

SAFEGUARDING MATTERS CHILDREN AND YOUNG PEOPLE POLICY

1. POLICY PURPOSE

The Liverpool Football Club Foundation (“Foundation”) is committed to safeguarding and protecting children and young people and accepts its responsibility for the safety and welfare of all children and young people who engage with the Foundation.

This policy is to be read in conjunction with the Foundation’s Children and Young People Safeguarding Toolkit, which provides further information and guidance on how to deal with a safeguarding incident/ concern.

This policy sets out the Foundation’s approach to safeguarding children and young people along with summary guidelines and standards of conduct for Foundation employees and workers who work with children and young people, either directly or indirectly.

In addition, the policy aims to promote the safety and wellbeing of children and to provide assurance to parents, carers and other parties that we take reasonable steps to manage risks, based on overarching principles, with the aim of keeping children and young people safe.

2. WHO THIS POLICY APPLIES TO

This policy and its operating principles, apply to all the Foundation irrespective of the type of contract on which they are employed or the hours and days that they work, or the nominated location at which they work (including any overseas locations). The policy also applies to any

other individual, worker or consultant who is engaged by, or does work on behalf of, or for, the Foundation. This policy does not form part of any employee’s contract of employment.

This policy may be amended at any time by the Foundation (at its own discretion) including being reviewed annually, in line with the annual review of the Premier League Rules and Regulations.

3. DEFINITIONS

Child and Young People

For the purposes of this policy, the following definitions are used:

- “Child or Children” - refers to anyone less than 18 years of age and anyone under school leaver age;
- “Young Person” – refers to anyone after school leaving age and less than 18 years of age;
- “Child at Risk” – is defined under the Children Act 1989 as a child who is unlikely to reach or maintain a satisfactory level of health or development, or their health or development will be significantly impaired, without the provision of services, or the child is disabled.

Safeguarding Children and Child Protection

‘Working Together to Safeguard Children’ (2015) states that ‘Safeguarding and promoting the welfare of children’ means the process of;

- Protecting children from maltreatment (i.e. abuse or neglect);
- Preventing impairment of children's health and development;
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- Acting to enable all children to have the best outcomes, so that they have optimum life chances and enter adulthood successfully.

'Child Protection' is part of safeguarding and promoting welfare. The term 'child protection' refers to the activity which is undertaken to protect specific children who are suffering, or at risk of suffering, significant harm.

Alerter Role

Foundation employees and workers have responsibilities within the legislation, particular regulations, and morally to report any concerns of abuse, neglect or any other mistreatment, to the relevant local authorities.

4. OUR AIMS - POLICY STATEMENT

The Foundation recognise the importance of safeguarding children and young people, and that children and young people have the right to access Foundation services enabling them to participate in any Foundation activity in an enjoyable, safe, inclusive and child-centred environment without risk of abuse, neglect or mistreatment. Their welfare is paramount and the Foundation is committed to safeguarding and protecting them.

Effective safeguarding can help to establish a safe environment which protects children and young people, whilst also ensuring that our employees and workers understand their duty of care to

keep children and young people safe and secure. Within the provision of all our services, safeguarding matters and the principles of safeguarding will be given appropriate and due consideration. The Foundation must ensure that the safeguarding policy and procedure deals effectively with any safeguarding incident that does arise, and the Foundation also has an effective complaints and whistle-blowing policy and process.

Through our planning, preparation and engagement with vulnerable groups we will align our practices and consider the FA, Premier League affiliated football Safeguarding Vulnerable Groups and Safer Recruitment requirements and any other appropriate rules, as reasonably practicable. These will be reviewed annually or following release of updated information and/ or legislation from the appropriate governing body or at any other appropriate time during the season, at the Foundation's discretion.

All children and young people have the same protection regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity and have a right to equal protection from all types of harm or abuse.

The Foundation expect all employees and workers to behave in a way that demonstrates integrity, maturity and good judgement, and in line with the Club values of Ambition, Commitment, Dignity and Unity. Any person responsible for a child or young person whether solely or jointly is in a position of trust and may be considered as a role model and as such, their behaviour should be in accordance with the guidelines contained within this policy. This means that they must;

- Perform their duties in accordance with the principles in this policy relating to safeguarding children and young people; and as laid out in

relevant football rules including the Premier League guidelines for Safeguarding of Vulnerable Groups and Safer Recruitment; and NSPCC guidelines; and

- Work in partnership with the children and young people and any relevant agencies or other nominated organisations; and
- Be responsible for their own conduct; and
- Comply with all safeguarding rules and regulations as stipulated by the FA Premier League rules and guidelines, and adhere to NSPCC guidelines and principles; and
- Raise any genuine safeguarding concerns they have in line with the Foundation's agreed processes and procedures.

5. PRINCIPLES OF SAFEGUARDING CHILDREN AND YOUNG PEOPLE

The Foundation seeks to keep children and young people safe and we expect all those working for and on behalf of the Foundation both directly and indirectly with children and young people to adhere to the following principles;

- To safeguard all children and young people who interact with the Foundation;
- To ensure that the child or young person's safety and welfare is a key consideration in all that we do;
- To take all safeguarding concerns of abuse seriously and to respond efficiently and appropriately;
- Value all children and young people, listen to them and respect them;

- Listen to children and adults at risk and take account of their feelings and wishes both in individual decisions and in the development of services
- To promote best practise, and demonstrate the right standards of behaviour and display high moral and ethical standards in relation to all interactions with children and young people;
- To avoid any conduct which might lead a 'reasonable person' to question any one's behaviour, motivation or intentions;
- To report any concerns about the safety, protection and welfare of a child, children and/or young person/s;
- To keep appropriate and timely records on matters related to safeguarding and/or safeguarding or welfare concerns, recording and storing information professionally and securely; and sharing information about safeguarding and good practise with children, their families, our employees and workers through a variety of media;
- To treat all people equitably and fairly in line with our Equality and Diversity Policy;
- Using our procedures to manage any allegations against our employees of workers appropriately;
- Provide a safe physical environment for our children and young people by applying appropriate health and safety measures in accordance with the law and/ or other regulatory guidance.

Historical Allegations

The Foundation will manage any/ all allegations of a historical nature in accordance with the relevant guidance from football governing bodies and/ or external agencies, including guidance from the police. In all cases, internal stakeholders will be identified and engaged to ensure an open and transparent process is undertaken, including how to gather relevant information and sharing this as required/ appropriately.

6. RISK MANAGEMENT

The Foundation has, and will, establish processes to ensure that any safeguarding incidents are captured, monitored and reviewed, and managed (and reported) accordingly. Any potential safeguarding risks will be identified and recorded in the Foundation's Safeguarding Incident Log and managed appropriately. The contents of the Safeguarding Incident Log shall be added to, reviewed and/or updated following any safeguarding incident or concern being raised and/ or concluded, and as part of the Foundation' overall management of its Safeguarding incident log.

7. RECRUITMENT AND APPOINTMENT

The Foundation operates a Safer Recruitment Policy (which should be read in conjunction with this policy) in line with Premier League (and other external bodies) requirements. Where/when a role involves working with children or young people the Foundation will adopt Liverpool Football Club (the "Club") and Athletics Ground Ltd process and will be subject to appropriate checks, including a Disclosure and Barring Service (DBS) check at the appropriate level. At least two separate references acceptable to the Foundation will be required for a position to be offered and prior to its acceptance. Any role subject to a DBS check will be identified

by the Club's Safeguarding Assurance Manager (in collaboration with the HR Team) and a DBS application link will be issued by a nominated verifier. Individuals will not be permitted to assume their role and/ or duties until such satisfactory checks are completed and approved. All DBS applications are electronic and processed by an independent third party. DBS checks can take time to process due to various factors, ranging from days to months. Applicants should therefore be mindful of this when submitting any notice to join the Foundation, as the Foundation is unable to determine the timeframe and therefore any unexpected loss which may arise from a delay.

For regulated activity, a DBS check is required due to the nature of the role applied for, and spent convictions are to be disclosed by virtue of the Rehabilitation of Offenders Act Exception Order. The amendments to the Exceptions Order 1975 (2013) provide that certain spent convictions and cautions are "protected" and are not subject to disclosure to employers, and cannot be taken into account. Guidance and criteria on the filtering of these cautions and convictions can be found on the Disclosure & Barring Service website

(<https://www.gov.uk/government/news/disclosure-and-barring-service-filtering>).

For non-regulated activity, the DBS check will exclude the request in relation to around "spent" convictions.

Self-Declaration

To compliment the Foundations' safer recruitment process, where appropriate, a request to complete a self-declaration may be made. This will be used in conjunction with the outcome of the DBS check and for an initial assessment of suitability.

Overseas residency, criminal record checks.

Where an individual has resided overseas, and where applicable, that the equivalent background check (to a DBS check) will be completed before an individual can assume their duties. In all instances, it will be responsibility of the individual to obtain and present their documentation for clearance purposes.

The Club's Safeguarding Assurance Manager will coordinate any such checks required for overseas residents.

Frequency of Checks

All employees and workers in a position of trust are required to undergo regular DBS checks/ clearances, normally every three years or earlier if required.

Disclosed DBS content

Where content is disclosed we will undertake a risk assessment and consider/ evaluate the content against the responsibilities of the role being offered and the detail of the content, length of time from last offence, history of offending and patterns of offending. Each case is treated individually and applicants may be offered the opportunity to discuss the content of their criminal history where appropriate to do so. There are certain entries or convictions that the Club cannot consider due to their nature.

Our process ensures we work in a fair and balanced manner and we are working in accordance with relevant legislation such as the Protection of Freedom Act 2012 and Rehabilitation of Offenders Act 1974 / 2014 and in line with the Disclosure and Barring Service requirements.

8. Third Parties

External Agencies (Safeguarding Boards)

The Club works in partnership with Liverpool Children Safeguarding Board (LCSB) and other relevant local multi agency authorities within Liverpool and the surrounding areas within which we operate.

In the event of a serious safeguarding incident occurring, the Foundation will require the Club's Safeguarding Assurance Manager to take the lead in reporting and working with the relevant Local Authority and/or Safeguarding Children Board and/ or multi-agency authorities.

The Club will continue to develop and support relationships with Local Authority Designated Officers (LADO's) and will refer all relevant information to them within an appropriate period of time.

Where safeguarding information is referred in to the Foundation from an external agency, the Foundation will review it and engage appropriate internal stakeholders including the Club's Safeguarding Assurance Manager (on a confidential, need to know basis) to manage accordingly - dependent upon the nature of the referral. At times, independent external advice and guidance will be sought from the most appropriate stakeholder.

Liverpool Football Club

The Foundation will follow its own Safeguarding policy and procedures when delivering sport sessions for/ on behalf of the Club.

Schools

When delivering on school premise, the Foundation will follow the school's safeguarding policy in the first instance and then inform the Foundation's safeguarding team. It is the school's responsibility to ensure the Foundation is aware of their policy and procedures. This

is detailed in an SLA provided by the Foundation to schools.

Other delivery sites (not schools)

The Foundation will follow its own Safeguarding policy and procedures which includes having a Venue File at every site. The Venue file contains key documents including the safeguarding incident reporting process.

The Club's Business/ Commercial Partnerships

The Foundation will follow its own Safeguarding policy and procedures when delivering sport sessions for/ on behalf of Club's Business/Commercial Partners.

Public Relations (PR) and Communication

The Foundation will ensure appropriate engagement with the PR & Communications team, during any safeguarding incident, investigation or external process. It is critical that a clear picture as possible is provided to ensure the Foundations' and Clubs' brand and reputation are upheld, as well as ensuring sensitivity to any internal or external process being undertaken. Furthermore, the PR & Communications team must be made aware of any media coverage that arises as part of any process, to enable appropriate management of coverage, and to ensure a fair and balanced process is undertaken.

9. RADICALISM AND EXTREMISM

Radicalisation and exposing children and young people to extreme behaviours is a form of emotional abuse and is a safeguarding risk that the Foundation will monitor and manage in accordance with its established processes in the event a concern is raised.

HM Government states that the aim of radicalism is to attract children and young people to an extremist ideology. In many cases it is with a view to inspiring children and young people to take up these views and eventually these extreme behaviours. Radicalisation can take place through direct personal contact, or indirectly through social media. Extremism is defined as 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.

10. CLUB ACTIVITIES

Ratios

Ratios should be defined at the planning stage of any project or session, to ensure that the needs of the group are planned for and appropriately delivered. The Foundation's Children and Young People Safeguarding Toolkit provides further information and guidance.

Match days

The Foundation will take instruction from the Club on match days and follow Club advice on safeguarding at and around the stadium.

Capturing and Using Images of Vulnerable Groups

On occasions, the Foundation may wish to take and use images of children participating within events and activities arranged by the Club. The Club adheres to the Premier League Code of Practice for Images and Footage of Children's Football Participation. 'Images' refers to all photographs taken via a film, digital camera (including mobile phone) and all types of moving pictures. All LFC nominated Children's photographers undergo DBS checks and complete safeguarding training. Images of children

may only be taken on a device that belongs to the LFC Foundation or Liverpool Football Club. Staff must, under no circumstances, use a personal devices to take images of children. Wherever possible, consent in relation to the use of images will be sought in writing at the start of each season or prior to an event.

The Children and Young People Safeguarding Toolkit contains further information and guidance.

11. TRAVEL, TRIPS AND TOURNAMENTS

The Foundation will implement the Club's policy and comply with any specific guidelines issued by the Premier League (in force from time to time) in relation to Travel, Trips and Tournaments (and events etc).

Thorough risk assessments will be completed prior to this type of activity taking place, taking account of any relevant health and safety requirements.

Where a child or young person is involved in a trip, activity or event etc, a risk assessment must take account of his/ her particular vulnerabilities whilst in the Foundation's care. The risk assessment will set out the arrangements in place for his/ her care and supervision and how risks will be minimised.

Activity leaders will be required to continually monitor and amend the controls within the risk assessments whilst leading such activities.

Appropriate records will be required to be kept and retained for a reasonable period.

The Foundation and Club's Travel, Trips and Tours Policy and Children and Young People Safeguarding Toolkit should also be referenced.

12. TRAINING

Safeguarding Awareness training forms part of the Club's Corporate Induction process which Foundation staff attend. All employees are expected to attend shortly after commencing their employment with the Foundation. The content is reviewed annually.

Each season the Club's Safeguarding Assurance Manager together with the Foundation safeguarding team will conduct a training needs analysis, from which a training plan is developed. Where a safeguarding training need is identified, employees and workers are obliged to attend such training events and are expected to participate fully in any such training programme, with the aim of incorporating learnings into their working practices.

For specific nominated roles, refresher training is provided every three years or earlier as required.

Where appropriate, staff and players will also be educated in relevant safeguarding topics on a seasonal basis, considering any prevailing legislation, Premier League Rules or guidance, current 'topical' subjects and any identified risk areas. This may include the following;

- FA safeguarding training
- Prevent and online extremism
- Social Media and electronic communication
- Consents and appropriate behaviour
- Gambling and addiction
- Mental Health
- Driver safety
- Emotional wellbeing

13. CONFIDENTIALITY

Every effort should be made to ensure that confidentiality of safeguarding cases is maintained for all concerned. Information should be handled and disseminated on a need to know basis only, which would not normally include anyone other than the following;

- The Foundation safeguarding team, Head of Foundation and Chair of Trustees
- The Club's Safeguarding Assurance Manager and HR Director;
- The child or young person or the person raising the concern;
- The employee, worker or other individual engaged by the Club who has received the concern or disclosure;
- The parents/ carers of the child or young person who is alleged to have been abused, where appropriate;
- Local Authority and Police;
- Dependent on role the National Governing Body

Some employees or workers may have access to confidential information about a child, children or young people as part of their responsibilities. This could be highly sensitive or personal information. Confidential or personal information about a child, children or young person or his/her family should not be used for their own or others advantage.

Confidential information about a child or young person should never be used casually in conversation, or shared with any other person other than on a need to know basis and must be handled discreetly. In circumstances where the child or young person's identity does not

need to be disclosed, the information should be handled anonymously.

There may be times, e.g., for the protection of vulnerable groups, when it is necessary to share information with parent, carers, football and statutory bodies. This is known as a 'referral'. Where possible, referrals will only be made with consent and a record of this along with the justification for the referral must be recorded and kept on file. Any information stored, will be stored in line with the Club's Data Protection Policy.

14. MANAGING A CONCERN

If an employee or worker has concerns that a child or young person is at risk of harm or abuse, they should raise their concerns with the Foundation's safeguarding team in the first instance. Where this is not possible then they should ensure the safety of the child or young person, fully documenting everything that is said and the reasons for their actions. Where the concern involves a potential crime being committed then the Police should be contacted dialling 999.

All employees and workers reporting a genuine concern for the immediate welfare, safety or protection of a child, children or young person/s must advise the Foundation's safeguarding team as soon as possible after it has been reported and appropriate support will be given by the Foundation.

15. ALLEGATIONS MADE AGAINST AN EMPLOYEE, WORKER OR OTHER INDIVIDUAL EMPLOYED OR ENGAGED BY THE CLUB

The Foundation operates in an open and transparent manner. Any concerns relating to an employee, worker, or other individual employed or engaged by the Foundation, should be recorded and forwarded to the Foundation safeguarding team at the first available opportunity.

16. ROLES AND RESPONSIBILITIES

The nominated trustee safeguarding lead is responsible for ensuring that those benefiting from or working with the Foundation are not harmed in any way through their engagements. They have a legal duty to act prudently and this means that they must take all reasonable steps within their power to ensure that this does not happen.

The Head of LFC Foundation has strategic responsibility for safeguarding, supported by the Head of the Community Delivery Unit, Club HR Director and Club Safeguarding Assurance Manager, and will ensure that safeguarding is a key priority with Foundation trustees.

The Head of the Community Delivery Unit will hold the safeguarding Champions remit and form part of the safeguarding structure within the Foundation, with support from Club Safeguarding Assurance Manager. They will hold delegated responsibility for day to day safeguarding procedures and practice whilst forming part of the panel for recruitment and incident management.

The Foundation safeguarding team will be the lead point of contact should any safeguarding concerns arise. This may include investigation, procedure development, communication and training provisions. They are responsible for ensuring that they communicate and implement the Foundation's safeguarding policy and associated procedures within their area of work.

Foundation employees, workers and volunteers are expected to adopt the principles of safeguarding within their day-to-day work for the Foundation in all interactions with children and young people on behalf of, or as associated with the Club.

17. HOW PARTICIPANTS AND BENEFICIARIES ARE INFORMED ABOUT OUR SAFEGUARDING POLICY AND PROCEDURES

Our policy and procedures are available on the LFC Foundation website <https://foundation.liverpoolfc.com/about-us/safeguarding> and all participants are signposted to this. From September 2019 all participants will book their place on foundation activities through the Open Play system. The booking confirmation highlights that if anyone has any safeguarding concerns they can access contact details via the policy and the hyperlink is provided. Additionally all participants on foundation activities receive a Safeguarding Card which includes the contact details for the Foundation Safeguarding Team and other agencies.

Useful Contacts

LFC Foundation Safeguarding Team

Name: Martin Talbot
Designation: Head of Community Delivery
Telephone: 07740 782 680
Email: martin.talbot@liverpoolfc.com

Name: Karl Carney
Designation: Coach Engagement
Manager
Contact Number: 07874 777 995
Email: karl.carney@liverpoolfc.com

Name: Dawn Georgeson
Designation: Volunteer Lead
Contact Number: 07566 292 969
Email: dawn.georgeson@liverpoolfc.com

Name: Andrew Hanlon
Designation: Onside Project Lead
Contact Number: 07724 700 454
Email: andrew.hanlon@liverpoolfc.com

NSPCC Child Protection in Sport Unit:
0116 234 7278

Useful Links

<https://www.ceop.police.uk/safety-centre/>

<https://www.childrenengland.org.uk/>

<http://www.bullying.co.uk/cyberbullying/>

<https://www.saferinternet.org.uk>

<https://www.getsafeonline.org/safeguarding-children/>

<https://thecpsu.org.uk/>

Police: 999 (emergencies)

NSPCC: 0800 800 5000

Family Lives: 0808 800 2222

Children England: 0207 833 3319

*We are committed to reviewing our policy
and good practice **annually**.*

This policy was last reviewed on:

14th August 2019

Signed:



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Matt Parish, Foundation Director

Signed:

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*Safeguarding Lead on Board of Trustees,
Gavin Laws*