escape from online abuse – abusers can contact them at any time of the day or night, the abuse can come into safe places like their bedrooms, and images and videos can be stored and shared with other people.

Cyberbullying includes:

- Sending threatening or abusive text messages
- Creating and sharing embarrassing images or videos
- ‘Trolling’ – the sending of menacing or upsetting messages on social networks, chat rooms or online games
- Excluding children or young people from online games, activities or friendship groups
- Setting up hate sites or groups about a particular child or young person
- Encouraging children or young people to self-harm
- Voting for or against someone in an abusive poll
- Creating fake accounts, hijacking or stealing online identities to embarrass a child or young person or cause trouble using their name
- Sending explicit messages, also known as sexting
- Pressuring a child or young person into sending sexual images or engaging in sexual conversations

Grooming

Grooming is when someone builds an emotional connection with a child or young person to gain their trust for the purpose of sexual abuse or exploitation.

Children and young people can be groomed online or in the real world, by a stranger or by someone they know - for example a family member, friend or professional. Groomers may be male or female. They can be any age.

Many children and young people do not understand that they have been groomed, or that what has happened is abuse.



Children and young people with disabilities

Research has consistently shown that children and young people with a disability are more at risk of abuse. A Disability may be visible such as a physical disability or invisible such as a learning disability. Many things contribute to this including:

- Poor practice resulting from not understanding the care and support the child or young person needs
- Attitudes and assumptions about disability – assuming a child or young person is less or more capable than they are
- A child or young person's dependency on other people for care or support
- Lack of awareness and the belief that disabled children are not abused
- Factors linked to the impairment i.e. it may be harder to communicate or avoid the abuser if the child or young person depends on them

Hazing

Hazing is any action or situation, with or without the consent of the participants, which recklessly, intentionally, or unintentionally endangers the mental, physical, or emotional wellbeing of a child or young person.

An example of hazing would be a group initiation ceremony, where a child or young person is forcibly encouraged to take part in activities that put them or others at risk of harm or take part in antisocial or criminal activity.

Female Genital Mutilation (FGM)

Female genital mutilation is a form of child abuse common to some African, Asian and Middle Eastern communities in the UK. This illegal and life-threatening initiation ritual can leave young victims in agony and with physical and psychological problems that can continue into adulthood. Carried out in secret and often without anaesthetic it involves the partial or total removal of the external female genital organs.

The NSPCC Female Genital Mutilation (FGM) helpline offers specialist advice, information and support to anyone concerned that a child's welfare is at risk because of female genital mutilation. If you are worried that a child may be at risk of FGM, you can contact the 24 hour helpline anonymously on 0800 028 3550 or email fgmhelp@nspcc.org.uk.

If you wish to find out more about FGM then you can access the NSPCC's fact sheet <https://www.nspcc.org.uk/>.



Forced Marriage

A forced marriage is where one or both people do not (or in cases of people with learning disabilities or due to age cannot) consent to the marriage and pressure or abuse is used. It is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights.

The Forced Marriage Unit (FMU) operates a public helpline to provide advice and support to victims and those being pressurised into forced marriages. If you are worried that a child may be at risk of forced marriage, you can contact FMU via the helpline on 020 7008 0151 or email fmu@fco.gov.uk. For more information on forced marriages go to www.gov.uk/forced-marriage

Honour based violence

The term 'Honour Based Violence' (HBV) is the internationally recognised term describing cultural justifications for violence and abuse. It justifies the use of certain types of violence and abuse against women, men and children.

HBV cuts across all cultures, nationalities, faith groups and communities and transcends national and international boundaries. HBV is also a Domestic Abuse issue, a Child Abuse concern and a crime.

Domestic Abuse

Domestic abuse is any type of controlling, bullying, threatening or violent behaviour between people in a relationship. But it isn't just physical violence – domestic abuse includes emotional, physical, sexual, financial or psychological abuse.

It can happen in any relationship, and even after the relationship has ended. Both men and women can be abused or abusers, and it can happen in mixed sex or same sex relationships.

Domestic abuse can seriously harm children and young people. Witnessing domestic abuse is child abuse, and teenagers can suffer domestic abuse in their relationships.

You can read more about domestic abuse here: <https://www.victimsupport.org.uk/crime-info/types-crime/domestic-abuse>

Supporting the LGBT + Community

Young people from the LGBT+ community (Lesbian, Gay, Bisexual, Transgender and other non-conforming sexual/gender identities) come from all socio-economic backgrounds, religions, faiths, ethnicities and cultures.

LGBT+ people remain largely invisible across sports. This lack of visibility, as well as the misapprehensions about LGBT+ people, contributes to an environment of homophobia and transphobia in sport.



Challenging homophobia and transphobia when they occur, and creating a football environment where everyone feels included is critical.

Every young person has the right to be treated with dignity and respect; regardless of sexual orientation or gender identity.

For further information visit www.stonewall.org.uk or to speak with someone call 0800 050 2020.

Radicalisation and Prevent Duty

Radicalisation is the process through which a person comes to support or be involved in extremist ideologies. It can result in a person becoming drawn into terrorism and is in itself a form of harm.

The grooming process is used to exploit children and young people into taking extremist actions. The process happens slowly and the child or young person often does not realise they are being exploited.

The Prevent Duty, as a specified authority under the Counter-Terrorism and Security Act 2015, is the duty for organisations to identify vulnerable children and young people and prevent them from being drawn into terrorism.

If you are concerned that a child or young person is involved is at risk of radicalisation you can contact the Anti-Terrorism Hotline on 0800 789 321.

Criminal Exploitation & Gangs

Criminal exploitation is child abuse where children and young people are manipulated and coerced into committing crimes such as selling or moving drugs.

County Lines

County Lines is where illegal drugs are transported from one area to another, often across police and local authority boundaries (although not exclusively), usually by children or vulnerable people who are coerced into it by gangs. The 'County Line' is the mobile phone line used to take the orders of drugs.

Cuckooing

Cuckooing is a form of crime, termed by the police, in which drug dealers take over the home of a vulnerable person in order to use it as a base for county lines drug trafficking. The crime is named for the cuckoo's practice of taking over other birds' nests for its young



What types are harm and abuse may adults at risk be vulnerable to?

Although adults at risk are vulnerable to many of the same types of abuse as children and young people, EFL Trust recognise that they may be at risk of other types of abuse or harm, particularly where they rely on the support and care of others.

Financial or material abuse

The Care Act 2014 describes 'financial abuse' as 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.

Types of financial or material abuse:

- Theft of money or possessions
- Fraud, scamming
- Preventing a person from accessing their own money, benefits or assets
- Employees taking a loan from a person using the service
- Undue pressure, duress, threat or undue influence put on the person in connection with loans, wills, property, inheritance or financial transactions
- Arranging less care than is needed to save money to maximise inheritance
- Denying assistance to manage/monitor financial affairs
- Denying assistance to access benefits
- Misuse of personal allowance in a care home
- Misuse of benefits or direct payments in a family home
- Someone moving into a person's home and living rent free without agreement or under duress
- False representation, using another person's bank account, cards or documents
- Exploitation of a person's money or assets, e.g. unauthorised use of a car
- Misuse of a power of attorney, deputy, appointeeship or other legal authority
- Rogue trading – e.g. unnecessary or overpriced property repairs and failure to carry out agreed repairs or poor workmanship



Modern slavery

Modern slavery is defined as the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation.

- Types of modern slavery:
- Human trafficking
- Forced labour
- Domestic servitude
- Sexual exploitation, such as escort work, prostitution and pornography
- Debt bondage – being forced to work to pay off debts that realistically they never will be able to
- Being forced or coerced to move or sell drugs on behalf of individuals or gangs (related to county lines activities)
- Being forced or coerced into allowing individuals or gangs to use their place of residence to sell drugs or carry out other illegal activities (known as cuckooing & related to county lines activities)

Discriminatory abuse

Discriminatory abuse is when someone is treated unfairly based on a 'protected characteristic'.

Types of discriminatory abuse:

- Unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as **'protected characteristics' under the Equality Act 2010**)
- Verbal abuse, derogatory remarks or inappropriate use of language related to a protected characteristic
- Denying access to communication aids, not allowing access to an interpreter, signer or lip-reader
- Harassment or deliberate exclusion on the grounds of a protected characteristic
- Denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic
- Substandard service provision relating to a protected characteristic



Organisational or institutional abuse

Organisational or Institutional abuse includes neglect and poor care practice within a specific care setting. This could be a hospital or a care home, but also the care a person receives in their own home.

Types of organisational or institutional abuse:

- Discouraging visits or the involvement of relatives or friends
- Run-down or overcrowded establishment
- Authoritarian management or rigid regimes
- Lack of leadership and supervision
- Insufficient staff or high turnover resulting in poor quality care
- Abusive and disrespectful attitudes towards people using the service
- Inappropriate use of restraints
- Lack of respect for dignity and privacy
- Failure to manage residents with abusive behaviour
- Not providing adequate food and drink, or assistance with eating
- Not offering choice or promoting independence
- Misuse of medication
- Failure to provide care with dentures, spectacles or hearing aids
- Not taking account of individuals' cultural, religious or ethnic needs
- Failure to respond to abuse appropriately
- Interference with personal correspondence or communication
- Failure to respond to complaints

Self-neglect

Self-neglect is a behaviour or behaviours where a person neglects to attend to their basic needs, such as personal hygiene, appropriate clothing, feeding, or tending appropriately to any medical conditions they have.



Types of self-neglect:

- Lack of self-care to an extent that it threatens personal health and safety
- Neglecting to care for one's personal hygiene, health or surroundings
- Inability to avoid self-harm
- Failure to seek help or access services to meet health and social care needs
- Inability or unwillingness to manage one's personal affairs

Mate Crime

A "mate crime" is when "vulnerable people are befriended by members of the community who go on to exploit and take advantage of them" (Safety Network Project, ARC). It may not be an illegal act, but it still has a negative effect on the individual. A mate crime is carried out by someone the adult knows, and it often happens in private. In recent years there have been a number of Serious Care Reviews relating to people with a learning disability who were seriously harmed, or even murdered, by people who purported to be their friend.

How do EFL Trust keep young people & adults at risk safe from harm and abuse during their activities?

Staff suitability – EFL Trust are committed to the recruitment and development of suitable staff. This means:

- All staff working for EFL Trust have been through a strict 'Safer Recruitment' process to make sure they are suitable to work with children, young people and adults at risk. This includes a Disclosure & Barring Service (DBS) check, which is rechecked every 3 years.
- A Code of Conduct is in place for all staff working on EFL Trust activities.
- Staff receive a safeguarding induction and also safeguarding training to make sure they fully understand their responsibilities to protect children, young people and adults at risk, as well as what action to take if they have a concern.
- Staff receive ongoing support and supervision from EFL Trust.
- A clear process is in place for managing concerns around staff conduct or behaviour. This includes notifying the Local Authority/police where conduct harms a child, young person or adult at risk.



Suitability of premises – EFL Trust make sure that any venues used to carry out activities with children, young people and adults at risk are safe. This means:

- Health & Safety checks are carried out.
- Risk Assessments are carried out to identify and minimise any risks.
- Venues provide EFL Trust with insurance documents.
- EFL Trust carry out 'Dynamic Risk Assessments' while using venues to identify and minimise any new or unforeseen risks.
- Site inductions are carried out so that all staff, children, young people and adults at risk are made aware of general facilities, any areas which are "off limits" and the protocol for emergency evacuations.

Suitability of online platforms – When engaging with children, young people and adults at risk online, EFL Trust will:

- Risk assess online platforms to ensure they are safe for use.
- Ensure online platforms suitable to keep participant information secure.
- Ensure there is clear guidance in place for safe and appropriate use, including a code of conduct for staff and for participants.
- Train staff on safe use of online platforms and risks online.
- Make sure there are staff running and supervising online activities.
- Clearly outline safety measures for all participants and ensure they know the process to follow if there is an issue.

Suitability of activity providers – EFL Trust make sure that any third parties used to deliver activities on our behalf are suitable to work with children, young people and vulnerable adults. EFL Trust will:

- Risk assess activities to make sure they are suitable and fit for purpose to deliver to children, young people and adults at risk.
- Carry out "Due Diligence" checks on third party activity providers to make sure they are suitable to work with children, young people and adults at risk.
- Supervise the delivery of all activities by a third party.
- Make sure third party deliverers are aware of EFL Trust safeguarding arrangements.



Safeguarding Arrangements – EFL Trust operate a safeguarding process for all activities, which includes:

- A Designated Safeguarding Officer (DSO) at every activity who is responsible for managing safeguarding concerns and informing the relevant people to make sure appropriate action is taken.
- A clear process is in place for managing safeguarding concerns and all staff working on the activity understand their responsibilities.
- A Code of Conduct is in place for all children, young people and adults at risk accessing an activity.
- Children, young people and adults at risk are made aware of who they can speak to if there is a problem.
- On-call arrangements are in place to make sure senior staff are available to provide guidance and management in case of a serious incident.

What do Club Community Organisations/Trusts do to keep young people & adults at risk safe?

- EFL Trust supports the network of CCOs and partner organisations with their safeguarding arrangements in the following ways:
- All CCOs and partner organisations are assessed by EFL Trust to make sure that their safeguarding, health and safety and safer recruitment policies, procedures and ways of working are fit for purpose and they are capable of delivering safe programmes.
- EFL Trust hold regular workshops and training with CCOs and partner organisations to support them to develop their working practices and stay on top of any changes to government guidance or legislation.
- The Safeguarding Team at EFL Trust are on hand to provide support and guidance in case of an incident or concern.



Who can I contact if I have a concern?

EFL Trust Safeguarding & Incident Manager Tara Lawson	01772 325800 safeguarding@efltrust.com
Director of Operations & Senior Safeguarding Manager SSM Mike Evans	01772 325800 mevans@efltrust.com
EFL Safeguarding Manager Alexandra Richards	01772 325800 arichards@efl.com
Lancashire Safeguarding Children Partnership	0300 123 6720 Out of hours: 0300 123 6722 (5pm - 8am)
Lancashire Adults Social Care Services	0300 123 6721
Local Authority Designated Officer LADO	01772 536 694
The FA/NSPCC	0808 500 5000 24 hour helpline
The FA Safeguarding Case Management Team	0800 169 1863 #6300
Pharos Response (NCS Concerns Only)	020 3637 0520 24 hour helpline
Anti-Terrorism Hotline	0800 789 321
NSPCC Female Genital Mutilation (FGM) Help line	0800 028 3550
Forced Marriage Unit (FMU)	0800 050 2020
Stonewall (LGBTQ+ support & guidance)	0800 050 2020.



What action will EFL Trust take if a safeguarding concern is raised or a disclosure is made?

Recognise – Staff are trained to recognise the indicators that a child, young person or adult at risk is experiencing or at risk of abuse or harm. Staff understand their safeguarding responsibilities and where they have a concern, they will follow EFL Trust procedures.

Respond – Staff will follow procedures by ensuring the immediate safety of the child, young person or adult at risk. They will notify the activity's DSO, who will ensure that appropriate action is taken.

Report – The DSO will report the concern to the relevant people on a 'need to know' basis only to make sure that the child, young person or adult at risk is supported in the most appropriate way.

Record – A thorough record of the concern will be made. This will include the date and time, the facts of what was seen or what was said only and the actions that have been taken so far. This record will be accurately updated as actions are taken.

Refer – Where the concern meets a 'Threshold' it will be referred to appropriate local authorities whose job it is to ensure protection of a child, young person or adult at risk (Police, Children's Services, Adult Social Care). This includes where the child, young person or adult at risk is at significant risk or harm or abuse, where a crime has been committed or where the conduct of a staff member would have caused serious harm to the person.

Who will EFL Trust share information about a safeguarding concern with?

EFL Trust operate a Data Protection Policy, which underpins the following government legislation:

- General Data Protection Regulations (GDPR) 2018
- The Data Protection Act (DPA) 2018

EFL Trust only collect, store and share information that we need to for legitimate purposes and will inform all participants of how and why their information is being used.

EFL Trust are committed to working with parents and guardians of children, young people and adults at risk accessing our activities. When sharing a concern with a parent or guardian, the following will be considered:

- If discussing the concern will negatively impact upon the welfare or safety of the child, young person or adult at risk (where the parent/guardian is the alleged perpetrator of abuse or harm).
- If the child, young person or adult at risks consents to you sharing the information.

Where a child, young person or adult at risk is at risk of harm, EFL Trust will need to share personal information with other parties such as the Local Authority to ensure their safety. At times, this may mean that we need to share information of a concern without their consent. In this case we would always be open and honest with them about:



- What information needs to be shared,
- Why this needs to be shared, and
- Who it will be shared with.

EFL Trust will never promise a child, young person or adult at risk that a disclosure or concern can be kept a secret.

Under GDPR and The Data Protection Act 2018, it is clearly stated that data protection is not a barrier to the sharing of information in relation to safeguarding. Schedule 8 of The Data Protection Act 2018 states the conditions for sensitive processing under Part 3 (Rights of the data subject) as:

Safeguarding of children and of individuals at risk

This condition is met if:

(a) the processing is necessary for the purposes of:

- (i) protecting an individual from neglect or physical, mental or emotional harm, or
- (ii) protecting the physical, mental or emotional well-being of an individual.

How does EFL Trust review safeguarding arrangements to make sure they're fit for purpose?

EFL Trust formally reviews all safeguarding policies and procedures once a year as a minimum. These are reviewed by an experienced and qualified Safeguarding & Incident Manager, The Senior Management Team and The Board.

Policies and procedures are reviewed more frequently as a result of any of the following:

- Changes to government legislation or guidance.
- Changes to risk (for example, the outbreak of COVID19).
- Review of an incident on an EFL Trust activity where lessons have been learned on how something could have been done differently.
- When new resources or information are available which change the way we operate.



Does EFL Trust work with other support services?

EFL Trust recognises the professional limitations of our workforce and that of CCOs and partner organisations operating within our network. We are committed to supporting children, young people and adults at risk accessing our programmes to achieve the best possible outcomes and as such endeavour to work with specialist support services operating nationally and within local communities.

Where a concern about the wellbeing of a child, young person or adult at risk does not meet the threshold for referral to the Local Authority for intervention from Children or Adult Services, EFL Trust will work with individuals on a person-centred basis to “signpost” them to appropriate professionals who can offer tailored support and guidance.

The FA and football network also work alongside a number of UK charities and agencies including:

- **Mind** – The official charity partner of the English Football League and are committed to raising awareness and finding support and guidance for issues relating to mental health.
- **NSPCC** – The FA operates a 24 hour help line for survivors of abuse in football via the UK’s leading children’s charity.

What support is available for survivors of historical abuse in Football?

In order to support those who have come forward and disclosed sexual abuse in a football context, affiliated football authorities have:

- **Set up a dedicated helpline number for survivors via the NSPCC.** This provides survivors with initial advice and guidance, as well as ensuring referrals are made to the police. From 23 November 2016 to 19 October 2017 the football helpline received more than 2,500 calls. 941 calls were from people concerned about abuse in football and approximately 65% of these resulted in referrals to external agencies. The remainder of the calls were enquiries and advice contacts.
- **Partnered with Sporting Chance:** This partnership is to provide nationwide opportunities for support to survivors of sexual abuse in football. Sporting Chance has increased the number of available phone lines, tailored the initial face-to-face therapist assessment process for survivors, developed a set of criteria to select therapists with expertise in the field, and educated them about the Crown Prosecution Service pre-trial therapy guidance. This is important to ensure that survivors receive support that will not hinder the progress of any criminal or civil justice processes.
- **Offered direct support to all known survivors via the police:** Only the police know the details of the survivors who have come forward to pursue a criminal justice route. With this in mind, a letter signed by all the football authorities was sent by Operation Hydrant to all 43 police forces to distribute to everyone who had come forward. This offered survivors who chose to, free specialist therapeutic support for a sustained period of time. This offer from the football authorities was shared with and supported by survivors with whom we had an active dialogue.



Information on how survivors can access support and further guidance is available here:

<http://www.thefa.com/football-rules-governance/safeguarding/section-9-support-for-survivors>

How is EFL Trust working differently as a result of COVID19?

EFL Trust are closely following government guidance to ensure all activities carried out across the network are appropriately safeguarded and the necessary Health & Safety precautions are taken.

As a result of COVID19, many activities have moved to online platforms. EFL Trust are supporting CCOs and Partner Organisations with training and guidance to amend policies and procedures accordingly and ensure they are able to deliver activities online safely.

All activities carried out with children, young people and adults at risk, whether online or in local communities will be individually risk assessed to ensure they can be delivered safely. Risk assessments are available to participants and parents and guardians.



EFL Trust Safeguarding Concern Process

