



Group Safeguarding Policy and Mandatory Guidance



**CREATING & MAINTAINING SAFE ENVIRONMENTS
FOR CHILDREN AND OTHER VULNERABLE PEOPLE**



Foreword & Introduction

City Football Group is firmly committed to ensuring the safety and wellbeing of the many individuals and communities we come in to contact with; it is fundamental to our operation that we provide a positive experience, particularly for children, young people and other vulnerable people. In order to maintain a consistent approach we have created SafeAtCity, a global safeguarding programme designed to help protect them from abuse, bullying and neglect, and to ensure appropriate development and access to opportunities.

The onus is on everyone who has contact with children and other vulnerable people to create a positive environment in which they can participate, and to protect them from harm. Based on best practice from across sport and social care, SafeAtCity provides information about different types of abuse, advice on identifying problems, and guidance and procedures for use by those involved in delivering City Football Group activities.

The policy document contains a series of both mandatory and recommended principles that must be implemented across all City Football Group activities. This will help ensure consistency across these activities whilst taking into account local laws, regulations and culture, as well as the individual needs of the business. In doing so, our SafeAtCity programme will clearly demonstrate our commitment to risk management in sport.

Ferran Soriano
Chief Executive Officer
City Football Group

Approved by City Football Group Board April 2015

Support for this policy

UNICEF (UK)

(International Safeguarding Children in Sport working group coordinator)

All children have the right to participate in sport in a safe and enjoyable environment; it is a crucial part of a happy, healthy childhood. The City Football Group is a pioneer of the International Safeguarding Children in Sport initiative, which Unicef UK coordinates. The Safeguards developed through this initiative, and reflected in this policy, have been designed to support sporting organisations to deliver safer and more enjoyable activities for the children taking part. This policy reflects good practice and will support members of the City Football Group to better safeguard the children and vulnerable adults that participate in their activities around the world.

NSPCC Child Protection in Sport Unit (CPSU)

The City Football Group is a member of the International Safeguards For Children in Sport Project and a member of the International Learning Set co-ordinated by the NSPCC's Child Protection In Sport Unit (CPSU). The CPSU has reviewed this policy and are happy to acknowledge that it reflects good practice as outlined in the International Safeguards For Children In Sport. This is an essential step towards the creation of a safe and enjoyable environments for children and young people in all of the contexts in which the CFG works.

Premier League

The Premier League places great importance on safeguarding children and other vulnerable people. We work closely with our clubs, including Manchester City FC to ensure that these participants enjoy a safe and positive experience in an environment where individuals feel able to raise concerns and where poor practice and inappropriate behaviour can be openly challenged. This policy sets a positive example and demonstrates Manchester City FC's commitment to safeguarding.

Major League Soccer

Keeping children safe from abuse and neglect is of paramount importance to Major League Soccer and its clubs. This policy presents a firm commitment and clear approach to protecting vulnerable participants who come into contact with the City Football Group, its associated companies, and employees.

Manchester Safeguarding Children Board

The Manchester Safeguarding Children Board welcomes the approach taken by the City Football Group to provide policy and guidance to help ensure the safety and well-being of those with whom they come into contact, "SafeAtCity". It reflects the commitment the organisation has shown and takes account of current legal requirements regulations and culture and reflects the most up-to-date guidance.

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Prepared by: Nic Scott, Head of Safeguarding
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Terminology & Definitions

Abuse – harm will often be related to abuse of which there are several recognised forms many relating to both children and other vulnerable people emotional (including bullying, hazing,), discriminatory, financial, physical, neglect and sexual. Financial abuse is something more usually related to adults but where professional (and future professional) footballers are concerned this is a significant area of risk. The types of abuse recognised by the Group are detailed in Appendix 2.

Activity – (or activities) refers to any matches, events, coaching or education programmes, tours or other related activities where the Group has a responsibility (both direct or indirect) for the welfare of individuals taking part.

Child / Children – the United Nation's Convention on the Rights of the Child defines a child as an individual below the age of 18 (for disabled individuals this is 21). In some territories the legal age of adulthood is set lower. For the purposes of Group activity and this Policy a child shall be an individual who has not yet reached their 18th birthday though again in countries even this definition may present some difficulties. In all instances the Group will recognise local legislation but will apply good practice principles and mandatory workforce conduct in respect of working with children as detailed in this document. It will also seek to apply the International Safeguards for Children in Sport to its working practices.

Child Protection - is the process of protecting individual children identified as either suffering, or likely to suffer, significant harm as a result of abuse or neglect. It involves measures and structures designed to prevent and respond to abuse and neglect. Child protection is part of an effective Safeguarding framework.

Consent - is the agreement or permission to do or allow something. Most activities involving children require the consent or approval of the child's parent. Further explanation and context is presented on page 18.

Duty of Care – Organisations in most countries have both a legal and moral duty of care to those who consume its goods or services. At the City Football Group this means our goods and services are governed by laws designed to protect consumers – such as Health and Safety and statute related to the protection of children. The moral duty in respect of children and other vulnerable people more about the need to act as a reasonable parent would act when taking responsibility for a child. It is also about all people being vigilant and reporting any concerns that they have about someone else and those in positions of responsibility taking action to help.

(The) Group – refers to City Football Group Ltd (or CFG), its associated companies (including football clubs), their related workforce and all relevant activities. An activity is Group-led when a member of the Group's staff is responsible for the planning, organisation and/or delivery of the activity. In certain circumstances it may also refer to third parties with a devolved responsibility for delivering Group-supported activity such as contractors or charitable organisations.

Grantees – this refers to other organisations who are funded/grant-aided through the charitable elements of the Group. In most circumstances Grantees are entirely responsible for delivering activities that are not the responsibility of the Group.

Harm – means injury, abuse, loss or damage the ill-treatment or the impairment of health or development of an individual by action or omission in respect of another. Harm may be physical, intellectual, emotional, social or developmental and for the purpose of this Policy it may also mean the *threat* or *risk* of harm. Definitions of harm may differ from territory to territory and as such where required the locally recognised legal definition will be applied.

Participant(s) – refers to any person who takes part in an activity and may include (but not limited to) being a spectator or a player at a match or event, taking part in a sport coaching or educational activity, engaging with the club through social media, or being part of a junior membership scheme.

Partners – this refers to any organisation linked by agreement to one or more of the Group's companies and may include sponsors, commercial partners or contractors.

Parental Responsibility (PR) – refers to those individuals with legal responsibility for a specific child. Where consent is required in respect of a child taking part in Group-related activities, or reporting a concern, we will take all reasonable steps to identify the person(s) with legal PR for that child. Where identifying PR is complex or disputed (not all parents have PR and not all people with PR are parents) we will seek consent from the biological mother or father or adoptive 'parents' unless otherwise instructed by a higher authority. We will also encourage relevant information to be shared amongst all individuals involved in the care of that child by those with PR.

Safeguarding - Safeguarding is a term which is broader than 'child protection' and relates to the action the commission take to promote the welfare of children and protect them from harm. Safeguarding is everyone's responsibility. Safeguarding is defined in the UK in the government guidance "Working together to safeguard children 2015" as: protecting children from maltreatment; preventing impairment of children's health and development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and, taking action to enable all children to have the best outcomes. Child protection processes are part of an effective safeguarding framework.

(Other) Vulnerable Person / People - this refers to adults (those who are 18 or over in most countries) who may have some form of additional vulnerability (including, but not limited to: disability, intellectual vulnerability, mental health conditions, homelessness and drug addiction) and as such may be in receipt of state care and require additional support to participate in Group activity. In the UK the Government recommend use of the term "Adult at Risk" but they have sometimes been referred to as Vulnerable Adults. This may also mean an adult who because of their situation (e.g. an accident, injury or excess alcohol use) becomes vulnerable whilst in our care. The Group recognises that the legal position in respect of adults is complex and any Safeguarding intervention may require the consent of the individual prior to any action being taken.

Workforce – this refers to any person, employed or deployed, by managers to work on a paid or voluntary capacity on a Group activity. Such individuals may be full or part-time, permanent or fixed term staff employed directly by the Group; they may be deployed by the club on a temporary or casual basis; or they may be volunteers deployed by management; they may be deployed via a third party contractor, grantee, licence holder, or partner.

Safeguarding Policy Statement

Providing a safe and positive environment is a vital aspect of any business's operations. The City Football Group takes its responsibilities very seriously in this regard and in particular where children or other vulnerable people are present at any of its Group-led activities and in the **care of one or more members** of our workforce.

All participants and visitors to these activities have the **right** to feel safe **and** to be safe. Wherever they come into contact with us they will be treated both lawfully and fairly and with both dignity and respect. All the members of our workforce have a **duty** to keep children and other vulnerable people safe and to help protect them from abuse or harm. All managers must ensure that their workforce **understand and apply** that duty wherever they are in the world.

Good safeguarding practice takes many forms. It is a thread that must weave *throughout* all Group activities that involve children and other vulnerable people. It should always be there but be proportionate and should allow the core business to flourish.

This policy applies to all members of the City Football Group, from both the paid and volunteer workforce, and all partner organisations including commercial partners, licence holders, contractors, consultants and Grantees. It also applies to individuals not included in this list who may be conducting related work that involves the children in our care.

Safeguarding Context

The term safeguarding is a shortening of the phrase "safeguarding and promoting the welfare" of children, young people and adults. The concept may use different terms in different countries such as 'child protection' or 'risk management'.

A safeguarding programme broadly means:

1. Creating a positive environment for all participants and workforce;
2. Protecting all children and other vulnerable people from maltreatment, abuse or harm or fear of those;
3. Ensure children are healthy and may develop and grow;
4. Ensuring that staff comply with law, regulations and established good practice when working with these participants;
5. Having ways to report concerns and know that they will be taken seriously; and
6. Having a clear and robust strategy, policy and related processes to ensure the above.

National & International Frameworks

Our Group safeguarding programme will seek to work within the guidance provided by the "International Safeguards for Children in Sport" framework and in conjunction with the local frameworks found within any country where our workforce is conducting business or charitable activities (see note relating to *Cultural Sensitivity*; page 6).

Purpose of this Policy

By implementing this policy across all Group operations, all members of the workforce will understand that they all have a responsibility to work together to safeguard vulnerable people and that:

1. the individual's safety and welfare is the first consideration, particularly where children are involved;
2. all people, regardless of age, gender, racial origin, political or religious belief, sexual identity and or disability, have a right to enjoy sport, and associated activities of the CFG, free from abuse and all forms of bullying, harassment and discrimination;
3. all individuals and organisations involved with the CFG have responsibilities for the welfare of children and other vulnerable people in our sport and are bound by this policy; and
4. all individuals and organisations involved with the CFG must act in accordance with the law in relation to such matters.

For CFG operations it also means: supporting 'Safer Recruitment' processes through promoting good practice for those working amongst our workforce; supporting them where necessary; ensuring staff are competent, well-managed and challenged when engaged in poor practice; and, finally, taking action where concerns arise.

Our Global Safeguarding Framework

This policy is the basis for a Group global safeguarding framework, known as SafeAtCity, that seeks to implement a clear and effective programme of work that is embedded across the workforce.

Our Safeguarding Vision:

A truly global, world-leading, safeguarding in sport programme.

Our Safeguarding Aims:

1. A safe and welcoming environment for children and other vulnerable people involved in any Group-led activities, wherever they are in the world, free from abuse and fear of abuse in all its forms;
2. A culture where safeguarding practice is widely understood, openly discussed and where the workforce recognise the role they play in keeping children, other vulnerable people, themselves and their colleagues, safe from harm;
3. A clear system which promotes and 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;
4. To apply legislation, government policy & guidance, and football governing body regulations, policy and guidance where applicable; and
5. To work closely together with local statutory agencies and other partners to promote and safeguard the welfare of children and other vulnerable people.

In order to realise these aims we will:

- **Work or liaise with relevant football governing bodies, statutory agencies and other child welfare bodies** (e.g. Child Protection in Sport Unit in the UK, SafeSport in the US, Australian Sports Commission in Australia) to ensure we meet all necessary regulations and standards in respect of our safeguarding practice;
- **Listen to children and other vulnerable people** and take them seriously, consult with them when developing processes and react appropriately to ideas, feelings and concerns then address them in a fair, effective and timely manner;
- **Develop and communicate a series of clear policies, protocols and guidance** designed to help deliver sound governance and good practice across the Group's activities;
- **Create and co-ordinate an effective network of designated Safeguarding Officers** across the Group who will work closely with internal player welfare providers;
- **Maintain a visible Safeguarding presence** across all areas of the club including Group internet platforms;
- **Monitor activities** taking place at CFG facilities and those at off-site locations;
- **Provide training, advice and support** across all areas of the business where children and other vulnerable people are involved in any Group-led activity;
- **Support and help deliver the Group's 'Safer Recruitment' philosophy** in accordance with local legislative and regulatory requirements and in partnership with the human resources departments;

- **Maintain confidentiality** of all information and documentation relating to criminal record disclosures, concerns, allegations and incidents in accordance with relevant data protection legislation;
- **Share sensitive information with the relevant authorities** when it is appropriate to do so and in the knowledge that the information will be treated confidentially.
- **Prepare annual safeguarding reviews** covering each strategic element of the Group; and
- **Work in accordance with the “International Safeguards for Children in Sport”** and seek formal recognition once an accreditation scheme is in place.

Who will we work tirelessly to keep safe?

To illustrate the scope of this work the list below provides an extensive list (though not exhaustive) of examples or situations across the Group where we need to consider the welfare of people in our care:

- Players involved in academy or associated development programmes;
- Under 18 players who are part of open-age/senior squads;
- Children and other vulnerable people taking part in community foundation activities;
- Some disabled supporters and other vulnerable people contacting the clubs, visiting the stadiums on match days, or visiting for other pre-arranged activities (e.g. stadium tours);
- Homeless people, people with mental health or health issues, or young offenders taking part in community foundation-based programmes;
- Young players on tour or living for significant time away from their families in Group-arranged accommodation;
- Any children visiting the Group’s stadium’s for matches, events, concerts or tours;
- Ball boys & girls, match-day mascots and flag-bearers;
- Support to those who may be vulnerable to bullying or cyber-bullying through their relationship with any of the companies within in the Group;
- Participants on commercial football school-type programmes or similar;
- Young people attending as volunteers or on organised work experience;
- Disabled children and disabled adults taking part in any group-organised activity; and
- Children or other vulnerable people involved in activities organised by other agencies benefitting from the Group’s charitable programmes.

Safeguarding Considerations for Children and Adults with Additional Vulnerability

Cultural Sensitivity

CFG recognises that whilst the law in most countries seeks to protect children, cultural practices may differ markedly. Our staff must be aware of and sensitive to cultural differences. Where members of our CFG workforce are working with children or commissioning others to do so, our safeguarding practice must be applied. We may also use the International Safeguards for Children in Sport to promote appropriate practice.

Where activities are beyond our direct control we may have to use our discretion to address any concerns. It is hoped that our approach may help to influence decision-making in places where vulnerable people are not afforded the same levels of protection as found in the United Kingdom.

Age Sensitivity

The term 'children' covers individuals from birth up to their 18th birthday and this policy covers this entire age range. As a general principle we will also be sensitive to the developmental maturity of children in our care and ensure that this is taken into account when decisions are made that affect them. We will particularly encourage older children to have more involvement and take more responsibility when decisions are being made that affect them.

Open-Age Players

From time to time players who are not yet 18 will either train or play in adult or 'open-age' teams. This may be a temporary or developmental arrangement, or it may be a permanent contractual arrangement. The decision to do this is not taken lightly and will be taken based on the physical and emotional capacity of the player and in conjunction with the players parents. Special care will be taken to monitor the welfare of the players that are placed in these positions.

Safeguarding Elite Athletes

City Football Group draws elite men, women, boys and girls into its talent development programme. Athletes in the high performance pathway face additional vulnerability due to their position in sport. Others may seek to gain advantage (financial or otherwise) or gratification from their talent or enhanced profile through unscrupulous means; some may abuse or coerce them just because they can (eg. via social media). The players themselves will experience the constant pressures of being an elite athlete and as such all staff must be vigilant of the signs and symptoms of issues such as: abuse by those in positions of power or influence over the athlete; poor mental health; homesickness; eating disorders; addiction; self-harm and other conditions that may manifest themselves.

[more information on this matter can be found: <https://thecpsu.org.uk/download/media/2047/safeguarding-the-elite-young-athlete-feb-11.pdf>]

Additional Vulnerability

'Children' are often easily identifiable. Additional vulnerabilities are not as easy – such as disability, ethnicity or sexual orientation for example – and may have the potential to make an individual more vulnerable. People with additional vulnerability are often even more difficult to identify and provide for. It is a priority for the Group to safeguard the welfare of both children and other vulnerable people when they are in our care and once a vulnerability has been identified.

Language & Communication

Some people taking part in our activities may not use English as their first language or may experience difficulty communicating with our workforce in the usual ways. As a principle we will always be patient and try to communicate in an individual's chosen way and where necessary and practical we will use an interpreter (i.e. foreign language) or communicator (e.g. sign language).

Children from Overseas

We will come into contact with children who have moved – temporarily or permanently - from their country of origin. This policy applies equally to them. We will ensure that where this situation does arise, international law and football regulations are correctly applied and that the needs of the child are put first and any arrangements are made in conjunction with those with Parental Responsibility for that child. Where we have a concern that a child may be at risk of harm, or may be being exploited or 'trafficked', the appropriate authorities will be informed at the earliest opportunity.

Children Overseas

As CFG comprises a number of companies and football clubs who organise, commission or manage activities in their home country and abroad, those activities that will involve children and other vulnerable people are covered by this Policy include:

- Elite young players from First Team to Academy age-group squads on trips and tours;
- The 'City Football Schools' commercial coaching activities in world-wide locations;
- 'City in the Community' or 'City Foundation' activities at home or overseas; and
- Club operations such as youth academy, community projects, commercial football schemes, or partnership activation activities.

A global operation requires a global perspective on safeguarding matters. CFG is committed to safeguard the welfare of participants wherever it operates. Where practical the workforce, including staff, volunteers, contractors, and licence-holders will apply this policy, our principles and recognised best practice to local arrangements. We will also apply where appropriate local legislation, regulation and practice and build relationships with those agencies who have local responsibility for children and other vulnerable people.

Consultation

Where appropriate we will consult with children and other vulnerable people and their parents or legal guardians in order to understand their needs, concerns and wishes so that these may help shape Group policy, procedure and practice.

Standards of Behaviour - Children

We want children to enjoy themselves when they are attending our activities. We do however expect children to behave in a way that is appropriate to the age, maturity, type of activity and in a way that does not endanger or upset others. Where possible these expectations will be developed in conjunction with the participants themselves and communicated to all those taking part.

In areas of the Group operations where player (or participant) disciplinary procedures are adopted these procedures will be communicated to all those whom they relate to including those with parental responsibility for a child participant.

The Group does not condone activities such as bullying, hazing, abuse or victimisation. Where such activity is suspected, reported or uncovered, this will be fully investigated and dealt with at the earliest opportunity.

Managing Behaviour

The Group and its companies will have a positive approach to behaviour management and where necessary develop policies that the workforce must apply. Such policies will recognise the following general principles:

1. Every person is different and as such has individual needs;
2. Participants should be encouraged to help develop their own codes of conduct or have clear and well communicated guidance on expectations;
3. Behaviour is usually a reflection on how a person is feeling;
4. Staff should recognise that many other factors can effect behaviour – weather, hunger, medical conditions, medication and account for these in any action taken;
5. Challenging, aggressive or violent behaviour presents risks to the individual and others, and physical intervention with any individual displaying such behaviour is only ever a last resort in exceptional circumstances – any response must be reasonable and proportionate¹
6. Training will be provided to members of the workforce who may experience challenging behaviour;
7. Physical punishments will **never** be used by our workforce, though diffusion and de-escalation techniques may when necessary; and
8. All significant incidents should be recorded and passed to the Safeguarding Officer and/or Safety Officer (on match days).

Data Protection

The Group takes the matter of Data Protection very seriously and particularly the data collected in respect of children or other vulnerable people. The Group will apply relevant local legislation in respect of their data collection activities.

Where data is collected (in writing or electronically) relating to children, or children are asked for personal details, we will make every effort to obtain consent for its use from those with parental responsibility. We will seek parental consent if the collection or use of information about a child is likely to result in:

- disclosure of a child's name and address to a third party, for example as part of the terms and conditions of a competition entry or partnership activation;
- use of a child's contact details for marketing purposes;
- publication of a child's image on a website that the public can view;
- making a child's contact details publicly available (though this should never happen); or
- the collection of personal data about third parties, for example where a child is asked to provide information about his or her family members or friends.

¹ See UK Government "Use of Reasonable Force" advice document, July 2013

Photography & Video Image

Celebrating Activity

The Group welcomes photographs and images that celebrate the sport, the values and objectives of the Group, and positive reflections of our Group operations. We understand however that photography and video imagery and its use can present difficulties, risk and sensitivity in a range of circumstances.

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 (see also *Consent* below). These images may then be used by Group staff and contractors in both internal and external news and marketing publications and on-line via web-sites and social media.

Data Protection Law & Photography

Data protection law may apply to the photography of children or other vulnerable people at CFG activity. Where it applies and where practical, if images are captured by a member of the workforce or for Group business purposes, consent from the parent or carer should be obtained and the option to opt out is available. If in any doubt a picture should not be taken (also see *Implied Consent*).

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 should be 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 may be 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 a wider distribution of the images that originally anticipated.

Consent

Where an activity may allow for the capture, and thus use, of a participant's image, the manager 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 a vulnerable adult) and ensure that those individuals understand what they are consenting to and why.

Opt Out

Other than on match/event day (see below), individuals have the right to opt-out (i.e. revoke or not give consent) of being photographed. Here our workforce will endeavour to make suitable arrangements to apply any restrictions required whilst also minimising the disruption to normal Group operations. These arrangements will be agreed in advance with those with Parental Responsibility for the player and must uphold the dignity of the participant opting out.

Storage

All images, whilst held by the Group, will be securely stored on the clubs' IT systems and remain the property of the Group 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 Group'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, Events, Incidental Image Capture & Implied Consent

Large crowds create further issues with consent and image use. At events such as matches, concerts and special events, consent is assumed to be 'implied' in that any person attending should expect that their image may be captured or broadcast. As such this should be included in ground rules or ticket terms and conditions. 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 Group recognises that in some circumstances parents, other family members and friends may wish to take photographs of their children or relatives. Each site will develop clear rules on what is acceptable. Where a member of staff or child or parent has a concern about the capture and use of images they should report immediately to the activity or site manager.

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 avoid:

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

All Group companies and their partners, licence holders and grantees must publish their own photography policy and site rules.

CFG Charitable Grantees

Policy Requirements

The Group and its charitable foundations make charitable awards to other organisations in order that those organisations may deliver programmes to their target groups.

The Group requires that all its Grantees demonstrate their own clear and effective safeguarding programmes and procedures. They must show that measures are in place for implementation, training, communication, monitoring and review of the Policy and associated processes.

Where a Policy is not yet in place, a clear plan must be developed to create a policy and associated procedures (i.e. safe recruitment, induction & training, and dealing with concerns) within six months of the award being made and demonstrate how the welfare of participants will be safeguarded ahead of the policy being produced. Grantees who fail to develop appropriate safeguarding programmes within 6 months of an award will have their funding suspended until these are in place.

Such procedures should be aligned with the International Safeguards. Grantee's policies and procedures, or their plans to develop these, are a condition of funding and will be monitored during the grant management cycle.

Grantees must have clear protocols for managing complaints, concerns, incidents and allegations. They are required to report any significant incidents or allegations related to any part of their organisation, its workforce or activities, at the earliest opportunity to the project manager at the City Football Foundation.

Safeguarding Support for Grantees

The Group will, where possible, endeavour to provide introductory support to grantees in order that they can develop and implement robust safeguarding policies and procedures.

Residential Accommodation

The Group may, in the course of its activities, be required to provide both short and long term accommodation for young or vulnerable participants. This may occur in a range of settings and may be arranged by or involve Group staff, such as:

- trips and tours involving overnight stays for children or other vulnerable players;
- academy players living in club facilities or in domestic settings with approved host families;
- young players on trial with academy teams;
- children and/or other vulnerable people participating in commercial football programme activities (e.g. City Football Schools);
- children and/or other vulnerable people participating in foundation or charitable programmes or projects
- commercial activities delivered in partnership with third party operators responsible for the provision of accommodation; and
- partnership activation activities involving children.

It is vital that wherever such situations arise that the highest level of diligence is provided to the arrangements. Managers must ensure that all applicable *legislation, regulation and*

good practice (from that host country) is applied to any of the above settings and that any relevant authorities are consulted with throughout the planning and operation of these provisions.

The same level of diligence is required where a third party is responsible for making accommodation arrangements for vulnerable people in our care. It is the responsibility of our staff to ensure that third party operators maintain our high standards of care.

Selection of Carers

The appointment of any staff or carers with responsibility for the supervision of children overnight in residential settings must be carried out in accordance with this policy and must apply Safer Recruitment principles to ensure suitable appointments are made.

As a minimum these staff must:

- undertake the appropriate criminal record check (eg Enhanced DBS in the UK)
- supply at least two references
- have their qualifications and references checked
- have completed appropriate safeguarding training and/or residential care training

Policy & Risk Assessment

Risk assessment protocols must be carried out on any residential setting used and this should be reviewed every 12 months and be available for inspection at any time. These must include Health & Safety and Safeguarding assessments. Where the accommodation is a commercial property the commercial operator must supply details of their insurance, service records (e.g. gas appliances) and their own risk assessments.

Host Families

Where host families are accommodating young players over any time period, the household should be assessed and approved using the 'Quality Standard' assessment framework prior to players being hosted. This involves:

- a minimum of two suitability assessment visits;
- a minimum of three staff having visited and approved;
- completion of the internal host family assessment forms; and
- a fire safety visit carried out by the local fire service.

Once a host family is accepted onto the programme they will be visited at least once during the first month of a hosting agreement and will have at least one further visit each year during the period of the agreement. It is expected that contact will be made with each host family on at least one occasion each week during a period of hosting.

Where young players are hosted for long periods of time away from home and family, staff must consider the need for registration with the local authorities and make any referral as appropriate.

Trips, Tours and Hotels

Where groups of participants require overnight accommodation during a trip or tour the above risk assessment rules apply and staff should visit the venue in advance to conduct the assessment.

There must be a Trips And Tours Policy (or similar) in place for that Club or department and compliance with the policy be evident for each tour. An experienced (and if necessary qualified) Tour Leader should hold overall responsibility for the tour group.

Safeguarding & The Group's Workforce

Safeguarding is also about ensuring that all staff, volunteers and partners understand the role that they play in protecting vulnerable people. Across the Group there will be a wide range of employment and deployment arrangements involving full-time or part-time permanent staff, consultants, sessional staff or volunteers.

The workforce are what make this policy 'live'. This means all members of the workforce who are involved in training, managing, supervising or caring for children or other vulnerable people, and in particular:

- Coaches & Managers
- Football scouts
- Medical staff
- Stewards
- Drivers & Security
- Host Families
- Hospitality
- Tour Guides
- Private tutors
- Players
- Managers
- Junior Membership
- Partners, licence holders & their staff

They must work conscientiously to help keep those in their care safe from harm. They must also be aware of how to keep themselves and their colleagues safe from having allegations made against them by maintaining professional boundaries and avoiding behaviour that may be misinterpreted by others. In turn this has a direct impact on maintaining the reputation of the Group and its companies.

Safeguarding Code of Conduct

The Group has published a Safeguarding Code of Conduct which applies to all individuals who work or volunteer with children and other vulnerable people on any Group-led activity. The code of conduct is presented as Appendix 3.

Safer Recruitment

Those who apply for a role that involves working closely with children (and in some cases vulnerable adults) on any of our activities will be subject to 'Safer Recruitment' principles relative to the mandatory systems in place in that country. As a minimum they will require a criminal record certificate (or check or similar) from the national or local authorities (such as Disclosure & Barring Service checks in the UK or Working With Children checks in Australia) if such checks are available. We will also take and follow up on references, check qualifications and licences, and where necessary conduct medical checks.

Each entity within the City Football Group must publish its own criminal records vetting procedure in accordance with local legislation and/or practice.

Safe Working Practice & Good Conduct Guidance – Working With Vulnerable People

Unless guidance from other agencies is more suitable, the Group applies the best practice guidance from the English Premier League: "Guidance for Safe Working Practice (for the protection of children and adults at Premier League clubs)". This guidance is applicable to any football club setting and as such the guidance contained therein is applicable to all members of the Group. Any breach of this policy or those guidelines will be treated very seriously and may result in disciplinary action or referral to statutory agencies.

Positions of Trust

As a result of the roles and authority that many members of our workforce hold, they are considered to be in a Position of Trust in relation to those in their care. This means that where staff, or other members of the workforce, are in a position of power and influence over children or other vulnerable people they must not abuse their position for personal advantage or gratification or that of others.

Staff must also report any concern they have about another member of the workforce to a designated safeguarding officer. Each company in the group must have a published policy (or adopt a central policy) in respect of whistle-blowers and this should identify the process of reporting concerns and must protect staff from victimisation following a reporting of a concern.

Age of Consent, Children and Positions of Trust: The laws regarding the age of consent for sexual activity differ from country to country and are often lower than 18 (Aus = 16, UK = 16, US = 16-18 dependant on state, some EU are 14 or 15). This policy considers a child to be someone who is not yet 18 and as such any emotionally dependent, intimate or sexual relationship between a member of the workforce and a *child* in their care is prohibited and will be subject to disciplinary action. A breach to this rule is considered an act of gross misconduct and will result in a referral to the relevant statutory agency in countries where the law may have been broken. Any resulting disciplinary ruling will be applicable across the Group.

For the absence of doubt, this applies to members of the workforce and participants who may have travelled overseas from their country of origin or those travelling abroad as representatives of the CFG.

Standards of Behaviour - Adults

Our workforce will adopt the highest standards of behaviour at all times in order that they will maintain the confidence and respect of children, other vulnerable people parents, customers, supporters and colleagues. Within the scope of their duties their actions should always be reasonable, appropriate, warranted, proportionate, safe and applied equitably.

Whistleblowing

Members of the Group's workforce should also act where concerns are raised about the behaviour of others – meaning other members of the workforce or participants (children or adults) on Group activity. Failure to act is contrary to this policy and may be subject to disciplinary action.

Information and Communication Technology (ICT)

ICT is used across the group of CFG companies in many and varied ways. Its use will continue to grow and change with new developments in technology and fashion. It is used to communicate with supporters, customers, players and the media. The Group's companies will:

- develop and maintain clear policies on suitable and appropriate use of internet, email, SMS, and social media;
- expect the workforce to only use Group issued equipment, emails and software to communicate with participants;

- ensure that **consent of parents** is obtained if staff will use SMS, email or other electronic means of communication with a child for programme-related reasons
- raise awareness amongst young participants (especially youth academy players) regarding safer internet/social media use in respect of their position;
- raise awareness, through training and internal communications, with the workforce regarding appropriate use of such media and the importance of both professional and personal online activity;
- have a zero-tolerance approach to 'cyber-bullying'; and
- respond quickly and appropriately to inappropriate use of the internet and social media by players and members of the workforce.

Training

Safeguarding personnel will receive training across most areas of the safeguarding landscape, such as: good practice, e-safety, disability, neglect, domestic violence, gang culture, substance misuse, exploitation, radicalisation and people trafficking.

In turn the safeguarding officers will offer support and training to other staff who may be faced with those issues and concerns through their day-to-day work with children or other vulnerable people.

All new staff joining the workforce will complete a detailed induction to the club and this will include suitable safeguarding training relevant to their role. We will also work with players and parents to raise awareness of safeguarding issues that may affect them (such as social media issues).

Consent

The Group's management recognise the importance of approaching the individual needs of children and other vulnerable people in the appropriate way and according to the law and statutory guidance.

Where a child is at risk of harm, consent to act on concerns is not normally required in law although consent from and consultation with those with Parental Responsibility is considered good practice unless this would put the child at greater risk of harm.

Consent & Best Interests

Children: We will always respect the right of a child to have their say when a decision that affects them is being taken. We will take their views into account and always act in their best interests when a decision is made, especially when a child is at risk of harm or may have come to harm. A child's parent will also be consulted and consent obtained as a matter of course before any action is taken unless this may put the child at increased risk of harm. Care should be taken to seek and establish the consent of all those with Parental Responsibility for that child. Where a parent or legal guardian cannot give consent at a point where it may be required, group staff will always act in the best interests of the child.

Adults: If an adult who may be at risk of abuse *has* the capacity to consent then they *must* have the opportunity to consent before a decision is made that affects them – eg. passing on a concern to statutory agencies. Group staff will assume that an adult has the capacity to consent unless it is established that they lack this capacity. **A seemingly unwise decision should not be mistaken as lacking capacity.** We will always act

swiftly (and possibly without consent) where the individual is put in immediate and significant risk of harm and always act in their best interests.

Best Interests: Any decisions taken on behalf of someone who is deemed, at the point where a decision must be made, to *lack* capacity or unable to give consent, will be taken in his or her best interests. Where possible, Group staff will take into account (known) past or future wishes and religious or moral beliefs.

Raising concerns

Safeguarding concerns fall into one of the following types:

1. the behaviour of an adult towards a child;
2. the behaviour of a young person towards other children (including bullying by peers);
3. risks identified through recruitment processes (e.g. criminal records information);
4. information about an individual provided by statutory agencies or other route;
5. allegations of abuse; or
6. concerns about harm to a child that has taken place *outside* of a Group activity (e.g. at home or school) but identified *within* a Group activity.

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

Raising Concerns & Mandatory Reporting

If any member of the Group's workforce has a concern about a child or other vulnerable person they have a duty to refer this to a member of their specific organisation's safeguarding team. A safeguarding officer will in turn report any concerns to the appointed lead safeguarding officer (or appointed deputy). If there is immediate risk of harm, a serious injury, or a criminal offence may have been committed, then the police or other emergency services must be involved at the earliest opportunity. A flow chart presents the course of action in Appendix 1.

Where a very serious concern is raised that involves a child or adult involved in Group-led activity or a member of the workforce is involved in an allegation against a vulnerable person, the board/Leadership Team member with responsibility for safeguarding must be informed.

In some countries, including the US and Australia, there is a legal requirement known as Mandatory Reporting in respect of the suspected abuse of children and often these vary from state to state. Group staff are required to ensure that these legal requirements are met where applicable.

[In the UK, the Government have produced a useful guide if you are worried that a child is being abused:
<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>

In Australia, the Government have produced a similar guide:
<https://aifs.gov.au/cfca/sites/default/files/disclosure-infographic.pdf>]

Whistleblowing

The Group views the reporting of concerns by members of the 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 has been breached by another member of the workforce. Such reports may be made to the HR department, to a safeguarding officer or a line manager and, where appropriate, the information will be shared. Failure to do so may result in disciplinary or criminal action.

Referral Management

Where a concern is raised relating to the behaviour of a member of staff towards a child or another vulnerable participant there is a need to manage that referral in a swift and confidential manner.

Where the concerns could be of a criminal nature a referral to the police or social services should be made at the earliest opportunity.

Each club or company within the Group may develop its own “Referral Management Group” (RMG). This is not mandatory but may help in certain circumstances. Guidance of the development of such a group or process can be obtained from the Head of Safeguarding.

The RMG will:

1. not replace an immediate referral to the emergency or statutory agencies where a potentially criminal offence has taken place (see appendix 1);
2. not replace, but work in tandem with, the club’s staff disciplinary policy ;
3. meet at the earliest convenience and need not necessarily meet face-to-face;
4. comprise a minimum of three people; from
 - a. Head of Safeguarding
 - b. club designated safeguarding manager and/or officer
 - c. HR representative where a member of permanent staff is involved
 - d. a member of the club’s senior management or appointed deputy;
5. Protect the identity of the complainant where requested or appropriate (though this is not always possible for the complete duration of the disciplinary process or where criminal investigation is required);
6. Consider the suspension of any member of the workforce (through HR);
7. Appoint an (internal) independent investigator where one is required;
8. Keep the complainant informed over the progress of the referral unless this may jeopardise the fairness of the process; and
9. Record and store in a confidential manner, the details of the matter and any meetings relating to the referral.

The RMG will consider the facts of the concern or allegation and may either:

- refer to HR or line manager, and/or to the clubs disciplinary policy process;
- conduct its own investigation (and in particular where the ‘accused’ is not permanent staff) using an independent member of staff;
- make an external referral to statutory agencies; or
- take no further action.

Where an investigation has taken place and the RMG must consider the evidence presented to them, the burden of proof used to decide on an outcome will be ‘balance of probability’ (i.e. more than 50% certain) in accordance with civil proceedings.

Record Keeping & Confidentiality

The company will keep a record of all incidents and concerns reported to its Safeguarding team. Any such reports will be taken seriously, treated with respectful uncertainty and carefully recorded, acted upon where appropriate, and confidentially retained. Records will be regularly reviewed 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 local data protection legislation. They may be required to report or refer these matters to another agency such as a sport governing body or local authority.

Criminal Investigations & Social Care Services

Where serious concerns are raised and/or a criminal offence may have been committed then it is not the responsibility of staff to determine if abuse has taken place. Any criminal investigation should not be impeded by an internal investigation.

The police and/or local authority may involve club staff in any investigation procedures where abuse is suspected. Where the police decide that they will not take any further action then the local authority may still proceed with an investigation in conjunction with Group staff. The role of Club staff or the Safeguarding Officer is simply to pass the information on to the relevant person or agency.

Where both the police and social care services have decided to take no further action then the company may undertake an internal investigation in accordance with Group disciplinary and/or RMG procedures.

Referrals to Barring Agencies

In some countries, if a member of staff is removed (or resigns before being removed) from their role as a result of an allegation or investigation conducted under this policy, and the necessary criteria are met, a referral to that country's barring agency (eg. The Disclosure & Barring Service in the UK) will be made in conjunction with the appropriate statutory agencies.

Appendix 1: Responding to a concern, incident or allegation.

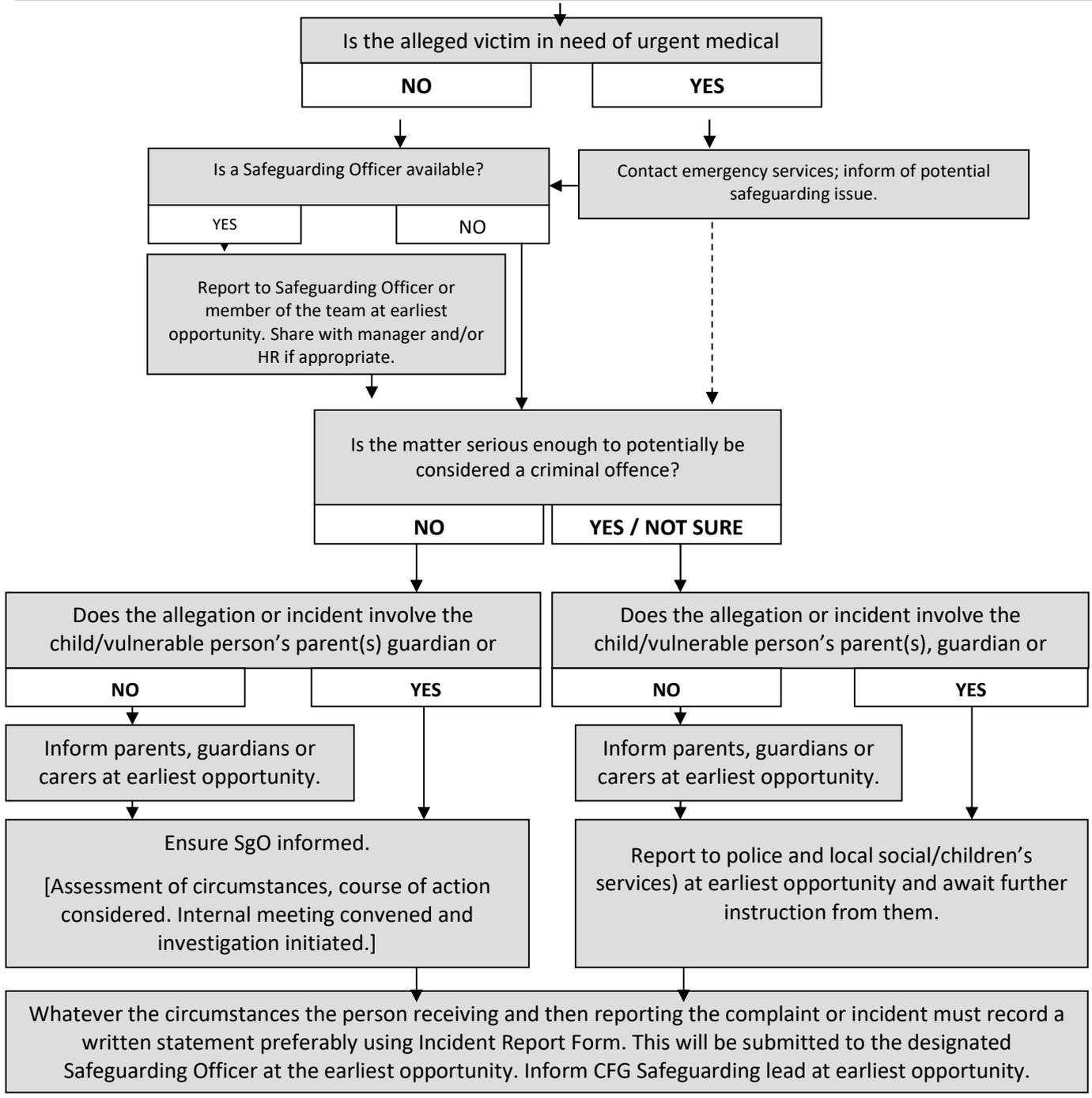
Responding to a Concern, an Incident or an Allegation

The flowchart presented below details the immediate response to an incident or concern involving a child or other vulnerable person.

A child or other vulnerable person* has disclosed concerning information to you OR you have witnessed or had reported to you an incident or complaint involving a child or other vulnerable person*, which may be considered abuse or poor practice.

**It is essential when considering an incident or concerns involving an adult who may be vulnerable to obtain the consent of that adult before referring the matter to a statutory agency, unless there is an immediate risk of harm.*

STAY CALM – REASSURE – TAKE SERIOUSLY – NO PROMISES – FEW QUESTIONS – FOLLOW GUIDE



Appendix 2: What is abuse and what things might raise concerns?

Children and Abuse

In respect of children, the Football Association of England defines abuse into five categories. These help to explain what abuse and harm is. The categories are based on the Working Together 2015 mandatory guidance published by the UK Government. They also form the foundation of the “International Safeguards” framework and are: **neglect, physical abuse, sexual abuse, emotional abuse, and bullying**. The CFG recognises ‘hazing’ as a form of abuse; this is a term that originates in the United States but is becoming more widely used.

The Group have adopted this framework and also considers that these categories also apply to adults who may have additional vulnerability but a more detailed explanation in respect of adults is presented below. The Group also considers financial abuse and fraud as further risks that may apply to both young professional players and adults.

Neglect

Neglect takes place if adults fail to meet a child or young person’s basic physical needs, e.g. for food, warmth and clothing, or emotional needs such as attention and affection. It occurs if children or young people are left alone or inadequately supervised or where they are exposed to danger, injury or extreme weather conditions.

In Group activities, neglect could occur if children or young people do not have proper supervision, clothing or are allowed or encouraged to play whilst injured. It could occur if a child or young person’s needs are disregarded before, during, or after a game or training.

Physical abuse

Physical abuse occurs if people physically hit, burn, poison, shake or in some way hurt or injure children and young people, or fail to prevent these injuries from happening.

In sport, physical abuse could happen where training methods are inappropriate for the developmental age of the child or young person, where they are allowed to play with an injury or where inappropriate drugs or alcohol are offered or accepted. It would clearly happen if a child or young person is hit or physically restrained or manhandled by those supervising the game or training session.

Sexual abuse

Sexual abuse occurs if children or young people are used to meet another person's sexual needs. This includes any form of sexual behaviour with a child or young person (by an adult or another child or young person), the use of sexually-explicit language and jokes, inappropriate touching and exposure to pornographic material.

Sexual abuse can occur in sporting settings. For example, where there is inappropriate touching, or where sexually-explicit jokes occur between adults and children or young people or if indecent images are taken or adapted and placed on child pornography sites.

Emotional abuse

Examples of emotional abuse include frequent threatening, taunting or sarcastic behaviour, along with with-holding affection or being extremely over-protective. It includes racist or sexist behaviour and demeaning initiation ceremonies. It can be inflicted by other children and young people as well as by adults. Children and young people who are being abused or bullied in any way will also experience emotional abuse.

In sport, coaches or parents emotionally abuse children and young people if they constantly criticise, abuse their power, or impose unrealistic pressure to perform to a high standard. It may also occur if a club allows members to deride people with disabilities or from minority cultures and use derogatory language about them.

Bullying & Hazing

Although anyone can be the target of bullying, children and young people who are perceived as “different” from the majority may be at greater risk of bullying. This includes children and young people from minority cultures or children and young people with disabilities. Victims are often shy and sensitive and perhaps anxious or insecure. Bullying can be defined as:

Physical: hitting, kicking and theft

Verbal: name calling, constant teasing, sarcasm, racist or homophobic taunts, threats

Emotional: tormenting, mobile text messaging, ridiculing, humiliating and ignoring

Sexual: unwanted physical contact or sexually abusive comments.

Bullying can take place anywhere, but is more likely to take place where there is inadequate supervision. In sport it is more likely to take place in the changing rooms, or on the way to and from the pitch - but can also take place at a training session or in a competition.

Hazing involves coercing, requiring, forcing or wilfully tolerating any humiliating, unwelcome or dangerous activity that serves as a condition for joining a group or being socially accepted by a group's members.

Sport's competitive nature can create and even support an environment for the bully if individuals and clubs are unaware. The bully in sport can be a parent who pushes too hard, a coach or manager who has a win-at-all costs philosophy; a child or young person intimidating another; or an official who places unfair pressure on a child or young person. The victim is often weaker and less powerful and the outcome is always painful and distressing.

Signs and indicators

Children and young people are reluctant to tell someone when they are being abused, so it is essential that every adult is aware of the possible signs and indicators that a child and young person's welfare or safety is being threatened. However, there is rarely a clear sign and you may often have to piece together various snippets of information and rely on your instinct that something does not seem quite right. Never allow a child or young person's disability or cultural difference to explain away concerns.

You may have one piece of information that, when added to that of others, forms a clear picture of abuse. This is often compared to fitting pieces of a jigsaw together. Only when you have a few pieces can you start to see the true picture. Remember, it is not your job to decide whether or not a child or young person is being abused - however it is your responsibility to share your concerns.

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.

Adults and Abuse

CFG activities may include adults. In particular adults will be present at match day events, other large scale events and some foundation activities. The Group's staff have a duty to refer any concerns they may have about an individual, group or an adult who works with adults who may be vulnerable or at risk of harm.

In the UK, the Care Act 2014 provides a useful list of different categories of abuse that adults may be subjected to these are:

- *Physical abuse* – including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.
- *Domestic violence* – including psychological, physical, sexual, financial, emotional abuse; so called 'honour' based violence.
- *Sexual abuse* – including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.
- *Psychological abuse* – including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.
- *Financial or material abuse* – including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
- *Modern slavery* – encompasses slavery, human trafficking, forced labour and domestic servitude.
- *Discriminatory abuse* – including forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion.
- *Organisational abuse* – including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home.
- *Neglect and acts of omission* – including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating
- *Self-neglect* – this covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

Appendix 3: Safeguarding Code of Conduct

City Football Group Safeguarding Code of Conduct

Everyone plays a role in safeguarding the welfare and development of children and the protection of other vulnerable people. As an individual responsible for children or other vulnerable people taking part in a City Football Group activity you have a duty to:

- **Ensure that the safety and welfare of all participants is your first priority** and ensure that any planning, preparation, delivery or review reflects this duty and all actions are in the best interests of those in your care.
- **Treat children and other vulnerable people with respect**, regardless of their gender, ethnic or social background, language, religious or other beliefs, disability, sexual orientation or other status and encourage them to treat others the same way. Always consider the age, maturity, understanding and emotional condition of participants when working with them.
- **Listen carefully to children and vulnerable people** about their needs, wishes, ideas and concerns and take them seriously.
- **Reward effort as well as performance.**
- **Only use physical contact with participants where absolutely necessary.** If contact is necessary, (e.g. for the purposes of coaching or first aid), then explain to the child what the contact is for, and change your approach if he or she appears uncomfortable and conduct this in an open and transparent way.
- **Establish clear codes of conduct for participants and apply disciplinary policies equally and fairly** in respect of poor behaviour. Physical punishment or discipline or use of aggressive physical force of any kind towards any participant in your care is prohibited.
- **Always use language or behaviour towards participants and others that is appropriate** and do not use language or behaviour that is or could be considered harassment, abuse, sexually provocative or demeaning. You are a role model to both participants and other members of the workforce, your appearance, attitude, behaviour and language has a direct effect on your role.
- **Not supervise or care for others whilst under the influence of alcohol or illegal drugs** or any medication that may impair your ability to ensure a players welfare.
- **Not appear to favour one child or show interest in one child more than another.**
- **Wherever possible, ensure that more than one member of the workforce is present** when working in the proximity of children or other vulnerable people. It is inappropriate to spend excessive time alone with those children you supervise or care for or to take them to your home.
- **Always maintain professional boundaries in person and online.** Do not engage in physical 'horseplay' with any participants and where possible avoid personal involvement in the activity you are responsible for. Be careful when engaging participants in 'banter' as this can easily be misunderstood. Recognise the danger to self and others when online.
- **Not engage in any form of sexual activity with or involving a child or vulnerable person in your care.** Such activity is prohibited regardless of the legal age of consent, and is considered a breach of this Policy.
- **Report any concerns you have over a person in your care or the actions of a member of the workforce.** If you witness or are told about any incident or issue that may put a vulnerable person at risk or harm, or may breach this policy, you have a duty to report it to the appropriate person (and only share the information with those who need to know) This may be your line manager or designated safeguarding officer.

It is everyone's responsibility to uphold this Code. Any breach of the Code is likely to lead to disciplinary action and in some cases a criminal prosecution.

SAFEGUARDING INCIDENT REPORT FORM

CONFIDENTIAL



Please return this form within 48 hours of the incident.		Date of completion:		
		Date received at City HQ:		
		Received by:		
Person Completing This Form: (this is the person reporting to the Safeguarding Team)				
Your Name:		Role/Position:		
Address (inc town, county & post code):				
Phone numbers (inc mobile):		e-mail address:		
Name and Contact Details of Person Making The Allegation (if different from above):				
Name		Role/Position:		
Address (inc town, county & post code):				
Phone numbers (inc mobile):		e-mail address:		
Name and Contact Details of Victim - Child or Vulnerable Adult: (please use another sheet if there is more than one victim)				
Name:		Club or Organisation:		
Address of Parent/Guardian/Carer:		Position at Organisation (participant /volunteer):		
Phone numbers (inc mobile):		e-mail address:		
Other useful information:		Ethnicity:	Disability(ies):	
Date of Birth:	Age: (at time of incident)	Gender:		

Name and Contact Details of ALLEGED PERPETRATOR (if known):		
Name		Club, Role or Organisation:
Address (inc town, county & post code):		Position in Organisation (eg coach):
Phone numbers (inc mobile):		How long have they held this position?
Age:	Gender:	e-mail address:
Relationship of accused to the victim/child/vulnerable adult:		
Is the accused a member of staff?		
Is the accused a member of paid or voluntary staff?		
Do they hold a current CRIMINAL RECORDS CHECK?		
Are they a qualified coach or referee?		
Does the accused hold an FA Coach Licence (UK only)?		
Does this person work in any other role with children or vulnerable adults (eg. performance teams, other clubs, teacher, scouts, care worker, other sports clubs)? If yes, please give details:		
The Allegation/Incident:		
Date of Incident:		Time of incident:
Where incident took place (e.g. club name):		Where incident took place (e.g. astroturf pitch):
Witness 1: Name and Contacts		Witness 2: Name and Contacts
Witness 3: Name and Contacts		Witness 4: Name and Contacts

Please continue with any further witnesses on a separate sheet; Witness Statement Form - appendix 1

How would you briefly describe or categorise the incident? (eg bullying, physical abuse, assault, intervention in a fight etc.)	
What happened? Please detail the incident as you saw it or how it was reported to you:	
If incident occurred during a match a referees report is required. Please supply contact details of the referee together with a copy of his/her report. Attached?	Y / N
Referees Name	Referees Contact details:
If Child/Vulnerable Adult spoke to you directly, please record actual details and words used by them. (Remember do not lead or question the child or young person):	

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?			
If yes, then please state when and how (below):			
FA or Premier League contacted?	Police Contacted?	Social Services?	Other (eg NSPCC)?
	Crime Number:		
By whom?	By whom?	By whom?	By whom?
FA / PL Details:	Police details:	Social Services details:	Contact details:
Please sign here (if paper copy) to confirm your statement as a true and accurate account:			Date completed:

Please return this form to **xxx [insert name and contact detail]**. If you require any assistance completing this form please also contact xxx

Your departmental designated Safeguarding officer may also be available; find them [insert website link]