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Wycombe Wanderers Football Club

Safeguarding Policy

Document Manager	Gordon Reilly
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Prepared by:

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Approved by (WWFC Chairman):

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1. Policy

This policy, which applies to Directors and employees of Wycombe Wanderers Football Club (WWFC), Wycombe Wanderers Ladies Football Club (WWLFC), Wycombe Wanderers Trust (WWT), Franks Adams Legacy Limited (FALL) and Adams Park Security Events (APSE) and all volunteers, agency staff and everyone employed on behalf of the Club, hereafter referred to as “The Club” is designed to ensure the protection of children, young and vulnerable adults, hereafter referred to as “Vulnerable Individuals”. This responsibility applies during the course of matches, events or the day to day running of the Club, whether staged at the Stadium or the Club’s training ground or any other location where the Club is responsible for staging matches or events.

This policy has been drawn up on the basis of law and guidance that seeks to protect such individuals in line with the following:

- [Children Act 1989](#)
- [United Convention of the Rights of the Child 1991](#)
- [General Data Protection Register \(GDPR\)](#)
- [Sexual Offences Act 2003](#)
- [Children Act 2004](#)
- [Protection of Freedoms Act 2012](#)
- [Guidance to help practitioners identify the signs of child abuse and neglect](#)
- [Keeping Children Safe in Education Act 2018](#)

The Club is committed to creating and maintaining a safe, caring and positive environment for vulnerable individuals who attend its’ matches or events and will actively look out for and use its’ best endeavours to prevent and actively manage situations of emotional disturbance, neglect and physical or sexual abuse.

The welfare of such individuals is of paramount importance and the Club is committed to ensuring their right to protection from abuse

In addition, the Club subscribes to [The Football Association’s Safeguarding Children - Policy and Procedures](#) and endorses and adopts the Policy Statement contained in that document.

The key principles of The FA Safeguarding Policy are:

- The vulnerable individual’s welfare is, and must always be, the paramount consideration
- Vulnerable individuals, attending the Club’s matches, events and day today running of the Stadium have a right to be protected from abuse regardless of their age, gender, disability, culture, language, racial origin, religious beliefs or sexual orientation
- In addition, the Club has a role to play in safeguarding the welfare of vulnerable individuals, who attend its’ matches or events, by protecting them from physical, sexual or emotional harm and from neglect or bullying.
- All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately

2. Practice

2.1 Responsibilities

The Club has appointed the Stadium Manager and WWLFC Club Secretary as its Designated Safeguarding Officers (DSO's) who have completed the Safeguarding Children and Welfare Officers Workshop. The DSO is the first point of contact within the Club regarding concerns about the welfare of any vulnerable individual.

The DSO's report to the Club's General Manager who has been appointed as the Senior Safeguarding Manager (SSM) and their responsibilities are listed below:

2.1.1 Senior Safeguarding Manager (SSM) Responsibilities

- Report to the Board on safeguarding and duty of care related issues
- Ensure that the Designated Safeguarding Officer has adequate time and resource to fulfil the requirements of his role
- Ensure that all policies relating to safeguarding are approved
- Play a lead role in developing and establishing the club's approach to safeguarding children, and vulnerable individuals
- Manage cases of poor practice and abuse reported to the Club
- Maintain accurate, confidential and up-to-date documentation on all cases of safeguarding and child protection and report as required.
- Manage referrals to social-care services, LADO, BSCB, TVP, the EFL and FA
- Represent the Club or delegate, if necessary to the DSO, at external meetings
- Coordinate the dissemination of policy, procedures throughout the Club
- Provide advice and support to all staff and volunteers in relation to concerns
- Advise on the Club's training needs and the development of its training strategy
- Play a lead role in maintaining and reviewing the Club's implementation plan
- Ensure safeguarding standards are met and maintained
- Keep own knowledge and skills up-to-date
- Encourage good practice by promoting and championing the safeguarding policy

2.1.2 Designated Safety Officer (DSO) Responsibilities

- Work with all Club staff to implement and promote the Club's safeguarding policies and procedures for vulnerable individuals whilst within the Stadium.
- Develop, review and implement Club Safeguarding Policies
- Ensure Club staff understand their individual responsibilities to safeguard and promote the welfare of all vulnerable groups.
- Act as a source of safeguarding support, advice and expertise to all Club staff.
- Support all Club staff to respond appropriately to concerns about the welfare or safety of all vulnerable groups.
- Give direction and guidance to staff in respect of safeguarding concerns
- Maintain accurate and confidential information by developing and maintaining a secure reporting and recording process to be used by the Club.
- Pro-actively promote and raise safeguarding awareness, including the development and maintenance of a robust training schedule and training package to cover all Club staff and board members.

- Produce regular reports on safeguarding to ensure board members are kept informed of issues and general data associated with safeguarding.
- Represent the Club at relevant safeguarding forums.
- Attend regular safeguarding training and maintain an up to date knowledge base of relevant legislation, regulations and best practice.

2.2 Training

The protection of vulnerable individuals is the responsibility of everyone at the Club. All staff and volunteers of the Club will be made aware of how to recognise abuse and make appropriate referrals to the DSO. Training in these matters will be provided by the Club and records maintained by the DSO.

Key elements of such training will relate to the recognition of abuse and radicalisation & the mechanism for reporting concerns and actions that staff should take in order to avoid any suspicion of improper behaviour.

2.3 Recognition, Radicalisation and Reporting

2.3.1 Recognition of Abuse

The first indication of concern about an individual's welfare is not necessarily the presence of an injury. Club staff and volunteers should consider, in their day to day contact with children and vulnerable adults:

- Observations of a child or vulnerable adult's physical or emotional condition
- Remarks made by a child, a parent or another adult
- Observations of the individual's behaviour or reactions

In particular, some of the following signs might be indicators of abuse or neglect:

- behavioural changes –aggressive, challenging or disruptive
- clothes which are ill-fitting and/or dirty
- consistently poor hygiene
- Individuals who make strong efforts to avoid specific family members or friends
- Children who don't want to change clothes in front of others
- Children who talk about being home alone, with inappropriate carers/strangers;
- Parents who are dismissive and non-responsive to observed concerns
- Children who talk about running away
- Children who shy away from being touched or flinch at sudden movements.

Some of the following signs may be indicators of **physical abuse**:

- frequent injuries
- unexplained or unusual fractures or broken bones
- unexplained bruises, cuts, burns scalds or bite marks.

Some of the following signs may be indicators of **emotional abuse**:

- Children who are excessively withdrawn, fearful, or anxious
- Parents or carers who withdraw their attention from their child
- Parents or carers blaming their problems on their child
- Parents or carers who humiliate their child

Some of the following signs may be indicators of **sexual abuse**:

- knowledge or interest in sexual acts inappropriate to their age
- use of sexual language or sexual knowledge
- asking others to behave sexually or play sexual games
- physical sexual health problems

In addition, the Sexual Offences Act 2003 introduces the following new offences:

- Child sex offences including sexual exploitation of children.
- Abuse of a position of trust.
- Child sex offences within the family.
- Offences against persons with a mental disorder.

2.3.2 Radicalisation

The Club takes due regard of the need to prevent people from being drawn into terrorism. Radicalisation is a process by which susceptible individuals become involved in terrorist-related activities. As such, the Club is committed to providing appropriate training opportunities to staff so that they have an understanding of what radicalisation means, why people may be susceptible to it, how to spot the signs and how to report a concern.

The Club takes particular note of the NSPCC's Guidance on [Spotting signs of Radicalisation](#) in children or vulnerable adults in which the following possible indicators are included and may be identified:

- isolating themselves from family and friends
- talking as if from a scripted speech
- unwillingness or inability to discuss their views
- a sudden disrespectful attitude towards others
- increased levels of anger
- increased secretiveness, especially around internet use
- becoming increasingly argumentative
- refusing to listen to different points of view

- unwilling to engage with children who are different
- becoming abusive to children who are different
- embracing conspiracy theories
- feeling persecuted
- changing friends and appearance
- distancing themselves from old friends
- no longer doing things they used to enjoy
- converting to a new religion
- being secretive and reluctant to discuss their whereabouts
- sympathetic to extremist ideologies and groups

2.3.3 Reporting

Staff should report any such concerns to the DSO at the earliest opportunity, having recorded as much detail as possible of the individual and their specific concerns in order to ensure accuracy in subsequently recalling events. In recognition that the Social Services Department, the NSPCC and Thames Valley Police have a statutory duty to protect vulnerable individuals at risk, the Club, through the DSO, will work in partnership with these agencies, as appropriate. A record of all such issues will be held and maintained by the DSO.

Staff should also be aware they may be required to support other agencies and professionals in an early help assessment following a concern being raised.

Advice from the following bodies may also be sought in the event of issues arising:

- The FA/NSPCC Helpline: Tel: 0808 800 5000
- NSPCC Child Protection in Sport Unit: Tel: 0116 234 7278, www.thecpsu.org.uk
- Thames Valley Police Tel: 101
- Local Authority Designated Officer (LADO) The LADO will provide advice, guidance and help to determine whether a concern or allegation sits within the scope of safeguarding procedures. They have responsibility for ensuring the workforce is safe by managing allegations of abuse or misconduct of professionals working with children, offering advice and making referrals to the relevant bodies as appropriate.
 - Telephone: 01296 382 070
 - Secure email: secure-LADO@buckscc.gcsx.gov.uk
- Buckinghamshire Safeguarding Children Board (BSCB)
 - telephone 01296 383485 or
 - 01296 382537 / jstephenson@buckscc.gov.uk
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2.4 Unattended Children or Vulnerable Adults

Should a member of the Club staff find themselves in a situation where a child or vulnerable individual appears to be lost or unattended they should follow the guidance below:

- Do not move away from the location where the individual has been found.
- Ensure that you are not waiting alone with the individual, and that another member of the Club staff or responsible adult waits with you.
- Should the individual not be reunited with his family or carer within 10 minutes, then arrange for a message to be announced over the Stadium PA system
- If the individual is not reunited, despite the message having been announced, then alert the Club's Designated Safeguarding Officer (the Stadium Manager) to the situation who will issue guidance on the subsequent course of action to taken.

2.5 Staff Actions to Minimise Their Being Compromised

Staff will ensure that, when connecting with children or vulnerable individuals, they behave in a manner that prevents them either being, or being considered to have been, in a compromising position. This may be achieved by ensuring that, when in contact with children or vulnerable individuals, they remain widely visible at all times and that, where confidential discussions are being held, that at least one other adult is present.

2.6 Photography and Video Guidelines

The Club will follow the guidelines below in order to minimise the potential risks of photography and filming at the Stadium, Training Ground or any other location being used:

- The Club will always gain parental permission to take and use photos or videos of a child or vulnerable individual
- The Club will always respect the rights of parents/guardians to withdraw photo or video consent at any time
- The Club will not use children's names in photograph captions (unless parental consent has been gained)
- The Club will only use images of children or vulnerable individuals in suitable clothing to reduce the risk of inappropriate use
- The Club is conscious of how images of children on its' website can be misused and will make appropriate decisions on which photos and videos to publish
- The Club will always convey its' expectations in relation to child protection to professional photographers or the press who are invited to attend. We will never allow professional photographers unsupervised access to children or vulnerable individuals
- The Club explicitly requires any member of staff who has captured images of a child or vulnerable individual, using a personal device in the course of their duties, to safely pass the images to the Club Media Team at the earliest opportunity, and to then immediately and permanently delete those images. Failure to comply with this requirement or to be found in possession of inappropriate photographs or recorded images of any kind, and, in particular, of children or vulnerable individuals in a timescale beyond that which the club deems acceptable, whether or not captured in

the course of their duties, will be subject to disciplinary action, which may result in dismissal.

2.7 Matchday Mascots

As part of the application and acceptance process for children becoming a matchday mascot, the Club issues the following forms to the parent or guardian:

- [Mascot Form 1- Information and Consent](#)
- [Mascot Form 2 - Information for Our Matchday Programme](#)
- [Mascot Form 3 – Kit Order](#)
- [Mascot Form 4 – Matchday Agenda](#)

2.8 Safe Recruitment

In accordance with EFL regulations, the Club will ensure that the Designated Safeguarding Officer will take an active role in the recruitment process, where there is a clear safeguarding requirement. In addition, the Club endorses and adopts [The FA's Responsible Recruitment guidelines](#) for recruiting staff and volunteers and will:

- Develop a role profile.
- Request identification documents.
- Ensure that all catering staff, aged between 16 and 17 have a permit to work and that they do not work with banned objects such as deep fat fryers
- As a minimum meet and chat with the applicant and, where appropriate, conduct interviews before appointing.
- Where appropriate, request and follow up with written references from previous employers and / or character referees before appointing.
- Individuals having responsibility for supervising, training or being in sole charge of vulnerable individuals will be required to complete a Disclosure Barring Service (DBS) assessment via the [FA's Disclosure and Barring Service](#). If there are concerns regarding the appropriateness of an individual already involved or who has approached the Club to become involved, guidance will be sought from the FA
- The Club will not accept DBS checks obtained by an individual whilst in the employ of any other organisation. A job offer will only be made when a satisfactory, current DBS check has been obtained as a result of a request having been made by the Club. The Club reserves the right to request clarification of any element of the DBS check that it feels necessary
- In addition, the Club will follow the [EFL's Safe Recruitment guidelines](#) by ensuring that:
 - clear statements are made in job adverts, in job descriptions and in contracts as to the Club's commitment to safeguarding for those whose role involves work with or on behalf of children or vulnerable individuals
 - questions are asked in job interviews that seek to check an applicant's understanding of safeguarding principles
- Further, the Club will comply with the EFL's Policy Statement on the Recruitment of Ex-Offenders and undertakes to treat all applicants for positions fairly. It undertakes not to discriminate unfairly against any subject of a DBS Check or self-disclosure on the basis of a conviction or other information revealed.

- The Club will ensure that the DSO has received appropriate guidance and training in the Rehabilitation of Offenders Act 1974 relating to the employment of ex-offenders
- The Club will only ask about 'unspent' convictions as defined in the above Act.
- When an enhanced check is sought, The Club will ask about spent and unspent offences but will do so in the spirit of the Act, and in the light of DBS filtering of old and minor offences.
- The Club undertakes to discuss any matter revealed in a DBS check with the person seeking the position before withdrawing a conditional offer of employment.
- Having a criminal record will not necessarily bar an individual from working or volunteering with the Club, any record will be considered as part of a risk assessment that ensures suitability for the post in question.

2.9 Whistleblowing

- **Policy**

The Club will comply with the [Employment Rights Act 1996](#) which provides protection for staff and volunteers who report situations where they reasonably believe that some form of illegality, injustice or breach of health and safety has occurred or is likely to occur.

- **Practice**

In relation to safeguarding issues, where the welfare of a child or vulnerable individual is at risk, all staff and volunteers should acknowledge their individual responsibilities to report as defined below:

- Staff and volunteers must verbally report matters of concern to their immediate supervisor, followed up immediately in writing. Such reporting will remain confidential
- The supervisor must immediately forward the report to the DSO
- The DSO will institute a thorough investigation, involving all relevant parties and will report the outcome of the investigation to the SSO

It is essential that any allegation of abuse made against a member of the Club's staff is dealt with fairly, quickly and consistently, in a way which provides effective protection for the person concerned, and at the same time supports the person who is the subject of the allegation.

2.10 Anti-Bullying

- **Policy**

Bullying is an act of aggression, causing embarrassment, pain or discomfort and can take a number of forms, including, but not limited to, physical, verbal, gesturing, extortion, exclusion, sexual and online social media behaviour.

The Club will not tolerate bullying in any form or setting and all staff and volunteers have a responsibility to identify, report and prevent instances of bullying.

- **Practice**

Instances of bullying must be reported to the DSO, will be taken seriously and will be thoroughly investigated by the Club and a report generated following the investigation, in accordance with the following:

- It will take seriously all discoveries or accusations of bullying and will fully investigate the nature of said discoveries or accusations
- It will support and respond to the needs of all parties involved
- It will keep accurate records regarding instances of bullying
- It will keep informed all those concerned in the bullying incident
- It will apply necessary sanctions following the investigation
- It will contact relevant professionals and/or statutory organisations, if appropriate

2.11 Allegations of Misconduct

It is important that any allegations of abuse or misconduct against a member of staff or volunteer is reported immediately to the DSO and is dealt with thoroughly, efficiently and in confidence, in the best interests of all parties involved. A breach of confidentiality will be taken seriously and may warrant its own investigation.

An investigation into the allegations will normally be carried out either by the DSO or by other statutory services depending on the nature of the allegation. This will be agreed at the initial evaluation stage. Internal investigations will be second to any safeguarding investigation and may need to be delayed until the external investigation is complete.

The Club will provide every consideration and support to all parties involved, in order to minimise the stress resulting from the allegation and the disciplinary process.

All parties involved in the allegation will be notified of the detail of the allegation. However, if Thames Valley Police or social services are involved, they will be contacted initially and will advise on the information that may be disclosed.

Where there is a chance of suspension, the employee will receive confirmation within one working day and will be informed of the reason for the suspension.

If an employee hands in their resignation when the allegation is made against them or during an investigation, the investigation will still continue until an outcome has been reached.

Detailed records of all allegations made, investigations and outcomes should be kept in the personal file of the Club's staff member who has been under investigation, and a copy of the information will be provided to the member in question.

Allegations that are proven to be unfounded will not be kept on employment records or used in employee references. The records will be kept by the DSO.

If the investigation results in the dismissal or resignation of a person, and that person has been charged with a criminal offence, a referral must be made immediately by the Club to the FA Safeguarding Department.

If it is decided that the employee may return to normal duties, after a suspension, then provisions will be put in place to ensure that the transition is as smooth as possible. This may involve a phased return for a trial period or the use of another member of staff as support in the short term.

2.12 Wycombe Wanderers Ladies Football Club

In addition to the above conditions, the following specific arrangements exist for the U18's Ladies team and in the event that the senior Ladies team were to include U-18's in their matchday squad or training sessions. These arrangements therefore apply to both the Senior and Under 18 age groups at the time of a match or training session:

- **General**

- Children and young people are entitled to respect and privacy
- Staff must be vigilant about their own behaviour, follow these arrangements and be mindful of the needs of participants. Any concerns about adult behaviour or about the behaviour of young people should be reported to the DSO
- Changing Room arrangements at both home and away grounds will be considered and appropriate actions taken whenever possible to reduce risks or concerns.
- The Club will ensure that children and parents are aware that they can choose the option of changing at home before and after activities if they have difficulties in relation to changing in front of others.
- Staff should not take responsibility for changing or performing any personal care unless in an emergency which should be recorded and reported to the DSO.
- Where changing areas are unsupervised, and the Club has made parents aware of this, it is the responsibility of parents or carers to judge whether they are prepared to consent for their child to participate.
- Parents are responsible for the supervision of their child up to the point that Club staff assume control and from the time that Club staff relinquish such control following the end of the match or training session.
- If parents or carers undertake any supervisory role at the request of Club staff, safe deployment steps will be taken to ensure their suitability for the role.
- Prior to entering changing areas, Club staff will announce their intention of entering by knocking on the door and asking permission to enter.
- Staff and supervising adults will not change in the same place as children, shower with children nor assist with any personal task which a child can undertake themselves
- The Club will treat any concerns which relate to photography in changing areas as a serious breach of this Safeguarding Policy and should be immediately reported to the DSO.

- **Late Collection**

- This policy is for the protection of members of WWLFC who have been left uncollected past the agreed finish/collection time following WWLFC matches or training sessions.
- In order to minimise the occurrence of these situations the following guidance should be followed:
- WWLFC staff should have immediate access to all participants' emergency contact details (ideally a primary AND secondary contact);
- All timings for WWLFC sessions should be clearly communicated to parents/guardians.
- Parents and guardians should be made aware of the ways in which they can contact WWLFC in the event that they are unable to collect their child at the planned time
- WWLFC staff will do their utmost to reassure all children who are late being collected so as to avoid contributing to their upset or worry.

- Should a member of WWLFC find themselves in a situation where they are responsible for a child who has not been collected they should follow the guidance below:
- Waiting 10 minutes or more:
 - Attempt to contact the primary emergency contact initially, and the secondary contact if the primary contact can't be reached;
 - Do not move away from the designated pick-up point;
 - Where possible ensure that you are not waiting alone with the child, and that another member of WWLFC or responsible adult waits with you.
 - Depending on the setting consider if other relevant individuals or organisations (such as schools) should be made aware of the situation retrospectively in order to safeguard against a similar situation arising in the future. This should be at the WWLFC staff's discretion but if in any doubt please seek advice from the WWLFC Designated Safeguarding Officer.
- Waiting 45 minutes or more:
 - If not already done, alert the WWLFC Designated Safeguarding Officer to the situation and follow guidance on the subsequent course of action to be taken.
- **Trips and Tours**
- It is important that going to away matches and tours should be safe, allowing WWLFC members to grow in confidence, self-esteem and skills.
- WWLFC recognise that parents and guardians may worry when their children are away so this policy aims to minimise these concerns and demonstrate that WWLFC will take into account the various needs of their children and the potential dangers of a trip away.
- WWLFC commits to the following whenever away matches or tours are arranged:
 - No child will be permitted to travel to an away match or on tour without WWLFC obtaining relevant permission from a parent/guardian;
 - It will always identify the lead member traveling with the group;
 - It will ensure that any WWLFC member travelling to an away match or on tour is fully qualified to undertake relevant duties;
 - It will do everything reasonably possible to ensure they are fully informed regarding individual participants' medical conditions and related needs;
 - All WWLFC trips and tours will be staffed by a member who is first aid trained, and who carries with them a fully stocked first aid kit;
 - It will ensure all relevant insurances are in place, including but not limited to public liability and personal accident
 - It will ensure that all parents/guardians are fully informed regarding the trip or tour and will provide ample means and opportunities to ask any questions
 - It will always ensure that parents/guardians have a WWLFC point of contact that is travelling with the group.

2.13 Information Sharing

The Club will follow [HM Government's 7 Golden Rules for information sharing](#), as defined below:

1. The General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from the SSO or DSO, if there is any doubt about sharing the information concerned, without disclosing the identity of the individual, where possible.
4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 information may be shared without consent if there is a lawful basis to do so, such as where safety may be at risk. Judgement will need to be based on the facts of the case. When sharing or requesting personal information from someone, be clear of the basis of doing so. Where consent is not obtained, be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being: base information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information shared is necessary for the purpose for which it is being shared, is shared only with those individuals who need to have it, is accurate and up to-date, is shared in a timely fashion, and is shared securely.
7. Keep a record of the decision to share and the reasons for it, whether it is to share information or not, what you have shared, with whom and for what purpose.

2.14 Wycombe Wanderers Sports and Education Trust

Wycombe Wanderers Sports and Education Trust (WWSET), the charitable arm of Wycombe Wanderers Football Club, operating at the Stadium, has produced its' own [Child Protection and Vulnerable Adults Policy](#) which is consistent with that of the Club. The Head of the Sports and Education Trust is also qualified as a DSO.