



SAFEGUARDING CHILDREN

POLICY & PROCEDURE



KEEPING YOU SAFE
At Cardiff City



CARDIFF CITY FOOTBALL CLUB SAFEGUARDING CHILDREN POLICY AND PROCEDURES

Prepared by

Rob Cronick, Head of Safeguarding, Cardiff City FC (June 2024)

Approved by

Cardiff City FC Board (June 2024)

Acknowledgement:

Designated Officer for Safeguarding and Cardiff Local Authority Safeguarding Service Manager (June 2024)

Resources:

The Premier League, The English Football League, The Football Association, The Social Services and Well-being (Wales) Act 2014, Wales Safeguarding Procedures, Working Together to Safeguard Children 2023.

Review date: June 2025

Cardiff City Football Club Limited will review this policy annually. However, the policy is under constant review and will be monitored and changed when there is an organisational change, change in legislation or guidance or following any learning outcomes from safeguarding incidents, concerns, or allegations.



Version Control Sheet

Version	Date	Author	Status	Comment
V5.0	June 2024	Rob Cronick Head of Safeguarding	Reviewed Safeguarding Policy including: <ul style="list-style-type: none">• Addition of Club Safeguarding Strategy 2024-2027	Removal of Match-day Safeguarding Procedures due to specific document being produced. Amendments to specific sections and legislation

V4.0	June 2023	Rob Cronick Head of Safeguarding	<p>Reviewed Safeguarding Policy including:</p> <ul style="list-style-type: none"> • Implementation of Club Safeguarding Strategy 2023-2026 • Change of Academy staff details • Amendment to Club safeguarding structure • Change to the 'Position of Trust' legislation with the creation of Section 22A of the Sexual Offences Act 2003 • Amendment to Photography and Images Policy • Changes to Matchday Safeguarding Arrangements • Revision of Club Safer Recruitment Policy • Removal of COVID 19 protocols • Change to Club kit supplier displayed by Bartley Bluebird • Additions to Keeping Children Safe in Education 2023 • Change to terminology within Local Authority Child Protection 	<p>Recommendations from EFL and Barnardo's Audits</p> <p>Recruitment of Player Care and Academy DSO</p> <p>Removal of COVID 19 protocols across Wales by the Welsh Government.</p> <p>Recommendations from the Local Authority Designated Officer for Safeguarding and Cardiff Local Authority Safeguarding Service Manager</p>
V3.0	January 2021	Rob Cronick Head of Safeguarding	<p>Reviewed Safeguarding Policy including:</p> <ul style="list-style-type: none"> • Reference to the Social Services and Wellbeing Act (Wales) 2014 • Reference Working Together 2018 • Reference to the Wales Safeguarding Procedures • Change PL to EFL • Update 'safer recruitment' policy to include 'will' be invited to interview • Update policy re consent to ALL trips and tours • Update policy to include reference to GDPR • Update flowchart to include 'and/or the child is at risk of immediate harm' and timescales for sharing information to the DSO or Head of Safeguarding • Regional Safeguarding Boards now in place • Reviewed Safeguarding Officers across Club confirmed including appointment of Head of Safeguarding • Version Control Sheet included in policy • Reference to vulnerable adults removed and changed to 'adults at risk' • Reference to Safeguarding Manager change to Head of Safeguarding • Useful Contact Information updated to reflect Club Safeguarding Team and new terminology for Statutory Partners 	<p>To reflect feedback from a review by NSPCC Child Protection in Sport Unit and new appointment of Head of Safeguarding</p> <p>Recommendations from Barnardo's audit of Cardiff City Football Club on behalf of the Premier League and EFL</p> <p>Recommendations from EFL Safeguarding Team</p> <p>Recommendations from Designated Officer for Safeguarding, Cardiff Social Care</p> <p>Impact on Club Safeguarding as a result of COVID 19</p>

			<ul style="list-style-type: none"> • Reviewed definitions of categories of abuse to include e.g. county lines, radicalisation • References to government documents changed to 2018 editions • New Child Friendly Safeguarding policy added • Addendum to Policy added to include COVID 19 statement • Reference made to the Low Level Concerns Policy 	
V2.0	July 2017	Helen Kay Safeguarding Manager	Reviewed Safeguarding Children Policy	Scheduled Review
V1.0	May 2014	Helen Kay Safeguarding Manager	Reviewed Safeguarding Children Policy	Promotion to the Premier League and EFL required formal safeguarding policy and procedure

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- Bullying and Cyber-Bullying
- Contextual Safeguarding
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POLICY

1. FOREWORD

“Cardiff City Football Club is firmly committed to ensuring the safety and well-being of all the individuals and communities with whom we engage, and therefore our aim is for the golden thread of safeguarding to run through every element of the club’s work.

Our new Safeguarding Strategy for 2023 – 2026 focuses on four key areas of SAFETY, POSITIVE EXPERIENCE, and EFFECTIVENESS, all underpinned by strong LEADERSHIP.

This strategy sets out our vision, core principles and strategic direction for safeguarding across all areas of our Club. It is our mission to **make every contact count**.

Through the application of this policy, we acknowledge our duty of care to safeguard and promote the welfare of children and adults at risk. The Club is committed to ensuring its safeguarding practice reflects its statutory responsibilities, government guidance and compliance with best practice and the requirements of The Football Association, The Football Association of Wales, The English Football League and The Premier League.”

Ken Choo

Chief Executive Officer and Senior Safeguarding Lead

“The staff and partners working with and for Cardiff City Football Club will work tirelessly to embed the culture of safeguarding club-wide with a relentless commitment in promoting vigilance.

We will develop and implement effective policy, appropriate reporting procedures and best practice in order to protect all children and adults at risk who attend the Club’s activities.

We will also strive to ensure the Club attracts and employs the correct people through our ‘safer recruitment’ policy to further protect those who participate at, and visit, Cardiff City Football Club.”

Rob Cronick

Head of Safeguarding

2. POLICY STATEMENT, PRINCIPLES AND AIMS

Policy Statement

Cardiff City Football Club ('the Club') is committed to safeguarding and protecting children and adults at risk who engage in Club organised activities.

Safeguarding is about protecting children and adults from abuse or neglect and educating those around them to recognise the signs and dangers.

Safeguarding is defined within 'Working Together to Safeguard Children 2023' as:

- Protecting children and young people from maltreatment;
- Preventing impairment of children or young people's health or development;
- Ensuring that children and young people are growing up in circumstances consistent with the provision of safe and effective care; and
- Taking action to enable all children and young people to have the best life chances

The Club will strive to keep children and adults at risk safe and free from harm at Cardiff City Stadium, in both our Academy and Womens and Girls Teams and our Community Foundation.

The Club takes its responsibilities seriously in this area and we are committed to:

- Getting the right people involved through safe recruitment and training
- Creating a safe environment for all visitors, participants and staff
- Having and promoting clear systems to deal with any issues or concerns

The Social Services and Well-being (Wales) Act introduced a strengthened, robust and effective partnership approach to safeguarding

Principles

One of the most important principles of safeguarding is that it is everyone's responsibility. Each professional and organisation must do everything they can to ensure that children and adults at risk are protected from abuse.

The Board of Directors at Cardiff City Football Club ('the Board') are committed to continually ensuring the well-being and safety of all children and adults at risk connected with our business activities, and to providing a safe and suitable environment for all those attending our premises for any purpose. It is the duty of all adults working in the Club to safeguard the welfare of children and adults at risk by creating an environment that protects them from harm.

The Club Head of Safeguarding works closely with the Cardiff and Vale Regional Safeguarding Board and their respective Safeguarding Managers for advice, guidance and referrals. The Head of Safeguarding will be guided by and adhere to Local Authority and Police protocols.

Policy Aims

- To develop a safe and welcoming environment for children and adults at risk involved in Club-led activities ensuring they are free from abuse and the fear of abuse in all its forms;
- To cultivate a culture where safeguarding practice is widely understood, openly discussed and where the workforce recognises the role they play in keeping children, adults at risk, themselves and colleagues, safe from harm;
- To promote a clear system that supports constant vigilance, prevention and early intervention in safeguarding matters and where necessary prompt and thorough action in response to any reported concerns or incidents;

- To apply legislation, government policy and guidance, and football governing body regulations, policy and guidance where applicable; and
- To work closely together with statutory agencies and other partners to promote and safeguard the welfare of children and adults at risk

Definitions

- A child is defined as anyone up to their 18th birthday. This definition will cover the phrase 'children and young people'.

'The Children's Act 1989'

3. SCOPE

This policy and procedure relates to safeguarding children to ensure best practice in safeguarding is promoted and adhered to. Any safeguarding concerns regarding Adults at Risk will fall under the Cardiff City Football Club 'Safeguarding Adults at Risk' Policy and Procedure.

This policy applies to all staff members of the business, including full time, part time, casual or pieceworker as well as any Consultants and Volunteers who work within the parameters of those at-risk groups of staff, customers or clients. All staff members, Consultants and Volunteers are required to adhere to this policy.

The Board may amend this policy at any time. The Board will continue to review this policy to ensure it is achieving its aims.

This policy applies to the Cardiff City Football Club Limited and all subsidiary companies and affiliates. It applies to all locations owned and operated by the Club including at locations hired to provide Club activities.

Failure to comply with this policy may be treated as misconduct and be dealt with under our Disciplinary Procedure and if a breach amounts to gross misconduct this may result in dismissal, possibly criminal prosecution and reporting of any incident to the appropriate regulatory or investigative body.

The well-being of children is paramount for all staff and accordingly, they must read and fully understand this policy. Where appropriate, the following guidelines will be supplemented by in-service training and additional guidance.

All staff: full time, part time, casual, piece worker, consultants and volunteers have the responsibility to report any concerns to the Head of Safeguarding.

The policy will be widely available at all Cardiff City Football Club facilities on request for those without access to the internet.

Activities undertaken at the following locations/departments are under the remit of this policy including:

- Cardiff City Stadium including all matchday roles and activities that come into contact with children
- Cardiff City Superstore
- Cardiff City Training Complex (the Vale)
- Cardiff City Academy (Llanrumney)
- Cardiff City House of Sport (Leckwith)
- Cardiff International Sports Campus (Leckwith)

- All away venues within scope of Academy and Womens and Girls Teams game programmes
- Travel, Events and Supporter Liaison
- Other Club related entities and activities undertaken outside of the UK

4. RELEVANT LEGISLATION, GUIDANCE AND REGULATIONS

- Adoption and Children Act 2002
- Child Exploitation Online Protection (CEOP) Guidance 2020
- Children (Abolition of Defence of Reasonable Punishment) (Wales) Act 2020
- Children Act 1989
- Children Act 2004
- Children and Families Act 2014
- Counter-Terrorism and Security Act 2015
- Education Act 2002
- EFL 'Guidance for Safer Working Practice'
- EFL 'Managing Safeguarding Concerns'
- EFL Safeguarding Standards 2024/2025
- Equality Act 2010
- FA Safeguarding Children Guidance
- FA 'Respect' Codes of Conduct
- Female Genital Mutilation Act 2003
- Forced Marriage Act 2008
- General Data Protection Regulation 2018
- Health and Safety at Work Act 1974
- Human Rights Act 1998
- HM Government Information Sharing Guidance for Practitioners 2018
- HM Government Regulated Activity in relation to Children 2018
- HM Government Working Together to Safeguard Children 2018
- Keeping Children Safe in Education 2023
- Keeping Learners Safe 2022
- Modern Slavery Act 2015
- Police Act 1997
- Protection of Children Act 1999
- Protection of Freedoms Act 2012
- Rehabilitation of Offenders Act 1974
- Safeguarding Vulnerable Groups Act 2006
- SEN Code of Practice 2015
- Social Services and Well-being (Wales) Act 2014

- Sexual Offences Act 2003
- The Well-being of Future Generations (Wales) Act 2015
- Work Based Learners and the Prevent Statutory Duty 2018

This list is not exhaustive.

S. RELATED CARDIFF CITY FOOTBALL CLUB POLICIES

This policy should be read in conjunction with the following Cardiff City Football Club documents:

- Anti-Bullying Policy
- Cardiff City Community Foundation Safeguarding Policies and Procedures
- Cardiff City Safeguarding Strategy 2024-2027
- Child Friendly Safeguarding Policy
- Data Handling and Protection Policy
- Employee Handbook including Grievance, Disciplinary, Whistleblowing and Equal Opportunities Policies
- Equality Policy
- Event Management Plan
- Health and Safety Policy
- Host Family Policy
- Low Level Concerns Policy
- Matchday Safeguarding Plan
- Safer Recruitment Policy
- Safe Driver Initiative
- Safeguarding Adults at Risk Policy & Procedures
- Safeguarding Social Media Policy
- Safeguarding Academy Players making a Senior Appearance
- Safeguarding U18s female players in the Senior Game
- Safeguarding Academy Players on Loan Policy
- Safeguarding Under 18 players using The Vale Training Complex
- Transport Policy
- Trips, Tours and Tournaments Policy

6. ROLES AND RESPONSIBILITIES

Cardiff City Football Club

Cardiff City Football Club believes that children and young people have the right to take part in sport in an environment which is safe and free from any risk of abuse.

We take all reasonable steps to reduce the risk of harm to children involved in Club activities and discharge our moral and legal responsibility to protect them.

Senior Safeguarding Lead

The Senior Safeguarding Lead for Cardiff City Football Club has leadership responsibility for the Club's safeguarding provision, in consultation with the Club's Head of Safeguarding, and actively champions safeguarding at Board level.

Head of Safeguarding

The Head of Safeguarding provides strategic leadership on safeguarding provision and issues across Cardiff City Football Club. This includes case management and the development and monitoring of policy and procedure.

Designated Safeguarding Officers

The Designated Safeguarding Officer (DSO) supports the Club's safeguarding policy, procedures and systems. The DSO acts as the first point of contact for safeguarding matters for a specific department within the Club and will forward concerns to the Head of Safeguarding.

Head of Department and Senior Staff

Specific responsibility for safeguarding policy, procedure and systems fall on management and those involved in the recruitment, selection and training of staff. Heads of Department and their managers are responsible for ensuring they comply with safeguarding, safer recruitment and safer working practices in their day to day operation.

Staff

The Club's Employee Handbook details the responsibilities of each employee and describes the disciplinary, grievance, equal opportunities and whistle blowing policies.

The Cardiff City Football Club Safeguarding Structure appears on the next page.

For a list of Designated Safeguarding Officers at Cardiff City Football Club and external contacts, please refer to the information contained in the Appendices

CARDIFF CITY FOOTBALL CLUB SAFEGUARDING ORGANISATION CHART

Rob Cronick
Head of Safeguarding



Dawn Williamson
Head of HR

Safeguarding Executives & Directors

Designated Officer for Safeguarding & Cardiff Local Authority Safeguarding



English Football League Executive Office (Safeguarding)



The Football Association Case Management Team



The Football Association of Wales Compliance Department (Safeguarding)



Cardiff City FC Board of Directors incl Senior Safeguarding Lead

Club Safeguarding Team

Academy Designated Safeguarding Officer
Steve Pearce

Academy Player Care Manager
Sarah Nightingale

Women & Girls Team
Iain Darbyshire

Disability Access Officer
Ben Jones

Stewarding & Event Manager
Tom Nash

Community Foundation Senior Safeguarding Manager
Roxanne Williams

Safeguarding Officers

Key Areas of Responsibility

- To support the Head of Safeguarding in promoting the moral & legal responsibilities of safeguarding at the Club;
- Day to day management of safeguarding issues;
- Record and refer to the Head of Safeguarding all relevant incidents of poor practice and possible abuse;
- Safer Recruitment
- Identify Staff Safeguarding training needs;
- Support Club-wide safeguarding strategy.

6 Monthly Reviews of Club-wide Safeguarding



Matchday Safeguarding Roles

Vulnerable Groups

Disability Access Officer

Mascots

Fan Experience

Ball Team

Matchday Co-ordinator

Flag Bearers

Fan Experience

7. GOOD PRACTICE AND CODE OF CONDUCT

To ensure all children and young people have the most positive and safe experience when engaging with the club, all employees, workers, consultants, agency staff and volunteers should adhere to the following principles and action (to ensure they role model positive behaviours and so reduce the risk of allegations, abuse and neglect occurring):

- Listen carefully to children and young people about his/her needs, wishes, ideas and concerns and take them seriously;
- Treat all children and young people equally not showing favouritism;
- Always work in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication with no secrets);
- Make the experience of the activity fun and enjoyable;
- Promote fairness, confront and deal with bullying;
- Maintain a safe and appropriate distance with children and young people and avoid unnecessary physical contact;
- Where any form of manual/physical support is required it should be provided openly and with the consent of the child or young person;
- If children and young people have to be supervised in changing rooms always ensure coaches etc. work in pairs;
- Request written consent if the club are required to transport children and young people using the Club's Consent Form for any activities, events or significant travel arrangements e.g. overnight stays
- Employees and workers should maintain their qualifications and professional development;
- A qualified first aider is in attendance or readily available;
- Maintain appropriate professional relationships with children and young people, including only engaging with them online with prior approval and through the club's social media channels;
- On trips, ensure that adults should not enter a child or young person's room unless there is a safety concern, in which case two adults should enter and should not invite children or young people into their rooms;
- Be a good role model, this includes not swearing, smoking or drinking alcohol in the company of children and young people;
- Always give enthusiastic and constructive feedback rather than negative criticism;
- Promote the club's vision and values and be an ambassador for those values;
- Ensure children and young people adhere to his/her relevant Code of Conduct;
- Secure written consent for the club to administer emergency first aid or other medical treatment if the need arises;
- Reward effort as well as performance;
- Challenge unacceptable or inappropriate behaviour;
- Encourage children and young people to take responsibility for his/her own behaviour and performance;
- Keep a written record of any incident or injury that occurs, along with details of any treatment given or action taken using the Club's Safeguarding Concern Reporting Form (see appendix).
- Recording safeguarding concerns on the online platform 'My Concern' or within the Safeguarding Concern Reporting Form.

This list is not exhaustive.

8. UNACCEPTABLE PRACTICE

The following are examples that are regarded as poor practice and should be avoided by all employees, workers, consultants, agency staff and volunteers:

- Unnecessarily spending excessive amounts of time individually with a child or young person away from others;
- Being alone in changing rooms, toilet facilities or showers used by children and young people;
- Taking children and young people alone in a car or journey unless written consent is sought from the club's Safeguarding Team for emergency situations;
- Taking children and young people to your home or places where they will be alone with you;
- Sharing a room with children and young people;
- Engaging in rough, physical or sexually provocative games, including horseplay;
- Allowing or engaging in inappropriate touching of any form;
- Using or allowing to be used, inappropriate language towards or in the presence of children and young people;
- Allowing children and young people to use inappropriate language unchallenged;
- Making sexually suggestive comments to children and young people, even in fun;
- Reducing children and young people to tears as a form of control;
- Allowing allegations made by children and young people to go unchallenged, unrecorded or not acted upon;
- Doing things of a personal nature that children and young people can do for themselves.
- Not recording safeguarding concerns on the Safeguarding Incident Form or 'My Concern' application;
- Sending inappropriate text messages or social media messages to children and young people;
- Having children or young people engaged with the club as 'friends' or 'followers' within social networking sites such as Facebook, Twitter and Instagram; and
- Engaging with children and young people on 'one to one' personal electronic communications

This list is not exhaustive.

9. STAFF/CHILD RELATIONSHIPS

The Club provide advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with children. Staff found in breach of these rules or the Staff Code of Conduct may be subject to disciplinary action and/or a safeguarding investigation.

- Staff should ensure they maintain healthy, positive and professional relationships with all children (Under 18) and Adults at Risk
- Staff working with children are in a 'position of trust' in relation to young people aged 16 and 17 years. Club personnel must not engage in sexual relationships with them whilst that unequal power relationship exists
- Even after the young person has reached the age of 18, the Club prohibits relationships between personnel and young people for whom they have previously been responsible

Abuse of Position of Trust

All staff are aware that inappropriate behaviour towards children is unacceptable. At all times, their conduct towards children must be professional.

Under new legislation, enacted in 2022, it is illegal for those in a position of trust to engage in sexual activity with a child in their care, even if the child is above the age of consent (16 or 17) (22A Sexual Offences Act 2003; Sexual Offences (Northern Ireland) Order 2008; Sexual Offences (Scotland) Act 2009).

The legislation sets out which roles and settings are classed as 'positions of trust'. This includes settings such as:

hospitals

independent clinics

residential care homes

voluntary homes or children's homes

residential family centres

schools and educational institutions and now;

religious settings and;

sports settings.

Cardiff City Football Club will take disciplinary action in situations where an adult in a position of authority has abused their position of trust by having sexual contact with a 16 or 17-year-old. Consultation with the Police and Local Authority Designated Officer for Safeguarding will take place as will referral to the Disclosure and Barring Service, and the Affiliated Football Bodies.

The Club's Employee Handbook sets out this expectation on staff.

Advice for anyone concerned about the possible abuse of a position of trust

If you suspect that an abuse of a position of trust has occurred, is occurring or may occur, you should report this to the Police, Designated Safeguarding Officer or the Head of Safeguarding using the contact details listed in the Appendix of this document. If the matter relates to a member of the Safeguarding Team or Club Head of Safeguarding please contact:

The **Safeguarding Manager** at the **EFL** on **01772 325940** or email: safeguarding@efl.com

Cardiff Multi-Agency Safeguarding Hub (MASH) on **02920 536400** (out of hours **02920 788570**)

Alternatively, you can seek advice from our statutory partners listed in the Appendix or the 24-hour NSPCC Helpline – **0808 800 5000**.

PROCEDURES

10. SAFER RECRUITMENT

1. 1. Aims and objectives

The recruitment and selection decision is of prime importance as the vehicle of obtaining the best possible

person-to-job fit which will, when aggregated, contribute significantly towards Cardiff City Football Club Limited's ("the Company's") effectiveness. It is also important, as the Company evolves and changes, that new recruits show a willingness to learn, adapt and ability to work as part of a team. The Recruitment & Selection policy and procedure is designed to assist in meeting these objectives, and in addition, to ensure

that any recruitment and selection is:

- Fair and consistent;
- non-discriminatory on the grounds of sex, race, age, religion or disability;
- conforms to statutory regulations and agreed best practice.
- As part of the Club's recruitment and selection process, offers of work to positions which involve working with children are subject to 'Safer Recruitment' principles. This principle will be evident in the publishing and circulation of any recruitment advert.

2. 2. Job vacancies

2.1 Prior to embarking on any recruitment or selection, the job vacancy (including casual and permanent vacancies) under consideration must be clearly defined. In defining the vacancy a Head of Department must:

- identify whether a vacancy has arisen in an existing post, and if so whether an exact replacement is required or whether there is an opportunity to revise the requirements, or whether there is a new post;
- prepare/update a job description for the vacancy which should include statements on safeguarding and equality
- recommend the appropriate terms and conditions, including pay rates or salary band, and other benefits.

2.2 The above details must be provided to the HR department and authorised by the Chief Executive Officer prior to commencing any recruitment activity.

3. 3. Recruitment

3.1 Prior to commencing recruitment activity an appointing Head of Department must agree with the Head of Human Resources the most effective means of obtaining suitable candidates. The following options may be used:

- internal advert within the Club;
- examination of previous applications, or those held on file within the HR department;
- external advert with UK Sport
- external advert with EFL
- external advert with LinkedIn (if authorised in advance)
- external advert in the local press;
- external advert in the National press;
- external advert in the appropriate technical/professional bodies; and
- in senior posts, the use of a recruitment agency (if authorised in advance)

3.2 It is the Company's policy to advertise opportunities internally wherever possible, and appropriate notices should be posted on internal notice boards at all locations which may have individuals working with the necessary skills or experience to fulfil the vacant post. The advert

will also be emailed internally to all staff who have access to email. The period before which external recruitment will commence should be determined before any internal advert is posted. The Company reserves the right to consider the impact of the loss of an individual on any given site/location as part of the process of assessing applications.

3.3 Any advertisements placed should contain as much information as possible to ensure the correct recruitment group is targeted and reduce unsuitable application, whilst remaining as cost-effective as possible. As such any advertisement should give an indication of the terms and conditions applicable to the job, although precise details need not be included.

3.4 External adverts must be submitted to the Head of Human Resources for approval and authorised by the Chief Executive Officer before being placed.

4. Selection

4.1 Appropriate selection procedures must be used for each post. Procedures may vary dependent on the vacancy and, at their simplest, procedures may involve a straight forward interview or skills testing. For more senior posts, presentations to the interview panel on a chosen topic and/or a series of individual interviews on various topics may be included. The appointing Head of Department will approach relevant people to assist with short listing and interviewing. Normally, at least two people should be involved in short listing and/or sit on the Interview Panel. The Head of Human Resources must be included in all final interviews for permanent staff where possible. The appointing Head of Department must be included for all interviews for casual staff where possible. The Chief Executive Officer must be included when recruiting senior members of staff. As a minimum, a job description/individual specification must be used to develop selection criteria table for use during the selection process. Different selection criteria tables may be used for each stage of the selection process, if appropriate. 4.2 A clear timetable and allocation of responsibilities must be agreed between the appointing Head of Department and Head of Human Resources for administering the selection process prior to its commencement including:

- placement of advertisements and closing dates for applications;
- receipt and collation of applications/CV'S;
- invitations to candidates for interview, include the following documentation:-

1. the completed self declaration form in a sealed envelope (if applicable)
2. right to work in the UK e.g original passport etc.
3. original DBS (if applicable)

- timetabling the interviews;
- obtaining two references when the position has been offered and accepted; and
- informing successful and unsuccessful candidates.

4.3 Any application forms/CV's received after the agreed closing date must be disregarded unless otherwise agreed by the Head of Human Resources.

4.4 Each candidate shortlisted for interview, will be informed that an open source online search will be conducted ahead of interview, in line with the recommendations from 'Keeping Children Safe in Education 2023'.

4.5 Applicants **must** be assessed against the selection criteria tables, and the appointing Head of Department must record in writing the reasons why an applicant has not been shortlisted for interview or rejected following the interview.

4.6 At the interview, the appointing Head of Department will ensure that at least 3 panel members will be present (if possible) one of whom should be safer recruitment trained. All Heads of Department must be trained in Safer Recruitment. An Interview Report Form is completed as fully as possible – an example of a possible format for the Interview Report Form is included in Appendix 1 although this should be adapted to meet the circumstances of each vacancy. When interviewing, staff will ensure that Equal Opportunities legislation is strictly adhered to, with no discrimination shown on the grounds of sex, religion, age, disability, ethnic origin or sexual orientation.

A copy of the interview questions should be emailed to the Head of HR before the interview takes place and should include value based questions under the headings of Compassion, collaboration, innovation, responsibility, diversity, integrity, quality and trust. Please speak to HR if you need guidance on the interview questions.

Any gaps in employment should be explored during the interview process.

4.7 All papers for all candidates both successful or unsuccessful, be they from the application or

interview stage, must be returned to the Head of Human Resources, for confidential filing/destruction.

4.8 When all candidates have been interviewed, the panel will decide on the best person for the post. The envelope containing the self declaration from the successful candidate may now be opened and the contents reviewed. The appointing manager will arrange to inform the successful candidate as soon as possible, identifying a commencement date and confirming the terms and conditions of employment including starting salary and any other benefits. This may initially be done verbally but must be confirmed in writing. In both cases it must be noted that the post is offered subject to the provision of satisfactory references and up to date DBS certificate if applicable for that role.

4.9 References must be obtained as soon as practicable following the offer of the post, and the impact of the results must be considered and communicated to the candidate immediately thereafter by the appointing manager. The Human Resources Department will be responsible for obtaining the references for all permanent employees and the appointing Head of Department will be responsible for obtaining references for all casual workers. The appointing Head of Department should email a copy of the reference to the Human Resources Department for recording and file as and when they have been received.

5.0 All papers for the successful candidate, including references must be sent to the HR department for confidential filing within the individual's personnel file, whilst the HR department will arrange for the issue of a contract of employment incorporating the agreed terms and conditions.

5. Safer Recruitment of External Candidates

- Completion of an application form which includes their employment history and an explanation for any gaps in that history;
- An interview, if shortlisted;
- Provision of two referees, including at least one who can comment on the applicant's suitability for the role and suitability to work with children if applicable for the role. One reference must be from their most recent employer;
- Provision of evidence of identity and qualifications;
- If an offer of employment is made, the applicant is to be checked in accordance with the Disclosure and Barring Service (DBS) regulations as appropriate to their role. This will include an Enhanced Level DBS check and a child barring list check for those engaged in 'Regulated Activity'. The certification will expire after 3 years. If applicable for the role.
- An applicant will be required to complete the Club's Self Declaration Form prior to their commencement of employment and are required to inform the Club if their circumstances have changed that will affect their DBS status. All staff involved in regulated activity will complete this form annually.
- If an offer of employment is made, provision of evidence of the applicant's right to work in the UK will be required.
- On appointment the applicant's details will be uploaded to the Staff 'Single Central Record' by the Head of Safeguarding.

6. Safer Recruitment of Internal Candidates

The above process for the safer recruitment of external candidates will be followed. However, in relation to the provision of references the following two strand process will be adopted:

Same Discipline Recruitment

There will be no requirement for internal candidates to provide references in this strand of the process. Any adverse conduct or comment will be collated from the annual appraisal process.

Change of Discipline Recruitment

If there is a distinct change of role, a reference will be provided by the candidates line manager to provide information relating to the candidates suitability for the vacant role.

'Regulated Activity'

The new definition of regulated activity (i.e. work that a barred person must not do) in relation to children comprises, in summary:

1. unsupervised activities: teach, train, instruct, care for or supervise children, or provide advice/guidance on well-being, or drive a vehicle only for children;
2. work for a limited range of establishments ('specified places'), with opportunity for contact: e.g. schools, children's homes, childcare premises. Not work by supervised volunteers;

Work under (1) or (2) is regulated activity only if done regularly.

Staff 'Single Central Record'

The Head of Safeguarding maintains a register of all staff working with children in regulated activity. This register complies with Standard 4.2 of the EFL Safeguarding Standards

Volunteers

Volunteers including interns and placements, will undergo checks commensurate with their work at the Club and contact with children. Under no circumstances will a volunteer who has not been appropriately checked, be left unsupervised or be allowed to engage in 'regulated activity'. Volunteers who only work in a supervised capacity, and are not in 'regulated activity', will undergo 'safer recruitment' and DBS checks appropriate to their role.

All requests for DBS clearances are routed via First Advantage 'Know Your People' who are an umbrella body registered with the DBS. All offers of work are subject to the outcome of the screening process and until such time as a satisfactory disclosure certificate has been received and produced, the member of staff will not commence employment.

Positive Disclosures

Should an individual's DBS Disclosure reveal any relevant convictions (in line with the latest legislation Protection of Freedoms Act 2012), the Club will consider whether the nature of the offence/offences renders the person concerned unsuitable for working with children.

In such circumstances, when the nature of any disclosure has to be considered, a risk assessment in line with the Rehabilitation of Offenders Act 1974 will be carried out by the Head of Safeguarding with the Head of Human Resources, along with the relevant Head of Department, to risk assess the information contained within the disclosure certificate.

The applicant may also be asked to attend an interview prior to a recruitment decision being made.

11. HOST FAMILY ACCOMMODATION

Host families are usually arranged when a player's family lives far away from the training facilities. Living nearby makes the players life easier and helps them to achieve their full potential. The Club understands that getting this arrangement right is vitally important for young players and their parents/carers. To achieve this, the following process is to be adopted:

- Cardiff City Football Club will be guided by the principles and scope of the EFL Care and Accommodation Arrangements for Academy Players document
- The hosting of the Club's Academy Under 18 players is deemed to be 'regulated activity'
- A Care and Accommodation Plan will be developed in collaboration with the player, their parent/carer, the host family and the Academy Player Care Manager (PCM). This plan will set out the expectation of each party to the plan
- Hosts are not employees of the Club but will be subject to safer recruitment protocols, including an application form, interview, a self-declaration form, home visits, reference checks and Enhanced Disclosure and Barring Service (DBS) checks
- Hosts will be visited in their homes as part of the recruitment and selection process and an assessment made of the home and accommodation offered
- A Lead Host will be identified as the key contact with the Academy and responsible for the acts and omissions of the members of the Host Family
- The Lead Host and any other household member aged 18 and over will be subject to an Enhanced DBS check with Child Barring List check as a provider of overnight accommodation
- The homestay (house) will be subject to initial and ongoing health and safety risk assessment with an annual check before the start of the new season in July. Landlord certificates (or equivalent) for electric and gas will be obtained
- As part of the Academy's ongoing vigilance, host families will be regularly monitored and visited by the Academy Player Care Manager
- Host Families new to hosting will receive more frequent support visits from the PCM
- The PCM will produce a monthly report on host families which will highlight any issues or concerns, as well as any host family monitoring visits
- Lead Hosts will be given appropriate training and support for their role – this will be organised by the PCM. The training will follow the Club's Workforce Development Plan and the EFL Care and Accommodation Arrangements
- All communication between the Host Family, PCM, player and their parents will be regular through a mutually convenient channel e.g. phone calls, emails or text

Private Fostering

Any potential placement of a child aged under 16 in a host family for 28 days or more may be deemed **Private Fostering** and the Head of Safeguarding needs to be informed in order to make an assessment and inform the Local Authority, as it is a mandatory duty to inform the local authority of children in such arrangements.

12. SAFEGUARDING REPORTING PROCESS

Safeguarding concerns will fall into one of the following types:

- The behaviour of an adult towards a child;
- The behaviour of a young person towards other children including bullying by peers;
- Risks identified through recruitment processes e.g. a positive disclosure;
- Information about an individual provided by statutory agencies or another route;
- Allegations of abuse; or
- Concerns about harm to a child that has taken place outside of a Club activity e.g. at home or school but identified within a Club activity

For members of the Club workforce these concerns may apply to both their professional and personal lives and alleged poor conduct may affect their position in the workplace.

How to Raise a Concern

Safeguarding is everyone's responsibility. Each member of the Club's workforce has a duty to report any concern about a child or adult at risk. Remember – **INACTION IS NOT AN OPTION.**

If there is an immediate risk of harm, a serious injury or a criminal offence committed, the Police or other emergency services must be involved at the earliest opportunity.

Stage 1

If you have a concern of any form of safeguarding poor practice or abuse, raise it first with a member of the Safeguarding Team, who will raise it with the Club Head of Safeguarding. (see Appendix)

Stage 2

If you feel unable to raise the matter with the Safeguarding Team for whatever reason, raise the matter with Club Head of Safeguarding. (see Appendix)

Stage 3

If these channels have been followed and you still have concerns, or if the matter relates to a member of the Safeguarding Team or Club Head of Safeguarding please contact:

The **Safeguarding Manager** at the **EFL** on **01772 325940** or email: safeguarding@efl.com

Cardiff Multi-Agency Safeguarding Hub (MASH) on **02920 536400** (out of hours **02920 788570**)

South Wales Police on **101**

Steps will then be taken to fully investigate the matter to decide what appropriate action should be taken.

The Club is committed to protecting children and young people and will act to uphold this commitment.

What to do if you suspect abuse or poor practice has occurred?

If you are concerned about the welfare of a child or young person or you are concerned about an adult's behaviour towards a child or young person you must act. Do not assume that someone else will help the child. **Safeguarding children is everyone's responsibility.**

It is important that you report your concerns to either one of the following using the contact details in the Appendix:

- Head of Safeguarding
- A Club Designated Safeguarding Officer

What to do if you receive a safeguarding disclosure from a child or young person?

Stage 1

Deal with the disclosure as it happens and ensure that the child or young person's immediate needs are met and that they feel supported. When a disclosure is made, it is most important to understand that you must not investigate the disclosure yourself.

The disclosure must always be taken seriously and dealt with according to the guidance in this Policy, even if the truth of the disclosure is uncertain. You are not expected to act as a social worker, counsellor, judge, jury, or avenge the abuser; you are expected to act in the best interest of the child or young person who may be at risk.

You must:

- **Remain calm**, put your own feelings aside and listen
- **Allow** the child/young person to lead the discussion and to talk freely
- **Use TED** (Tell me, Explain to me, Describe to me) to obtain the relevant information but do not use too many questions
- Let them tell you **at their own pace**. Silences are OK. You do not have to rush to fill in the gaps
- **Record the conversation** accurately and as soon as possible after the disclosure using the words or phrases described by the child or young person
- Accept what the child/young person says without challenge
- **Provide reassurance** that you are taking them seriously and they are doing the correct thing by speaking out

- Never ask questions that may make the child/young person feel guilty or inadequate
- If physical abuse has taken place, you may observe visible bruises and marks but do not ask a child/young person to remove or adjust their clothing to see them. Make a note of the injuries and upload the detail to the body map within the MyConcern platform
- Tell the child/young person that you will be contacting the Club's Head of Safeguarding and Designated Safeguarding Officer and that you will support them throughout
- Respect the confidentiality of the disclosure and do not share the information with anyone other than those who need to know. Those who need to know are those who have a role to play in protecting children/young people

You must not:

- Panic or show that you are shocked;
- Document the conversation whilst the child or young person is disclosing;
- Investigate;
- Give the impression that the child or young person is to blame;
- Ask leading questions;
- Pass judgement on what is being said;
- Make promises of confidentiality;
- Approach the alleged perpetrator

Remember:

When a child/young person discloses they may feel:

- **Guilt:** They may blame themselves for the abuse and often feel guilt for telling
- **Ashamed:** They may feel mortified about the abuse itself
- **Confused:** They may be muddled about their feelings for the alleged abuser
- **Scared:** They may be scared of the repercussions. They may be scared of the alleged abuser

Stage 2

As soon as possible, once the immediate comfort and safety of the child/young person is secured, you must inform a member of the Safeguarding Team of the disclosure using the contact details in the Appendix. You may make a referral yourself directly to a statutory agency if you are concerned about the child/young person's immediate safety and/or are having difficulty contacting a member of the Safeguarding Team or if the perpetrator is a member of the Safeguarding Team.

If this is the case, the Senior Safeguarding Lead/CEO must be informed. Every effort should be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a need to know basis only.

Stage 3

All staff trained in the use of the MyConcern online platform must record a concern which will automatically inform the Head of Safeguarding by email. In the event of a staff member not being able to access My Concern, the Club's Safeguarding Concern Reporting Form (see Appendix) must be completed as soon as possible following the disclosure and email this to the Safeguarding Inbox within 24 hours using email: safeguarding@cardiffcityfc.co.uk

Immediate notes should include:

- Who are you? What is your role? How can the Head of Safeguarding contact you?
- Date and Time of incident
- Place and context of disclosure or concern
- Important facts provided, e.g. names of those involved
- What is the current position regarding those involved?
- Who knows what information? Who informed them?

What happens next?

All concerns are to be followed up and it is everyone's responsibility to ensure that they are. You should be informed by the Club's Head of Safeguarding within 24 hours what has happened following the report being made. If you do not receive this information, you should be proactive in seeking it out.

If you have concerns that the disclosure has not been acted upon appropriately, you should inform the designated Senior Safeguarding Lead/CEO or if unavailable a member of Club's Senior Management, and ultimately contact the relevant statutory agency.

Note:

A disclosure is not the only way that you may be made aware of an issue. Any adult or child may inform you of a concern or a possible abusive situation. There may be an instance when a member of staff has witnessed an incident that may cause concern or be made aware of a concern by a third party. It is important to stress that the same process is to be followed.

Record keeping and Confidentiality.

The Club will record all incidents and concerns directly to the online reporting platform 'My Concern'. In the event of an untrained member of staff wishing to report a concern, the Safeguarding Reporting Form is to be used. All such reports will be taken seriously, carefully recorded, acted upon where appropriate and confidentially retained. The Head of Safeguarding will regularly review reported concerns in order to identify patterns of behaviour that may give rise to concern. All information collected and stored, whether verbal or written, will be treated with the utmost sensitivity and handled in accordance with General Data Protection Regulations notwithstanding the Club's obligations to information share with statutory partners and football authorities.

13. LOW LEVEL CONCERNS

Cardiff City Football Club believes every child, young person and adult at risk who participates our activities should be able to take part in an enjoyable and safe environment and be protected from abuse. This is the responsibility of everyone involved in Club activities. Cardiff City Football Club recognises its responsibility to safeguard the welfare of all children, young people, and adults at risk by seeking to protect them from all forms of neglect and abuse.

Cardiff City Football Club recognises that a critical step to safeguarding is to ensure that all those who work with children, young people and adults at risk in our sport, behave appropriately and that any concerns about an adult's behaviour are identified early and are managed promptly and appropriately.

Cardiff City Football Club aims to create and embed a culture of transparency and confidence within our Club to enable all concerns about an adult's behaviour (including those below the referral threshold) that are below the expected standards and values of our organisation and does not meet the organisational expectations encapsulated within our Safeguarding Policies and Procedures, can be shared responsibly, with the right person, enabling them to be dealt with promptly and appropriately.

The aim of Cardiff City Football Club's Low-Level Concerns Policy is to support a culture that enables staff to feel confident to report any concern, no matter how small.

The full policy can be accessed via the Club website or on request from the Head of Safeguarding.

14. COMPLAINTS PROCEDURE AND WHISTLEBLOWING

Complaints Procedure

Cardiff City Football Club welcomes information from participants, parents and carers in order to improve the overall experience in every area of the Club's activities. This complaints procedure highlights the responsibility of staff at the Club to respond to complaints within three working days of receipt. If a complaint requires additional investigation, the reporting person will be notified of this. All correspondence received is passed to the Head of Human Resources to assess the nature and the extent of each matter before being passed to the relevant Head of Department and in respect of a safeguarding complaint, to the Head of Safeguarding, in order for the appropriate action to take place.

The complaints procedure is monitored by appropriately trained staff from the Club's Fan Engagement Team.

Complaints can be made via the following contact lines:

Email: club@cardiffcityfc.co.uk

Telephone: **033 33 11 1927**

Post: **Cardiff City Football Club, Cardiff City Stadium, Leckwith Road, Cardiff, CF11 8AZ**

The vast majority of supporter and customer complaints are successfully concluded by the Club. However, if a participant is not completely satisfied with the outcome of their complaint, they should refer the matter directly to The Independent Football Ombudsman (IFO). Complaints should be made in writing and emailed to: contact@theifo.co.uk. Complaints may be submitted by post to: The Independent Football Ombudsman, 1-5 Argyle Way, Stevenage, Hertsfordshire SG1 2AD or by telephone on **0330 165 4223**. Further information can be found at their website: 'theifo.co.uk'.

Academy Complaint Policy and Procedure

This policy and procedure is designed to provide a clear and transparent guidance on the way in which the Academy receive and handle complaints and positive feedback, relating to its provision, services, partners, and employees.

Complaints can be made via the following methods:

In person directly to a member of Academy staff

By telephone using Tel: **03333 11 1927**

By email directly into the Academy: academy@cardiffcityfc.co.uk

By post: **Cardiff City Academy, Mendip Road, Llanrumney, Cardiff CF3 4TG**

Whistleblowing

The Club views the reporting of concerns by members of its workforce as a vital element of maintaining its core values. Individuals are strongly encouraged to report incidents of malpractice where the law, Club policy or protocol have been breached by another member of staff.

These reports should be made to the Head of Department who will make every effort to retain confidentiality.

If your concerns relate to the Head of Department, they should be reported to the Head of HR by email: hr@cardiffcityfc.co.uk.

The Whistle Blowing Policy is contained within the Club Employee Handbook. In respect of any safeguarding concerns the afore mentioned reporting process and the 'Reporting a Concern Flowchart' should be followed.

15. MANAGING ALLEGATIONS AGAINST STAFF

It is important that all allegations made against staff are reported immediately to the Head of Safeguarding who will refer the matter to the Head of HR and the Local Authority Designated Officer for Safeguarding. This policy is to be cross referenced with the Club Employee Handbook. A referral to the Affiliated Football Bodies will be made within 24 hours.

When an allegation is made against a member of staff, set procedures must be followed. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen.

A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we must accept that some professionals do pose a serious risk to children and we must act on every allegation.

Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly, and consistently and to be kept informed of its progress. Suspension is an entirely neutral act and may assist the unfettered investigation of concerns. However, it is not the default option and alternatives to suspension will be considered. In some cases, staff may be suspended where this is deemed to be the best way to ensure that both the staff member and children are protected. In the event of suspension, the Club will provide support and a named contact for the member of staff.

It is important to add that the Football Association may impose an interim suspension depending upon the circumstances as reported.

Staff are reminded that publication of material that may lead to the identification of a member of staff who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing, including content placed on social media sites.

Subject to restrictions on the information that can be shared, the Head of Department should, as soon as possible, inform the member of staff about the nature of the allegation, how enquiries will be conducted and the possible outcome (e.g. disciplinary action and/or referral to the Disclosure and Barring Service or regulatory body).

The member of staff should:

- Be treated fairly and honestly and helped to understand the concerns expressed and processes involved;
- Be offered appropriate sources of support;
- Be kept informed, at agreed times, of the progress and outcome of any investigation and the implications for any disciplinary or related process;
- If suspended, be kept up to date about events in the workplace

Non-Recent Allegations

All allegations concerning staff who are no longer employed at the Club, or allegations of non-recent abuse or poor practice must be reported to the Head of Safeguarding who will refer the matter to the Cardiff and Vale Safeguarding Board and the Police if necessary. This process is to be adopted even if it is established that the alleged perpetrator of the abuse/poor practice is deceased.

16. REPORTING PROCEDURE FOR THE HEAD OF SAFEGUARDING

The Club and its staff are not experts in child protection and will refer issues to appropriate agencies. Upon being notified of an allegation of abuse against a member staff:

- The Head of Safeguarding will require a comprehensive report completed on My Concern or if untrained in its use, a written factual statement using the Safeguarding Concern Reporting Form from the person making the report which must be signed and dated accordingly.
- If any statement has been made by the child, this should be reported in the child's own words. These reports should be confined to facts and should not include any opinion, interpretation or judgement
- If the report involves an allegation about a member of staff, this will be referred to the Designated Officer for Safeguarding at Cardiff Children's Social Care within 24 hours or as soon as practicable
- Otherwise, if abuse is suspected, the Head of Safeguarding will contact Children's Social Care where the incident occurred or where the child lives. Children's Social Care may involve the police
- The Head of Safeguarding will notify the FA Safeguarding Team, the English Football League and the Football Association of Wales using the Affiliated Football Referral Form within 24 hours or as soon as practicable
- The Head of Department, the Head of Communications and the Head of HR will be informed of the referral
- The parents/carers of the child will be contacted as soon as possible following advice from Children's Social Care or the Police
- The Designated Safeguarding Officer or line manager will ensure that any child concerned is immediately removed from any possible risk of harm
- Once Children's Social Care has been informed and the incident accepted as a referral or notification, the Head of Safeguarding will notify the Club's Chief Executive Officer and Senior Safeguarding Lead in writing
- All information will be dealt with confidentially and shared only with the people on a need-to-know or who-must-know basis
- If the Head of Safeguarding is implicated, the Club's Chief Executive Officer and Head of HR should be contacted who will inform Children's Social Care in line with the procedure in this section.

17. 'MYCONCERN' ONLINE REPORTING PLATFORM

The MyConcern safeguarding software is an electronic recording system which enables members of staff in educational and sport establishments or other trusted users to record and update safeguarding concerns. The system allows Designated Safeguarding Leads such as the Head of Safeguarding and Designated Safeguarding Officers to case manage incidents, produce data reports and access all relevant data for their establishment.

The Club holds a stand-alone policy which sets out advice and guidance on the use of the system in an educational and sport setting and complies with the statutory guidance 'Social Services and Well-being (Wales) Act 2014' and 'Keeping Learners Safe 2023' and the EFL Safeguarding Standards.

All staff in 'regulated activity' will be trained in its use as 'trusted users'.

18. STAFF TRAINING

It is important that staff receive training and awareness to enable them to recognise the possible signs of abuse, neglect and exploitation and to know what to do if they have a concern.

Staff should be aware of systems within the Club which support safeguarding.

This includes:

- The Club's **Safeguarding Children Policy** and **Procedures**
- **Safer Working Practice**
- The details of the **Head of Safeguarding** and the team of **Designated Safeguarding Officers**

All staff members should also receive appropriate safeguarding information which is regularly updated. The minimum being:

For staff working with children in Regulated Activity:

- The FA Safeguarding Children Course or recertification every two years.
- The EFL Safeguarding in Sport online module every three years
- Annual Safeguarding CPD Presentation

For other staff working with children in a position of authority and trust:

- appropriate safeguarding information and/or training annually;

For all other staff:

- Safeguarding awareness through safeguarding emails and other communications.

Staff are responsible for maintaining their certificates and ensuring that their safeguarding training, first aid and criminal records checks are updated.

New Staff

All new members of staff will undergo an induction that includes familiarisation with the Club's safeguarding policy and safe working practices on their activities, as well as identification of their respective training needs. They will be provided with the EFL Guide to Safer Working Practices.

We will also work with players and parents to raise awareness of safeguarding issues that may affect them e.g. social media issues.

Supply staff and other visiting staff working with children

Workers in this group will be provided with the EFL Guide to Safer Working Practice document. All staff will be made aware of the increased vulnerability and risk of abuse of certain groups, including disabled and SEN children, a child who's looked after and young carers.

Visitors with a professional role, such as social worker or members of the Police will have been vetted by their own organisation. Any professionals visiting the Club should provide evidence of their professional role and employment details (an identity badge for example). If felt necessary, the Club can also contact the relevant organisation to verify the visitor's identity.

19. PHOTOGRAPHY AND IMAGES

During the course of our activities it is foreseeable that a child's image may be captured by appointed photographers in digital photographs and in film. These images may then be used by Club staff and contractors in both internal and external news and marketing publications and on-line via websites and social media.

Video or Photographs as a Coaching or Management Aid

The recording of training or match footage is a legitimate coaching aid and as such parents and players are made aware that this is part of the coaching programme. Similarly photographs of matches or players for management purposes (e.g. ID passes or databases) are regularly taken. Both these types are covered by data protection law. As such all those responsible for the recording of this footage must:

- Adhere to this policy;
- Take responsibility for the safe storage and distribution of the images;
- Give due consideration to the dignity and protection of the players involved; and
- Inform parents where there are changes to the planned use of the footage which will lead to a wider distribution of the images than originally anticipated

Consent

Where an activity may allow for the capture, and thus use, of a participant's image, the person responsible must develop appropriate documentation (forms and guidance) and associated processes to allow for the management of parental consent (or participant consent in respect of an adult at risk) and ensure that those individuals understand what they are consenting to and why. Consent must provide a genuine choice in order to be valid.

Legitimate Interest

When images are taken for identification or coaching purposes, consent is not normally the appropriate condition for capturing and using such images in this way. Parents and children must be aware that images are being used in this way. Should parents or children have any issues arising out of images being processed for the Club's legitimate interests they may contact our **Data Protection Officer** on email: dpo@cardiffcityfc.co.uk. Details of all processing activities are documented in the Club's privacy notices available from the Club website.

Opt Out

Other than on match / public event days (see below), individuals have the right to opt-out (i.e. revoke or not give consent) of being photographed or object to their image being used as part of a legitimate interest. The workforce will endeavour to make suitable arrangements to apply any restrictions required whilst also minimising the disruption to normal Club activities. These arrangements will be agreed in advance with those with guardianship or parental responsibility for the individual and must uphold the dignity of the participant opting out.

Storage

All images, whilst held by the Club, will be securely stored on the Club's IT systems and remain the property of the Club at all times. Where footage is passed to players and parents for training and development purposes this must not be passed on further or published without the written permission of the Club's management staff. Families must be made fully aware of this restriction at the point of distribution.

Where consent has not been given but images have been captured, those images should follow the guidelines shown below but also should be of a general nature capturing the activity and not the individual and should not use children's names in resulting public use.

Match Day, Public Events, Incidental Image Capture & Consent

Large crowds may create further questions with consent and image use. At events such as matches, concerts and special public events, explicit consent is not required as there is a reasonable expectation that any person attending may have their image captured or broadcast. In any situations where children may be subject to 'incidental image capture' (i.e. they are in the background behind a main subject), where practical they should be informed that they may be on camera and have the opportunity to opt out.

Where a person finds that their image or that of their child has been used in these circumstances and they do not wish it to be used then we will endeavour to remove it from circulation where it is practical to do so and where there are reasonable grounds to do so.

Parents, Other Children and Other Photographers

The Club strictly forbids any photographs to be taken at Academy or Womens and Girls training and/or matches involving players under the age of 18, unless taken by official Club or third party commissioned staff.

Where a member of staff or child/parent has a concern about the capture and use of images they should report immediately to the activity manager or the Head of Safeguarding.

With the advent of smart phones with digital cameras and instant connectivity to the world wide web, the scope for the capture and sharing of images has increased dramatically and as such activity managers should take care to apply the policy firmly and fairly.

In general, members of the workforce capturing images **must not**:

- Using own/personal equipment to capture images of participants;
- Capture images taken in changing rooms or where children are not fully clothed;
- Use images of children who wish not to be in the photograph or whose parent does not wish them to be;
- Use images where children are more vulnerable – upset, injury, illness;
- Use images that are sexually suggestive or provocative; or
- The inclusion of young player's full names in any captions, kit or reports

Matchday photography

Children attend games as spectators. Images of children may appear as part of the crowd on matchdays and be reproduced in official Cardiff City Football Club promotional material and appear in the public domain. The Club's terms and conditions of ticket purchase and standard ground regulations state that images may be taken of fans within the crowd and used in promotional material. Ticket holders agree to these conditions when purchasing a ticket.

Any queries on promotional material featuring a child/children should be addressed to the **Head of Safeguarding** who can be contacted by email: safeguarding@cardiffcityfc.co.uk

The Club accepts no liability for non-Cardiff City images and reserves the right to prohibit the use of any photography, video or film on its activities or premises. This includes match days. There is to be no non-Cardiff City photographs or images being taken at Academy training or matchdays.

20. SOCIAL MEDIA AND E-SAFETY

Children increasingly use electronic equipment on a daily basis to access the internet and share content and images via social networking sites such as Facebook, Twitter, Snapchat and Instagram.

Unfortunately, some adults and young people will use these technologies to harm children. The harm might range from sending hurtful or abusive texts and emails, to grooming and enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings.

Children may also be distressed or harmed by accessing inappropriate websites that promote unhealthy lifestyles, extremist behaviour and criminal activity.

The Club's Safeguarding and Social Media Policy explains the professional boundaries expected between staff, children and their parents/carers.

Cyberbullying and Sexting

Cyberbullying and **sexting** by children on Club activities will be treated as seriously as any other type of bullying and will be managed through our Anti-Bullying procedures.

Serious incidents, such as **sexting** and **peer-on-peer abuse** will be managed in line with our safeguarding procedures and the guidance from UK Council for Internet Safety (UKCIS): Sexting in schools and colleges, responding to incidents, and safeguarding young people (2017).

Many children own or have access to handheld devices and the Club encourages parents and carers to keep their children safe when using the internet and social media at home and in the community by promoting the e-safety campaign Safer Internet Day.

As a general rule, children are not allowed to take images on Club activities, in particular images are prohibited in private areas such as: toilets, changing rooms, showers and bedrooms and when other children are in a state of undress.

Child Exploitation Online Protection (CEOP)

CEOP is a command of the National Crime Agency and is dedicated to tackling the sexual abuse and exploitation of children and young people. CEOP helps children and young people under the age of 18 who have been forced or manipulated into taking part, or are being pressured to take part, in sexual activity of any kind. This can be both online and offline. The CEOP Safety Centre offers information and advice for children and young people, parents and carers and professionals. You can visit the CEOP Safety Centre and make a report directly to CEOP by clicking the Click CEOP button below.

The Club Head of Safeguarding is a CEOP Ambassador and will work with children and young people and their parents and carers, to keep them safe on-line. The Club recommends the use of CEOP's education resources that can be accessed from the following link:

www.ceopeducation.co.uk/

CEOP helps any child or young person under the age of 18 who is being pressured, forced or tricked into taking part in sexual activity of any kind. This can be something that has taken place either online or in 'the real world', or both. The CEOP Safety Centre has clear information and advice on what can be reported to CEOP, the reporting process and what will happen if you do decide to make a report. You can visit the CEOP Safety Centre and make a report directly to CEOP by clicking the Click CEOP button.



If you are experiencing online bullying or something else online has worried you please speak to a member of the **Club Safeguarding Team** or to an adult you trust, or you can talk to Childline at any time on **0800 1111** or at www.childline.org.uk.

Staff

Any communication using ICT (Information Communication Technology) by staff should be carried out using Club IT, e.g. mobile phone and Club email address. This ensures that Club policies, firewall/filters and security apply.

It is important for staff to maintain professional and personal boundaries in and out of work:

- Staff should not have direct personal communication with children from Club activities using ICT, e.g. email, mobiles (unless an approved arrangement is in place)
- On all social media, any requests from children or their parents/carers should be rejected
- Concerns arising from contact on social media from children should be directed to a Safeguarding Officer or the Head of Safeguarding. This will help to avoid blurring boundaries between personal and professional life
- Staff should take care on how they present themselves in the public domain (e.g. internet, media) and their association with Cardiff City Football Club
- Staff should use a disclaimer on social media with wording such as *'these views are my own views and not those of the Club'*
- Staff should direct any queries/clarification on this to the Head of Communications or the Head of Safeguarding

As a general policy, communication with children age under 16 is via the Club through the parent/carer or school/organisation. However, the Club recognises that direct communication with young people may be required on certain activities for professional and welfare purposes and in such circumstances the Designated Safeguarding Officer and Head of Safeguarding should be consulted, and protocols put in place and appropriate consent obtained from the parent/carer.

Filtering

Cardiff City Football Club has an appropriate filtering system that manages the following content: discrimination; drugs/substance misuse; extremism; malware hacking; pornography; piracy and copyright; self-harm; violence and gambling. This includes the Academy setting at all sites and the WIFI settings for Academy visitors (including parents/carers and children). Cardiff City Stadium does not allow public access to its WIFI system however offers the same protection to its users during Club or Private use of its network.

- The system meets the expectations laid out in the Club's Information Security Policy
- Any online concerns are to be reported to the Designated Safeguarding Officer for the department or the activity lead

21. TYPES OF ABUSE AND NEGLECT

Types of Abuse	Physical Signs	Behavioural Signs
Physical Abuse	Physical signs such as unexplained and unusual bruising, finger and strap marks, injuries, cigarette burns, bite marks, fractures, scalds, missing teeth.	Behavioural signs such as fear of contact, aggression, temper, running away, fear of going home, reluctance to change or uncover body, depression, withdrawal, bullying or abuse of others.
Neglect	Physical signs such as constant hunger, ill-fitting or inappropriate clothes, weight change, untreated conditions, continual minor infections, failure to supply hearing aids, glasses and or inhalers.	Behavioural signs such as always being tired, early or late, absent, few friends, regularly left alone, stealing, no money, parent or responsible person not attending or supportive.
Sexual Abuse	Physical signs such as genital pain, itching, bleeding, bruising, discharge, stomach pains, discomfort, pregnancy, incontinence, urinary infections or STDs, thrush, anal pain on passing motions.	Behavioural signs such as apparent fear of someone, nightmares, running away, sexually explicit knowledge or behaviour, masturbation, bed-wetting, eating problems, substance abuse, unexplained money or gifts, acting out with toys, self-harm.
Bullying	Physical signs such as weight change, unexplained injuries and bruising, stomach and headaches, bed-wetting, disturbed sleep, hair pulled out.	Behavioural signs such as difficulty making friends, anxiety over school, truancy, withdrawn, anger, moodiness, suicide attempts, reduced performance, money and possessions reported as lost, stealing from within the family, distress and anxiety on reading texts or e-mails.
Emotional Abuse	Physical signs such as weight change, lack of growth or development, unexplained speech disorders, self-harm, clothing inappropriate for child's age, gender or culture etc.	Behavioural signs such as unable to play, fear of mistakes, fear of telling parents, withdrawn, unexplained speech and language difficulties, few friends.
Radicalisation	Physical signs such as they are observed downloading, viewing or sharing extremist propaganda from the web. They may change their appearance, their health may suffer (including mental health) and they may become isolated from family, friends, peers or social groups.	They become withdrawn and focused on one ideology. They express a desire/ intent to take part in or support extremist activity. Their views become increasingly extreme regarding another section of society or government policy. An individual becomes increasingly intolerant of more moderate views.

<p>Financial Abuse</p>	<p>Physical signs such as stress, worry and suffering from neglect are prevalent, not every time when dealing with children. Children may be asked to withdraw money from their accounts or obtain credit in their name on behalf of someone else. Children may also be asked to hand over control of their accounts which may include the change of 'log in' details. It may become evident that a child is punished for spending their own money.</p>	<p>Children may state to others that they have a credit report. They may also complain of their personal possessions being missing. They may offer an explanation of no financial support as to their lack of nourishment and development. It may manifest itself in their reluctance to join activities with other children, certainly if this requires money to participate. They may not have access to their own money.</p>
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22. SPECIFIC SAFEGUARDING CONCERNS

Bullying & Cyber-Bullying

Bullying and cyberbullying can happen to any child. Cardiff City Football Club pledges to help keep children safe from bullying, wherever it happens. For further information, please refer to the Club Anti-Bullying Policy.

What is Bullying?

Bullying is behaviour that hurts someone else. It includes name calling, hitting, pushing, spreading rumours, threatening or undermining someone.

It can happen anywhere – at Club activities, at school, at home or online. It's usually repeated over a long period of time and can hurt a child both physically and emotionally.

Bullying can take different forms. It could include:

- Physical bullying: hitting, slapping or pushing someone
- Verbal bullying: name calling, gossiping or threatening someone
- Non-verbal abuse: hand signs or text messages
- Emotional abuse: threatening, intimidating or humiliating someone
- Exclusion: ignoring or isolating someone
- Undermining, constant criticism or spreading rumours
- Controlling or manipulating someone
- Making silent, hoax or abusive calls
- Racial, sexual or homophobic bullying
- Bullying someone because they have a disability

What is Cyberbullying?

Cyberbullying is bullying that takes place online. Unlike bullying in the real world, online bullying can follow the child wherever they go, via social networks, gaming and mobile phone.

Cyberbullying can include:

- 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 from online games, activities or friendship groups
- Shaming someone online
- Setting up hate sites or groups about a particular child
- Encouraging 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 young person or cause trouble using their name
- Sending explicit messages, also known as sexting
- Pressuring children into sending sexual images or engaging in sexual conversations.

Signs of bullying

No single sign will indicate for certain that your child's being bullied, but watch out for:

- Belongings getting 'lost' or damaged
- Physical injuries, such as unexplained bruises
- Being afraid to go to school, being mysteriously 'ill' each morning, or skipping school
- Not doing as well at school
- Asking for, or stealing, money (to give to whoever's bullying them)
- Being nervous, losing confidence, or becoming distressed and withdrawn
- Problems with eating or sleeping
- Bullying others

Effects of bullying

The effects of bullying can last into adulthood. At its worst, bullying has driven children and young people to self-harm and even suicide.

Children who are bullied:

- May develop mental health problems like depression and anxiety
- Have fewer friendships
- Aren't accepted by their peers
- Are wary and suspicious of others
- Have problems adjusting to school, and don't perform as well
- All children who are affected by bullying can suffer harm – whether they are bullied, they bully others, or they witness bullying

Who's at risk

Any child can be bullied for any reason. If a child is seen as different in some way or seen as an easy target they can be more at risk.

This might be because of their:

- Race or ethnic background
- Gender
- Sexual orientation.

Or it could be because they:

- Appear anxious or have low self-esteem
- Lack assertiveness
- Are shy or introverted

Popular or successful children are also bullied, sometimes because others are jealous of them. Sometimes a child's family circumstance or home life can be a reason for someone bullying them.

Disabled children can experience bullying because they seem an easy target and less able to defend themselves.

Reporting Bullying

The concern reporting process is detailed in Part 11 of this document. Cardiff City Football Club will take all reports of bullying, discrimination and harassment seriously and adopt the appropriate process to ensure the reporting person is protected from repeat behaviour.

Cardiff City Football Club is a supporter of the annual Anti-Bullying Week facilitated by the Anti-Bullying Alliance.

You may also wish to access any of the following websites designed to give advice and guidance to parents and children who are faced with dealing with bullying:

Guidance for parents/carers

www.anti-bullyingalliance.org.uk

www.stonewall.org.uk

www.kickitout.org

Guidance for young people and adults at risk

www.anncrafttrust.org/help-advice/

www.kickitout.org

www.childline.org.uk

Contextual Safeguarding

As well as threats to the welfare of children from within their families, children may be vulnerable to abuse or exploitation from outside their families. These extra-familial threats might arise at school and other educational establishments, from within peer groups, or more widely from within the wider community and/or online. These threats can take a variety of different forms and children can be vulnerable to multiple threats, including exploitation by criminal gangs and organised crime groups such as county lines; trafficking, online abuse; sexual exploitation and the influences of extremism leading to radicalisation. Extremist groups make use of the internet to radicalise and recruit and to promote extremist materials. Any potential harmful effects to individuals identified as vulnerable to extremist ideologies or being drawn into terrorism should also be considered.

Assessments of children in such cases should consider whether wider environmental factors are present in a child's life and are a threat to their safety and/or welfare. Children who may be alleged perpetrators should also be assessed to understand the impact of contextual issues on their safety and welfare. Interventions should focus on addressing these wider environmental factors, which are likely to be a threat to the safety and welfare of a number of different children who may or may not be known to local authority children's social care. Assessments of children in such cases should consider the individual needs and vulnerabilities of each child. They should look at the parental capacity to support the child, including helping the parents and carers to understand any risks and support them to keep children safe and assess potential risk to child.

Child Sexual Exploitation

“Child sexual exploitation (CSE) is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.”

(New definition of CSE from Department of Education & Home Office, February 2016)

What marks out exploitation is an **imbalance of power in the relationship**. Sexual exploitation involves varying degrees of **coercion, intimidation or enticement**, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. A common feature of sexual exploitation is that the child often does not recognise the coercive nature of the relationship and does not see themselves as a victim. All staff should be aware of the indicators of sexual exploitation and all concerns or suspicions must be reported. It may also be linked to **child trafficking**. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse. The child may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

Female Genital Mutilation (FGM)

There are a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person.

Victims of FGM are likely to come from a community that is known to practice FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

High Risk Time: This procedure often takes place in the summer, as the recovery period after FGM can be 6 to 9 weeks.

High Risk Groups: FGM affects girls particularly from north African countries, including Egypt, Sudan, Somali, Kenya, Ethiopia, Sierra Leone, Nigeria, Eritrea, Yemen, Indonesia and Afghanistan.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM and any concerns of FGM **must be reported**.

Indicators

Before FGM happens:

A girl at immediate risk of FGM may not know what’s going to happen, but she might talk about:

- Being taken ‘home’ to visit family a special occasion to ‘become a woman’
- An older female relative visiting the UK
- She may ask a teacher or another adult for help if she suspects FGM is going to happen or she may run away from home or miss school

Signs and Symptoms:

A girl or woman who has had FGM may:

- Have difficulty walking, sitting or standing
- Spend longer than normal in the bathroom or toilet
- Display unusual behaviour after an absence from school or college
- Be particularly reluctant to undergo normal medical examinations
- Ask for help but may not be explicit about the problem due to embarrassment or fear

Radicalisation

Protecting vulnerable groups from the risk of radicalisation is part of the wider safeguarding duties and similar in nature to protecting children from other forms of harm (e.g. gangs, sexual exploitation). During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised.

What is 'Radicalisation'?

Radicalisation is a term that refers to a **process** by which a person comes to support terrorism and forms of extremism leading to terrorism. During that process, it is possible to intervene to prevent vulnerable people being drawn into terrorist-related activity.

Radicalisation is also described as the process where someone has their vulnerabilities or susceptibilities exploited towards crime or terrorism - often by a third party who have their own agenda.

Who is vulnerable?

Factors associated with a person who becomes vulnerable to being drawn into terrorism include:

- Peer pressure
- Influence from other people
- Bullying
- Crime and anti-social behaviour
- Lack of self-esteem or identity
- The internet
- Race or hate crime
- Personal or political grievances
- Family tensions

Some people (children or adults) more vulnerable to radicalisation include those who may be isolated/ marginalised in society (e.g. through mental health or learning disability) and have no one to turn to.

Signs of someone 'at risk'

In the early stages, someone may talk a lot about a new friend. You may notice the person is 'out of character' or notable changes in behaviour or mood - a cluster of signs, such as:

- Changes dress/appearance, behaviour,
- Language and peer relationships;
- Secretive behaviour;
- Losing interest in friends and activities;

- Showing sympathy for extremist causes;
- Glorifying violence;
- Possessing illegal or extremist literature

The person may have a misguided view and may need intervention.

APPENDICES

A. GLOSSARY

- **Physical abuse:** Any deliberate act causing injury or trauma to another person, for example, hitting, slapping, pushing, kicking, burning, giving a person medicine that they do not need and/or that may harm them or application of inappropriate restraint measures.
- **Emotional abuse:** Any act or other treatment which may cause emotional damage and undermine a person's sense of wellbeing, including persistent criticism, denigration or putting unrealistic expectations on Children and Adults at Risk, isolation, verbal assault, humiliation, blaming, controlling, intimidation or use of threats.
- **Sexual abuse:** Any act which results in the exploitation of Children and Adults at Risk, whether with their consent or not, for the purpose of sexual or erotic gratification. This includes non-contact activities, such as indecent exposure, involving Children and Adults at Risk in witnessing sexual acts, looking at sexual images/pornography or grooming them in preparation for abuse (including via the internet). Whilst legally Children aged sixteen have reached the age of consent for sexual activity, it is unacceptable for any member of Staff to abuse their relationship of trust for sexual gratification.
- **Neglect:** Ongoing failure to meet the basic needs of Children and Adults at Risk. Neglect may involve failing to provide adequate food or shelter including exclusion from home or abandonment, failing to protect them from physical and emotional harm or danger or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, basic emotional needs. In an Activity setting, it may involve failing to ensure that Children and Adults at Risk are safe and adequately supervised or exposing Children and Adults at Risk to unnecessary risks.
- **Financial Abuse:** 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. This category will be less prevalent for a child but indicators could be:
 - not meeting their needs for care and support which are provided through direct payments; or complaints that personal property is missing.
- **Adult at Risk** means any person aged eighteen or over who has needs for care and support (whether or not the local authority is meeting any of those needs) and is experiencing, or at risk of, abuse or neglect and 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. This may include people with learning disabilities, sensory impairments, mental health needs, older people and people with a physical disability or impairment. It may also include people who are affected by the circumstances that they are living in, for example, experiencing domestic violence (this list is not exhaustive). An individual's level of vulnerability to harm may vary over time depending on the circumstances they are in and their needs at that time.
- **Bullying:** Repeated behaviour intended to intimidate or upset someone and/or make them feel uncomfortable or unsafe, for example, name calling, exclusion or isolation, spreading rumours, embarrassing someone in public or in front of their peers, threatening to cause harm, physically hurting someone or damaging their possessions.
- **Child, Children or Young Person** means any person or persons under the age of eighteen.
- **Child criminal exploitation (CCE):** Occurs when a child under the age of 18 years is involved in criminal activities including the movement of drugs or money which results in personal gain for an individual, group or organised criminal gang. It involves an element of exchange and can still be exploitation even if the activity appears consensual. CCE involves force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence. It is

typified by some form of power imbalance in favour of those perpetrating the exploitation.

- **Child sexual exploitation (CSE):** A specific form of child sexual abuse. It occurs where an individual or groups of people take advantage of an imbalance of power to coerce, manipulate or deceive a Child into sexual activity in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. The victim may be sexually exploited even if the sexual activity appears consensual. Child sexual exploitation can also take place through the use of technology.
- **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. County line gangs pose a significant threat to Children and Adults at Risk upon whom they rely to conduct and/or facilitate such criminality.
- **Cyberbullying:** The use of technology to harass, threaten, embarrass, humiliate, spread rumours or target another person. By definition, it occurs among Children. When an adult is the victim, it may meet the definition of cyber harassment or cyberstalking.
- **Discriminatory abuse and bullying:** Abusive or bullying behaviour because of discrimination occurs when motivated by a prejudice against certain people or groups of people. This may be because of an individual's ethnic origin, colour, nationality, race, religion or belief, gender, gender reassignment, sexual orientation or disability. Bullying behaviour may include unfair or less favourable treatment, culturally insensitive comments, insults and 'banter'.
- **Domestic violence:** Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged sixteen or over, who are or have been intimate with partners or family members regardless of gender or sexuality. This can encompass but is not limited to psychological, physical, sexual, financial, emotional abuse and so called 'honour' based violence. Honour based abuse is a collection of practices used to control behaviour within families in order to protect perceived cultural and religious beliefs and/or honour.
- **Female genital mutilation (FGM):** Involves procedures that intentionally alter or injure female genital organs for non-medical reasons. The procedure has no health benefits for girls and women. The Female Genital Mutilation Act makes it illegal to practise FGM in the UK or to take girls who are British nationals or permanent residents of the UK abroad for FGM whether or not it is lawful in another country.
- **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.
- **Hazing:** Any rituals, initiation activities, action or situation, with or without consent, which recklessly, intentionally or unintentionally endangers the physical or emotional well-being of Children and Adults at Risk.
- **Infatuations:** Children and Adults at Risk may develop an infatuation with a member of Staff who works with them. Such situations should be handled sensitively to maintain the dignity and safety of all concerned. Staff should be aware that in such circumstances, there is a high risk that words or actions may be misinterpreted and that allegations could be made against Staff. Staff should therefore ensure that their own behaviour is above reproach. A member of Staff who becomes aware that a Child or Adult at Risk may be infatuated with him/her, or with a colleague, should discuss this at the earliest opportunity with a member of the Safeguarding Team.
- **Peer-on-peer abuse:** Children and Adults at Risk can be taken advantage of or harmed by their peers. Peer-on-peer abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between individuals and within relationships (both intimate and non-intimate).

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

B. GUIDANCE RELATING TO CHILD PROTECTION

The impact of child abuse, neglect and exploitation should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach, and the rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

Recognising abuse

To ensure that children are protected from harm, staff need to understand what types of behaviour constitute abuse and neglect.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone, or leaving knives or matches within reach of an unattended toddler. Abuse may be committed by adult men or women and by other children and young people.

Children who may be particularly vulnerable

All children must receive the highest standards of protection. Special consideration must be given to children who are:

- Disabled or special educational needs (SEN Code of Practice)
- Young carers
- Affected by parental substance misuse, domestic violence or parental mental health
- Asylum seekers
- Living away from home (short and long term)
- Vulnerable to being bullied, or engaging in bullying
- Transient lifestyles
- Living in chaotic and unsupportive home situations
- Vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality and at risk of sexual exploitation
- Do not have English as a first language
- At risk of female genital mutilation (FGM)
- At risk of forced marriage
- At risk of being drawn into extremism

This list provides examples of additionally vulnerable groups who are at risk of abuse or whose exploitation is increased - it is not exhaustive.

Special consideration includes the provision of safeguarding information and resources in accessible formats and language for children with communication needs.

Child Looked After / Children in Care

The most common reason for children becoming looked after is as a result of abuse or neglect. Staff should have extra vigilance to keep a child looked after safe and the Safeguarding Team should be informed of activities involving them. The activity lead should have details of the child's social worker and the name and contact details of the social worker, along with escalation contacts when people are not contactable (e.g., out of hours, on leave/half term or holiday periods, in meetings). It may be necessary for staff to have information about a child's 'looked after' legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child.

Grooming

Grooming is when someone builds an emotional connection with an individual to gain their trust for the purposes of abuse or exploitation.

Many children or other vulnerable people don't understand that they have been groomed, or that what has happened is abuse. Grooming happens both online and in person. Groomers will hide their true intentions and may spend a long time (this could be years) gaining an individual's trust. They may also try to gain the trust of the whole family so they can be alone with the person.

Grooming activity may include:

- Offering advice or understanding
- Buying gifts
- Giving the child attention
- Using their professional position or reputation
- Taking them on trips, outings or holidays
- Using secrets and intimidation to control children

Once they have established trust, groomers will exploit the relationship by isolating the individual from friends or family and creating a dependent relationship. They will use any means of power or control to make the individual believe they have no choice but to do what they want.

Groomers may introduce 'secrets' as a way to control or frighten the individual. Sometimes they will blackmail them, or make them feel ashamed or guilty, to stop them telling anyone about the abuse.

C. GUIDANCE RELATING TO CHILD ABUSE AND NEGLECT

Child welfare concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. Children may be abused in a family, in an institutional or community setting, by those known to them or by a stranger, including, via the internet. Abuse and neglect can happen over a period of time but can also be a one-off event.

Child abuse commonly occurs within **relationships of trust or responsibility** (including parents/carers) and is always an **abuse of power/position/authority or a breach of trust**.

Facts

- Children living away from home are vulnerable to abuse
 - Children are also abused by other young people and, on occasion, by young children
 - Abuse can happen to a child regardless of their age, gender, race, ability or class
 - Mal-practice can contribute and sustain an environment where abuse can occur
 - A person may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm
- Children and young people often find it very difficult to talk about the abuse they are experiencing. So, adults have a vital role to play in looking out for the possible signs, including a **sudden and noticeable change of behaviour**.

The warning signs and symptoms of child abuse and neglect can vary from child to child.

- Disabled children may be especially vulnerable to abuse, because they may have an impaired capacity to resist or avoid abuse. They may have speech, language and communication needs which may make it difficult to tell others what is happening
- Child development: Children also develop and mature at different rates so what appears to be worrying for a younger child might be normal behaviour for an older child
- Parental behaviours may also indicate child abuse or neglect. This could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health. It is important to recognise that a warning sign doesn't automatically mean a child is being abused

Warning Indicators

A noticeable change in the child's or young person's behaviour or appearance is an indicator. Recognising abuse may be a cluster of symptoms or repeating patterns. Here are a few example signs that would raise concern:

- Notable changes in behaviour or character, such as aggression or withdrawal;
- Severe/unexplained bruising or burn marks or scalds
- Inadequate or inappropriate clothing for child's size, weather or time of year;
- Sleeping disorders or bed wetting in children aged 9+ through to teens;
- Reluctance to remove clothing for activities: arms and legs covered to hide bruises/marks;
- Persistently dirty with body odour / smearing;
- Inappropriate sexualised behaviour or words for the age of child (e.g. "You're so fit Sir/Miss);
- Drawings/doodling of sexually explicit conduct – in particular where it is traced over heavily;

- Self harming (in particular around hidden areas such as back of legs, arms) and eating disorders
- Children who talk about running away;
- Children who drink alcohol regularly from an early age;
- Children who are concerned for younger siblings without explaining why;
- Parents who are dismissive and non-responsive to practitioners' concerns;
- Parents who collect their children from school when drunk, or under the influence of drugs;

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the Head of Safeguarding to decide how to proceed.

It is very important that staff report their concerns – they do not need ‘absolute proof’ that the child is at risk.

D. PREVENT GUIDANCE

The Prevent Agenda was set up as part of the Government's wider counter-terrorism strategy called CONTEST. It is a UK-wide strategy that aims to stop people becoming terrorists or supporting terrorism.

The strategy's three objectives are:

- To tackle the ideological causes of terrorism.
- To intervene early to support people susceptible to radicalisation.
- To enable people who have already engaged in terrorism to disengage and rehabilitate.

Cardiff City Football Club has a legal duty to prevent those participating in a learning environment from being drawn into extremism and radicalisation. The Club, in conjunction with its education providers and statutory partners, conducts an annual Prevent Self-Assessment and Action Plan. This supports the Club's commitment to its Equality Policy and overarching duty to protect all persons involved in Club activities as staff, volunteers or participants.

What is Radicalisation?

Radicalisation is a term that refers to a process by which a person comes to support terrorism and forms of extremism leading to terrorism. During that process, it is possible to intervene to prevent vulnerable people being drawn into terrorist-related activity.

Radicalisation is also described as the process where someone has their vulnerabilities or susceptibilities exploited towards crime or terrorism - often by a third party who have their own agenda.

What is Extremism?

Vocal or active opposition to fundamental British Values including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

What are British Values?

Democracy – Over 18-year olds can vote in local and general elections.

The Rule of Law – We understand the importance in having laws which protect us and know the consequences of breaking laws and rules.

Tolerance of those of different faiths and beliefs – We are part of a culturally diverse society

Individual liberty – We have the freedom to make choices about leisure activities we take part in

Mutual Respect – We treat each other with respect.

The Cardiff City Football Club apprenticeship programme is part funded by the European Social Fund through Welsh Government.

The Quality Skills Alliance (QSA), who deliver the apprenticeship, is a unique consortium of work-based learning providers working together to develop excellence in apprenticeships. Cardiff and Vale College (CAVC) is the Lead provider of the Cardiff City apprenticeship programme.

What makes someone at risk of radicalisation?

The following factors have been identified as increasing an individual's risk of radicalisation:

- Struggling with a sense of identity
- Questioning their place in society
- Family issues
- Experiencing a traumatic event
- Experiencing discrimination
- Difficulty in interacting socially and lacking empathy
- Difficulty in understanding the consequences of their actions
- Low self-esteem

How to Spot the Signs of Radicalisation

There is no single pathway towards radicalisation – it is usually a combination of behaviours that are different to each person, according to their personal vulnerabilities

The following behaviours could be an indication that an individual is becoming radicalised:

- Ignoring or demonising viewpoints that contradict their own
- Expressing themselves in an 'us vs. them' manner about others who have alternative beliefs,
- Increasingly secretive or unwilling to discuss views
- Using derogatory language
- Changing their circle of friends
- Losing interest in activities they once enjoyed
- Becoming socially withdrawn or spending a lot of time online
- Belief in conspiracy theories and distrust of mainstream media
- Justifying the use of violence or expressing a desire for revenge
- Secretive about who they talk to online and which websites they visit

Reporting Terrorism and Suspected Radicalisation

If you suspect someone is involved in terrorism in any way or that someone has been radicalised, you can call the **police** on **101**. You can remain anonymous throughout this process.

If a Prevent concern is identified in relation to an adult, a referral via the All Wales Prevent Referral Form should be submitted into the Welsh Extremism & Counter Terrorism Unit (WECTU).

Please see the below links.

<https://digitalservices.south-wales.police.uk/en/all-wales-prevent-partners-referral-form-english/>

<https://digitalservices.south-wales.police.uk/cy/all-wales-prevent-partners-referral-form-welsh/>

A child referral should be accompanied by a referral into the Cardiff MASH via email to: CSMASH@cardiff.gov.uk or telephone **02920 536400**. If you wish to discuss your concerns with a Club member of staff, please contact the **Head of Safeguarding** on **07872 147351** or email at: safeguarding@cardiffcityfc.co.uk

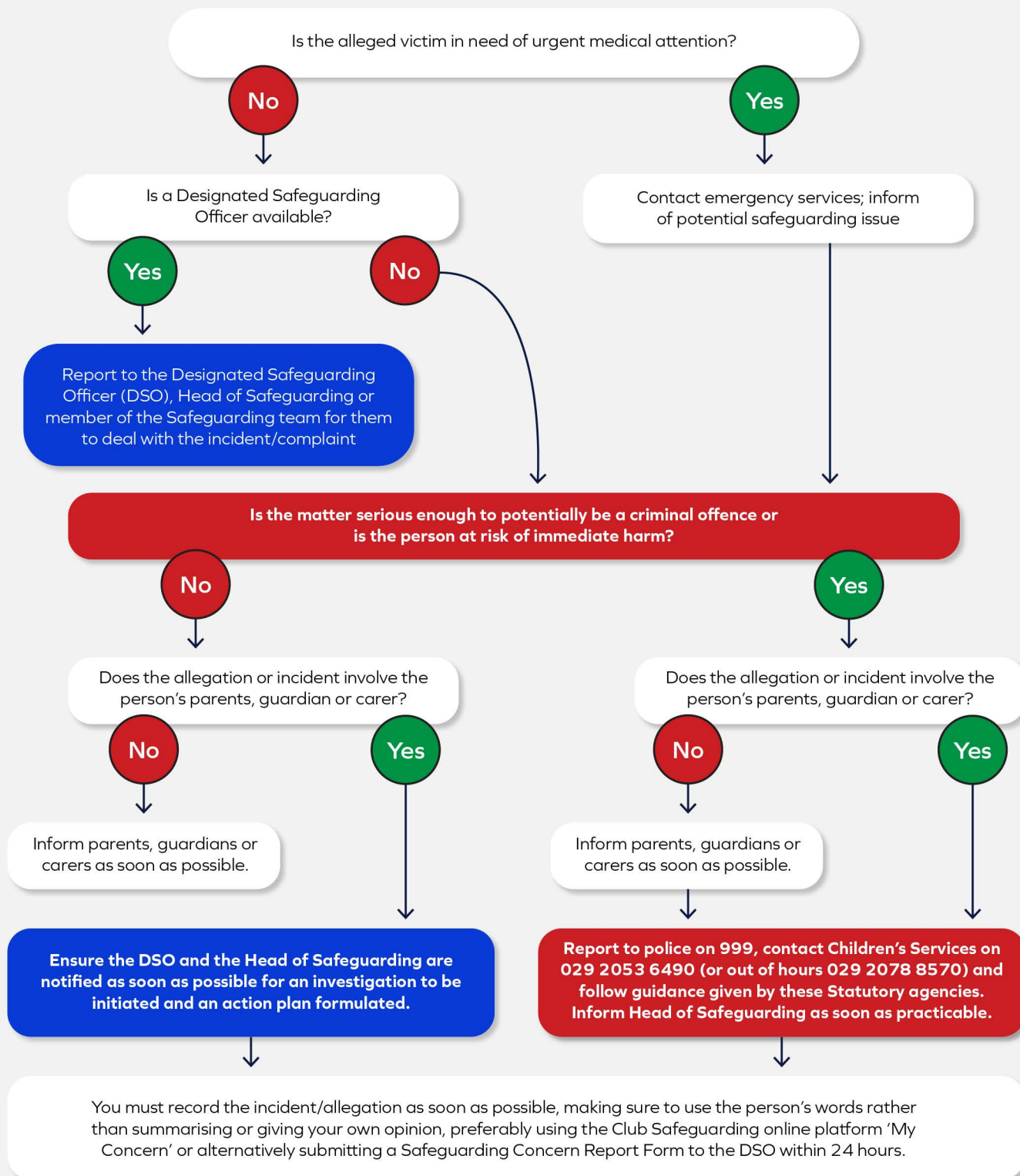
You can report online material that promotes terrorism or extremism on the GOV.UK website <https://www.gov.uk/report-terrorism>

Alternatively, you can call the Anti-Terrorist Hotline anonymously on **0800 789 321**.

E. FLOWCHART FOR RESPONDING TO A CONCERN, INCIDENT OR ALLEGATION

A Child has disclosed concerning information to you OR you have witnessed OR had reported to you a concern or complaint involving a Child, which may be considered abuse or poor practice.

STAY CALM - REASSURE - TAKE SERIOUSLY - NO PROMISES - FEW QUESTIONS - FOLLOW FLOWCHART



IT IS IMPORTANT WHEN CONSIDERING YOUR CONCERN THAT YOU KEEP THE PERSON INFORMED ABOUT ANY DECISIONS AND ACTIONS TAKEN ABOUT THEM AND ALWAYS CONSIDER THEIR NEEDS AND WISHES.

F. CHILD FRIENDLY SAFEGUARDING POLICY



Cardiff City Football Club Child Friendly Safeguarding Policy

Our belief

- All the adults around you think your health, safety and welfare are very important.
- At our Club we respect all children (those Under 18) and adults (those over 18) and help to protect their rights.
- All children have equal rights to protection – regardless of gender, race, age, ethnicity, ability, sexual orientation and religious or political beliefs.

Our aim

- We aim to keep all children safe and provide a safe environment for you and every child on our activities where you will be treated fairly and free from harm, discrimination or bullying.

What is safeguarding?

Safeguarding is about keeping all children, including you, safe.

It is also taking action to protect a child if he/she is being hurt (or may be hurt in the near future) – this is known as ‘child protection’.

We may see and hear things, or you may tell us something and we will need to take action.

You

To keep everyone safe, you are expected to:

- Listen and follow instructions
- Be nice and support others
- Take responsibility for your actions
- Ask for help when you need it
- Respect other children and adults
- Accept difference and value diversity
- Tell us what you like and don't like
- Not bully others, be rude or discriminate



If you need to talk, we will listen

It is important to know where to get help if you are worried or unhappy about something or someone.

- You can talk to any coach or adult looking after you
- You can talk to a member of our Safeguarding Team on **07872 147351**
- You can tell a friend and then go with your friend to tell an adult
- You can contact **CHILDLINE** anytime (24 hours) – calls are free and confidential **0800 11 11**

Don't bottle it up - speak up if someone is:

- Bullying you or saying things to you that you don't like or upsets you
- Sending nasty messages on social media or your phone
- Threatening to send embarrassing photos of you to others or asking for money/ favours*
- Touching you in ways you do not like (know the NSPCC Underwear Rule)*
- Trying to give you tablets, cigarettes, drugs or alcohol*
- Hitting or hurting you OR threatening to harm you, your family or friends*

* We can't keep secrets. If we need to protect you or someone else from harm, then we will need to tell others who can help.

If this stops you speaking up – please call **CHILDLINE** on **0800 11 11**

"SPEAK UP, SPEAK OUT! WE'RE HERE TO LISTEN"

Email: safeguarding@cardiffcityfc.co.uk



G. SAFEGUARDING CONCERN REPORT FORM

Please complete this form within 24 hours of the incident and return to the Designated Safeguarding Officer (DSO) as soon as possible.	
Your name:	Job title:
Your address:	
Phone number(s):	Email address:
Name and contact details of the victim (please complete as much information as is known)	
Name:	
Position in Club: (participant, employee, volunteer etc.)	
Address:	
Date of birth:	Age: (at time of incident)
Gender:	Phone number:
Disability: (if any)	Other useful information:
Name and contact details of alleged perpetrator (if known):	
Name:	Club, role or organisation:
Address:	
If employee, job title:	
How long has this person held this position?	
Age:	Gender:
Email address:	Relationship of accused to the victim:
Do they hold a current CRC DBS check?	
Does this person work in any other role with children (e.g. performance teams, other clubs including grassroots clubs, teacher, scout, care worker etc.)? If yes, please give details:	
Details of the allegation/incident/disclosure:	
Date of incident:	Time of incident:
Where the incident took place:	
Were there any witnesses? If yes, please provide details below:	How would you categorise the incident (e.g. bullying, physical abuse, poor practice, assault etc.)?

What happened? Give as many details as you are able to remember. If a disclosure from a child, please remember to use the child's words rather than summarise it in your own words:

Action taken by you or others so far:

Have you or anyone else from the Club taken any action (e.g. suspended the accused etc.)?

Have you contacted a Safeguarding Officer?

If so, who and when?

Did you need to contact a statutory agency? If yes, give details below:

Signature:

Date:

SHOULD YOU NEED ANY ASSISTANCE COMPLETING THIS FORM, PLEASE CONTACT YOUR DESIGNATED SAFEGUARDING OFFICER OR THE CLUB HEAD OF SAFEGUARDING, ROB CRONICK.

H. CLUB SAFEGUARDING TEAM & CONTACT DETAILS

Cardiff City Safeguarding Team

Head of Safeguarding: **Rob Cronick**

Mobile: **07872 147351**

Email: safeguarding@cardiffcityfc.co.uk

Club/Stadium/Academy

Disability Access Officer: **Ben Jones**

Mobile: **02920 643718**

Email: ben.jones@cardiffcityfc.co.uk

Stewarding and Event Manager: **Tom Nash**

Mobile: **07712 300648**

Email: tomos.nash@cardiffcityfc.co.uk

Academy Player Care Manager: **Sarah Nightingale**

Mobile: **07872 147436**

Email: sarah.nightingale@cardiffcityfc.co.uk

Academy Designated Safeguarding Officer: **Steve Pearce**

Mobile: **07718111630**

Email: steve.pearce@cardiffcityfc.co.uk

Women and Girls Designated Safeguarding Officer: **Iain Darbyshire**

Mobile: **07935 077620**

Email: iain.darbyshire@cardiffcityfc.co.uk

Community Foundation

Senior Safeguarding Manager: **Roxanne Williams**

Mobile: **07487 846778**

Email: roxanne.williams@cardiffcityfc.org.uk

Other Safeguarding Contacts in Football

The English Football League (EFL) Safeguarding Team

Tel: **01772 325940**

Email: safeguarding@efl.com

The FA Safeguarding Team

Tel: **0800 169 1863**

Email: Safeguarding@TheFA.com

If you are worried about your IMMEDIATE safety or the IMMEDIATE safety of another child or adult at risk, please call the Police using '999'

Other External Key Contacts:

NSPCC 24-hour Help Line - **0808 800 5000**

NSPCC Child Line - **0800 1111**

South Wales Police - **101** (Non-Emergency Number)

Cardiff Multi Agency Safeguarding Hub - **02920 536490** (office hours)

Adult Safeguarding - **02922 330888** (office hours)

Emergency Duty Team - **02920 788570** (out of office hours)



CARDIFF C

ROB CRONICK
HEAD OF SAFEGUARDING

safeguarding@cardiffcityfc.co.uk
+44 (0)7872 147351

www.cardiffcityfc.co.uk/club/safeguarding