

# SAFEGUARDING HANDBOOK

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POLICIES AND GUIDANCE  
FOR SAFER WORKING  
PRACTICE AT CHELSEA  
FC

Version 4: June 2022





# WELCOME

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

Through the application of this policy, we will develop a positive and proactive welfare programme to enable all children and young people to participate in an enjoyable and safe environment, a programme which applies equally to the safety and security of those working with and responsible for activities involving the young.

**Chelsea Football Club Ltd**



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# PRINCIPLES AND SCOPE





# 1. PRINCIPLES

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Chelsea FC plc (the Club) seeks to ensure the safety and well-being of all children and young people who engage in activities with the Club.

It is through the application of the policies and procedures contained within this safeguarding handbook that the Club seeks to develop a positive and proactive welfare programme to enable all children and young people to participate in an enjoyable and safe environment. This equally applies to the safety and security of those working with, and responsible for, the activities involving children and young people.

The policy and procedures contained within this handbook have been approved and endorsed by the Club's senior executives. This guidance is in accordance with the statutory guidance for safeguarding and prioritising the welfare of children and young people.

All staff who work with children or young people are automatically placed in a position of trust that carries authority, status, power and responsibility. If the adults involved are positive role models displaying high moral and ethical standards, the benefit to children and young people's development can be significant.



## 2. SCOPE

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This guidance is intended for use across the entire Club and is to be observed by all those working with children and young people. The application of the guidance contained within this handbook is mandatory and should be consulted in conjunction with all other Chelsea FC Policy and Procedures.

All the requirements are obligatory and are to be enforced as indicated by the appropriate persons in all cases where there are any suspected instances of poor practice or abuse.

All employees, workers, consultants, agency staff and volunteers must make themselves aware of the Club's Safeguarding Children Policy and Procedures. Where appropriate, their work with children and young people is supported by a safeguarding training programme to supplement this written policy.

The designated person with responsibility for safeguarding and child protection at the Club is Eva Bari, Head of Safeguarding, supported by Safeguarding Manager, Dani Taylor.

The Club has in place comprehensive safeguarding procedures which meet the requirements of:

- The FA Premier League Rules (in particular Section S, The Safeguarding of Vulnerable Groups and Safe Recruitment)
- The FA Safeguarding Children Rules
- Children Act 1989 & 2004
- Working Together to Safeguard Children 2013, 2015 & 2018

The Club also adheres to joint FA, Premier League and Football League's Affiliated Football's Safeguarding Policy 'Working Together to Safeguard Football'.

The Club has a responsibility to maintain a regular dialogue with the Local Safeguarding Children Board.

Chelsea FC fully acknowledges and accepts its responsibility for the safety and well-being of children and young people, who engage in any way in any activity carried out with the Club. Their welfare is of paramount importance. It is the duty of all adults working at the Club to safeguard the welfare of children and young people by creating an open and transparent environment that protects them from harm.





## 3. DEFINITIONS

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### Members of staff

This should be taken to include paid employees both part-time and full time. Members of staff used throughout this document also includes volunteers and contracted or temporary staff.

### Children and Young People

Throughout this document references are made to “children and young people”. These terms are interchangeable and refer to children who have not yet reached their 18th birthday. This guidance, however, also has value for those working with vulnerable adults.

### DSL

Designated Safeguarding Lead in an organisation.

### Adults

References to ‘adults’ or ‘volunteers’ refer to any adult who is employed, commissioned or contracted to work with or on behalf of children and young people, in either a paid or unpaid capacity.

### Manager

The term ‘manager’ refers to those adults who have responsibility for managing services including the supervision of employees and/or volunteers at any level.

### Employer

The term ‘employer’ refers to the organisation, which employs, or contracts to use the services of individuals in pursuit of the goals of that organisation. In the context of this document, the term ‘employer’ is also taken to include ‘employing’ the unpaid services of volunteers.

### Designated Officer

Formerly known as Local Authority Designated Officer (LADO).

### Safeguarding

Process of protecting children from abuse or neglect, preventing impairment of their health and development, and ensuring they are growing up in circumstances consistent with the provision of safe and effective care. This care must enable children to have optimum life chances and enter adulthood successfully.

### Duty of Care

The duty which rests upon an individual or organisation, to ensure that all reasonable steps are taken to ensure the safety of a child or young person involved in any activity or interaction for which that individual or organisation is responsible. Any person in charge of, or working with children and young people in any capacity is considered, both legally and morally, to owe them a duty of care.



# 4. AIMS & KEY PRINCIPLES

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## THE AIMS OF THE CLUB'S SAFEGUARDING HANDBOOK ARE...

- To demonstrate best practice in the area of safeguarding children and young people.
- To develop a positive and proactive welfare programme to enable all children and young people to participate in an enjoyable and safe environment.
- To promote high ethical standards throughout.

## THE KEY PRINCIPLES UNDERPINNING THIS HANDBOOK ARE...

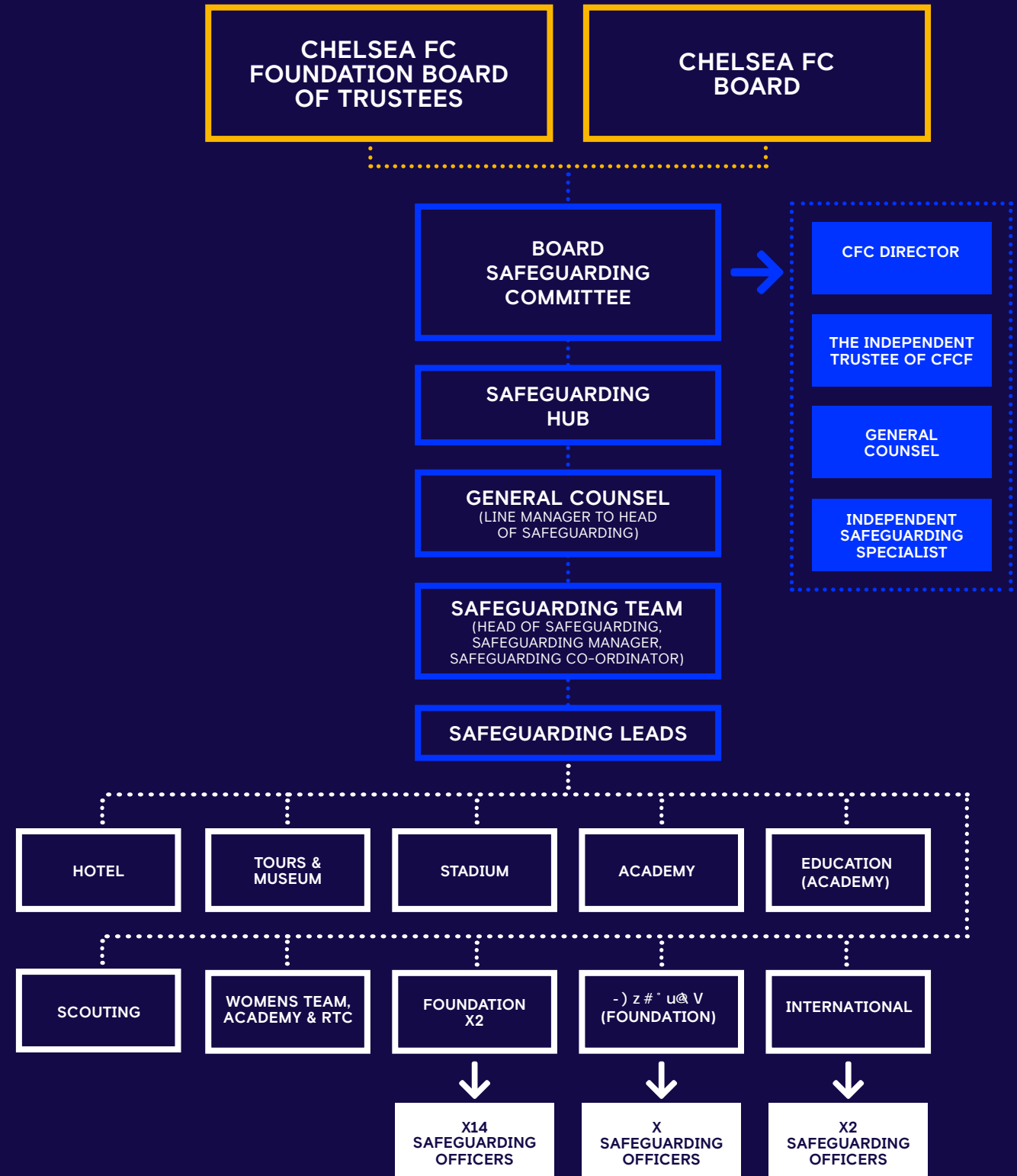
- The child or young person's welfare is, and must always be the paramount consideration.
- All children and young people have a right to be protected from abuse regardless of their gender, race, disability, sexual orientation, religion/beliefs or age.
- All suspicions and allegations of poor practice or abuse will be taken seriously and responded to efficiently and appropriately.
- To ensure that staff, coaches, parents and other adults who come into contact with children and young people are good role models.
- Working in partnership with other organisations, children and young people and their parents/carers is essential.





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### SAFEGUARDING STRUCTURE AT CHELSEA FC



## 5. BOARD SAFEGUARDING COMMITTEE (BSC)

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The Boards of Chelsea Football Club Limited (the “Club”) and the Chelsea FC Foundation (the “Foundation”) recognise their primary responsibility to safeguard children and adults at risk with whom the Club and Foundation have contact in the course of their activities.

Both Boards wish there to be a consistency of approach between Club and Foundation on matters of safeguarding with a sharing of best practice, and learning of lessons from any near misses or poor practice, between both.

All members of the BSC are Level 3 safeguarding trained. The BSC meet every four months on dates to be agreed by the members of the BSC. The Head of Safeguarding and the Safeguarding Manager attend each meeting.

### BSC– TERMS OF REFERENCE

In particular this includes:

- Take into account the practices and procedures of their respective Local Authorities under the procedures established by the LSCB (Local Safeguarding Children Board).
- Manage any allegations that are made against the Head of Safeguarding or any member of the BSC.
- To ensure there is an effective child protection policy and staff code of conduct in place.
- Ensure a curriculum is in place to teach participants about safeguarding and how to raise concerns.
- To ensure there are effective procedures in place to handle allegations against members of staff, contractors and volunteers, to ensure that all safeguarding concerns and allegations are properly reported to statutory and regulatory agencies. To make referrals to the DBS and to the FA and Premier League in respect of anyone removed from the role due to safeguarding concerns (or who would have been removed had they not resigned).
- To ensure that there are procedures in place to handle allegations of abuse against other children (i.e. where it is another child rather than an adult who is alleged to have abused).
- To ensure children's wishes are taken into account in the context of safeguarding by providing systems for them to express views and give feedback.
- To put in place appropriate safeguarding responses to children who go missing.
- Any decisions made by the BSC, the welfare of children and adults at risk is the paramount consideration.
- The quorum for any meeting of the Board Safeguarding Committee is three members. If necessary, the Chairman of the Club shall have the casting vote.
- All safeguarding and child protection matters shall be treated by the members of the BSC as highly confidential.



## 6. SAFEGUARDING HUB

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The Safeguarding Hub is a specialist team that oversees and is responsible for all safeguarding matters across the Club.

The Safeguarding Hub's primary objective is to ensure the safety and well-being of all children and young people who participate within the Club. This is achieved by proactively fostering a culture whereby children and young people are listened to and respected. Across all areas of Chelsea FC, the Safeguarding Hub work with staff members and volunteers to ensure the welfare of children and young people is paramount.

Staff are supported to learn about the safest and most child-focused ways to work with young people through upskilling and ongoing professional development. The Safeguarding Hub is committed to ensuring that any and all concerns regarding a child's welfare are responded to with integrity, sensitivity and in the best interests of children and young people.

The Safeguarding Hub is comprised of specialist safeguarding staff and work collaboratively within a multi-agency framework to achieve this.



## 7. ROLES

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### ROLE OF THE SAFEGUARDING LEAD

- Supporting the Head of Safeguarding and Safeguarding Manager to promote the welfare of children.
- Implementing the Club's reporting and recording procedures and be the first point of contact with the Safeguarding Hub.
- Report safeguarding concerns or poor practice to the Safeguarding Hub.
- To maintain a high profile as the recognised point of contact, freely available to all individuals wishing to raise concerns or seek help and guidance on any questions connected with the Club's Safeguarding Policy and Procedures.
- To attend Club safeguarding meetings within the Club safeguarding structure.
- Communication with outside agencies through the direction of the Head of Safeguarding & Safeguarding Manager.
- Attend meetings with linked external agencies including LADO etc. through the direction of the Head of Safeguarding.
- Promote the Club's safe working practice guidance, Code of Conduct and assist with risk assessments of activities.
- Assist the Head of Safeguarding in keeping staff's safeguarding training up-to-date, including the FA Safeguarding Children Certificates and first aid for coaches and PL requirements. Identify areas for development / training needs.
- Delivery of some staff training (where identified & required).
- To communicate clearly with all staff, volunteers, parents/carers and vulnerable groups associated with the Club on matters related to the safeguarding of children and vulnerable adults providing advice and support when necessary.
- Carry out monitoring visits to relevant sites/activities.

### ROLE OF THE SAFEGUARDING OFFICER

- To deputise for the Safeguarding Lead when appropriate.
- Maintaining, overview and upkeep of records relating to safeguarding concerns.
- Attendance at meetings for children, young people & vulnerable adults linked to safeguarding issues.
- Communication with outside agencies through the direction of the Designated Safeguarding Lead, Head of Safeguarding & Safeguarding Manager.
- Contact and attend meetings with linked external agencies including LADO etc. through the direction of the Designated Safeguarding Lead & Head of Safeguarding.
- Promotion of safe behaviours & safer practice within their department.
- Delivery of some staff training (where identified & required).
- To attend Club safeguarding meetings within the Club safeguarding structure.
- Advice and guidance for staff re safeguarding issues.





# COMMITMENT TO EQUALITY AND DIVERSITY

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# COMMITMENT TO EQUALITY AND DIVERSITY

Chelsea FC is committed to promoting equality, valuing diversity and working inclusively across the entire Club and the Foundation. Whilst managing safeguarding issues, we carefully consider a child or young person's identity and the way this may impact on their participation in activities inclusively across the entire Club.

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## WE TAKE INTO ACCOUNT CHARACTERISTICS INCLUDING THOSE COVERED BY THE EQUALITY ACT 2010, NAMELY:

- Age
- Disability
- Gender reassignment (transitioning from being male to female or being female to male)
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex (being male or female)
- Sexual Orientation (being lesbian, gay, bisexual or heterosexual)

This list is not exhaustive and other factors – such as a participant's socio-economic situation or not being in education, employment or training (NEETs) – should also be taken into consideration.

### It is important to remember that

- a participant does not have to possess a certain identity for discrimination to occur; for example, a participant may experience homophobia because they are friends or family who are not lesbian, gay or bisexual (LGB), or because they are perceived to be LGB or “different”
- the experience of participants may be affected by multiple identities (e.g. because of their sex and their race)



Chelsea FC Safeguarding Hub seek to encourage and support all partner agencies to similarly consider the identity of all children, young people and their families and promote anti-discriminatory practice. Where relevant, Chelsea FC works with the club's Equality Consultant to ensure that all young people feel safe, valued and included, whatever their perceived or actual identity.

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**RELEVANT LEGISLATION:**

The Children and Families Act (2014) Special educational needs code of practice

[www.legislation.gov.uk/ukpga/2014/6](http://www.legislation.gov.uk/ukpga/2014/6)

Children Act (1989)

[www.legislation.gov.uk/ukpga/1989/41/contents](http://www.legislation.gov.uk/ukpga/1989/41/contents)

Equality Act (2010)

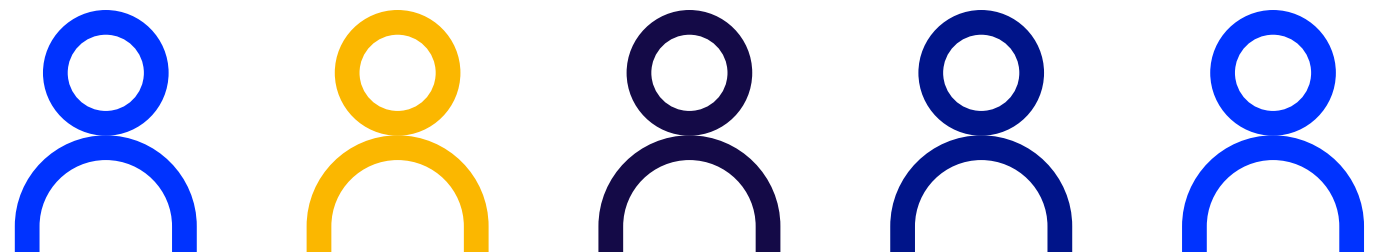
[www.legislation.gov.uk/ukpga/2010/15/contents](http://www.legislation.gov.uk/ukpga/2010/15/contents)

The United Nations Convention on the Rights of the Child (1992)

[www.unicef.org/crc](http://www.unicef.org/crc)

For further information on The Club's Equality and Diversity Policy and Procedures, refer to Chelsea FC Human Resources.

For further information on Equality and Diversity in relation to safeguarding children, young people and adults, contact the Safeguarding Hub.



# USE OF PHOTOGRAPHY AND FILM IMAGES



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- 18 Keeping children and young people safe >
- 18 Parent and carer consent >
- 19 Best practice guidelines >
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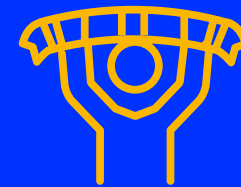


# USE OF PHOTOGRAPHY & FILM IMAGES

The Club takes its guidance on the use of images from guidelines issued by The FA and Premier League. All images of children and young people are taken by Club officials who have been briefed by a Chelsea FC Safeguarding Lead or Officer or by a member of the Communications and Marketing Department responsible for the activity being photographed or filmed. All images taken of children and young people are for the purpose of:

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## CELEBRATING IN FOOTBALL



## COMMUNICATION AND MEDIA



## COACHING AND PERFORMANCE AIDS





# 1. KEEPING CHILDREN AND YOUNG PEOPLE SAFE

In some instances, the use of photography and video imagery can present difficulties or risk to a child and their family.

Circumstances can vary however, this can include situations where:

- A child or young person has been removed from his/her family for their own safety.
- There are restrictions on contact with a parent or carer following a parental separation or legal orders in place.
- A child, young person or their family is a witness in criminal proceedings.

- Significant personal information accompanied by a photograph of a child can assist a third party in identifying the child leaving them vulnerable to being 'groomed'.

It is crucial to consider each child or young person's individual situation. Consult with the Safeguarding Hub when there are any concerns of this nature.

# 2. PARENT AND CARER CONSENT

Parents and carers are enabled to make informed decisions about the inclusion of their child in photograph and film. Obtain written consent from parents or carers before taking **any** imagery of children or young people.

Consent should be obtained at the start of the season and clearly state that consent is applicable throughout the upcoming season. Parents and carers must also be informed that they may withdraw consent to photograph their child at any point in time with immediate effect. Parents and carers are responsible for informing the Club of any change of circumstances within the season which may affect consent.

Where images of children and young people are to be taken at a one-off event, written consent must be obtained from parents and carers prior to the event taking place. Parents and carers must be informed of how the image or film will be used. The Club will not allow an image to be used for something other than that for which it was initially agreed.

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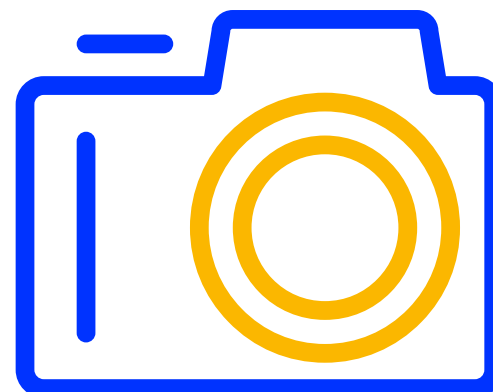
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All Chelsea FC staff members undertaking photography and videography are obligated to adhere to the below guidelines. These ensure that all photography is safe, fair and in the best interests of children and young people.

- All children or young people featured in Club publications will be appropriately dressed.
- Mobile phone cameras are not to be used in changing rooms.
- Where possible, the image will focus on the activity taking place and not a specific child.
- Where appropriate, images represent the broad range of people participating safely in the event.
- Children who are the subject of a court order will not have their images published in any Club document.
- No images of children featured in Club publications will be accompanied by personal details such as their home address or school.
- The Club does not put young player profiles with images and personal information on its website.

Designated Club photographers, where applicable, undertake a Disclosure and Barring Service check and attend a FA Safeguarding Children in Football workshop. All Club endorsed photographers are personally responsible for keeping up to date with the latest guidelines on the 'Use of Images' Policies from the Premier League and must wear Club identification at all times.



#### IMPORTANT POINTS TO NOTE:

- Chelsea FC reserve the right to permit or forbid photography and/or filming on all Chelsea FC owned or leased land and facilities.
- With respect to private land, the land owner or facility owner may decide whether or not photography and or videoing at football activities will be permitted.
- In both instances, this must be clearly stipulated before allowing individuals access to the property or land.
- If this is not complied with, Chelsea FC may request that person(s) leave the premises or land. However, it is not an offence to take appropriate photographs in a public place even if asked not to do so.



## 4. REPORT CONCERNS

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Every member of Chelsea FC has a responsibility to safeguard children and young people. Report any concerns about inappropriate use, adaptation or copying of images of children and young people to a Safeguarding Lead/Officer without delay. Alternatively, contact the Safeguarding Hub directly.

In all situations, if you have serious concerns about a possible child protection issue relating to the recording of imagery, call the Police. This action should be taken where you believe that someone may be acting unlawfully or putting a child or young person at significant and immediate risk.

Do not attempt to record, copy or otherwise distribute any indecent image or video of a child as evidence or proof. Seek advice from the Safeguarding Hub.



# CONFIDENTIALITY AND DATA PROTECTION



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safeguarding and  
information sharing



# CONFIDENTIALITY & DATA PROTECTION

For further information and guidance, please refer to Chelsea FC's Data Protection Policy available on the Chelsea FC Intranet.

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## CONFIDENTIALITY AND SAFEGUARDING

Employees, workers, consultants, agency staff and volunteers may have access to confidential information about children and young people and their family in order to undertake their responsibilities. They may be given or asked to share highly sensitive or private information and this must be handled and held with due care.

Confidential information about a child or young person and their family should never be used casually in conversation, or shared with any person other than on a need-to-know basis. In circumstances where the child or young person's identity does not need to be disclosed, the information should be used anonymously. In cases where sharing of information about a specific child is essential, consider how this information should be shared and to whom.

Staff members should never use confidential or personal information about a child or young person or his/her family for their own or others' advantage.



## INFORMATION SHARING

There are some circumstances in which an employee, worker, consultant, agency staff or volunteer may be expected to share information about a child or young person, for example when abuse is alleged or suspected. This is a fundamental aspect of multi-agency working. In such cases, individuals have a duty to pass information on without delay, but only to those with designated safeguarding responsibilities.

If an employee, worker, consultant, agency staff or volunteer is in any doubt about whether to share information or keep it confidential, they should seek guidance from the Head of Safeguarding or the Safeguarding Manager.

In all instances, members of staff are expected to:

- Treat information they receive about children and young people in a discreet and confidential manner.
- Store information securely.
- Seek advice from the Safeguarding Hub if they are in any doubt about sharing information they hold or which has been requested of them.
- Refer all media or legal enquiries to the relevant department.

The storing and processing of personal information about children, young people and their families is governed by the Data Protection Act, 1998. Data Protection Law is not intended to be a barrier to sharing information for the purposes of safeguarding. For further information on the Club's (and your) obligations under the Data Protection Act 1998, please see the Chelsea FC's Data Protection Policy, available on the Club Intranet.

# SAFER RECRUITMENT & DBS PANEL



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# SAFER RECRUITMENT & DBS PANEL

Chelsea FC and the Foundation is fully committed to ensuring the safety and well-being of all children, young people and adults at risk (vulnerable groups) that are in our care or attending our premises.

All members of Chelsea FC staff undergo a thorough recruitment process. For detailed information on Chelsea FC's Safer Recruitment policy and procedures, refer to Human Resources recruitment policies.

All staff who have regulated activity with children, young people and vulnerable adults are required to undergo a Disclosure and Barring Service (DBS) check and disclosure.

Chelsea FC have a robust process in place to risk assess any content disclosed on an individual's disclosure form. In all instances of disclosed content, a DBS Panel is convened and is chaired by the Head of Safeguarding. The panel also includes representation from HR, department line management and administration support.

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## OBJECTIVES OF THE DBS PANEL:

- To assess any and all content on an individual's DBS in view of their prospective role
- To provide consistent advice with regard to decision making and appointment decisions
- To record discussion, decision-making and future actions.

### DBS panel will undertake a comprehensive review and risk assessment of:

- The age of the offence (potential for rehabilitation weighed against the need to protect)
- The age of the applicant at time of offence
- The time lapse since the offence was committed
- The frequency of the offences (whether it was an isolated incident or a pattern of behaviour)
- The individual's explanation in regards to the content.

The panel subsequently deny or accept the member of staff based on analysis of the information provided. A joint decision is reached by all parties. Where there is disagreement, the final decision will be made by the Head of Safeguarding.

DBS panel may take advice or seek further information from statutory agencies.

## ACCOUNTABILITY AND GOVERNANCE

- The DBS Panel has been established with agreement of Chelsea FC Safeguarding Board. The Panel will report to the Board themes and issues, which emerge from the cases, discussed when they have implications for professional practice, policy, procedure and training.
- The DBS Panel is responsible for providing advice and guidance based upon current legislation, statutory guidance and best practice.

The panel will record the following information:

- Details of the individual
- Concerns raised
- Outcome of the discussion; and
- Further actions arising from the panel meeting.

The Club do not employ any individual with a conviction against a child, young person or vulnerable adult. We do not employ individuals who have sexual offences registered as content or any other serious criminal offences.

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# HOST FAMILY PROVISION



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## HOST FAMILY PROVISION

Young players enrolled with Chelsea FC Academy's full-time program are offered the opportunity to reside with a Chelsea FC Host Family. This provision is also available for female players who play in the Development Squad. The players stay with their Host Family for part of the week and return to their homes during the weekend.

Our Host Family provision offers players a stable, safe and comfortable environment off the pitch within close proximity to the training ground. The aim of such accommodation is to provide players with a restful space that will enable players to have maximal opportunity to fulfil their potential both on and off the pitch.



## SELECTING AND ASSESSING HOST FAMILIES

Selecting safe, suitable and nurturing Host Families is of the utmost importance to Chelsea FC. To achieve this, all Host Families undergo a thorough selection process.

### **This includes but is not limited to:**

- Completion of a detailed application form.
- Visit(s) to family home and initial meeting with Player Care and Safeguarding departments.
- Independent and robust assessment of family's capacity to host. Questions and assessment based on best practice guidance.
- Enhanced Disclosure Barring Service check (inclusive of barred lists) of all adults residing in family home.
- Local Authority Checks.
- Health and Safety assessment of home environment.
- Panel to determine suitability: including Safeguarding Hub, Player Care Team and independent assessor.
- Host parent induction and training.

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# CONTINUED SUPPORT FOR THE HOST FAMILY

Host Families adhere to a clear set of expectations that specify appropriate conduct and practice expected of all Chelsea FC Host Parents. This set of expectations explicitly details the responsibility of all host parents to adhere to Chelsea FC Safeguarding Children and Young People Policy and Procedures and inform Chelsea FC staff of any and all concerns they may have about a young person in their care.

In addition, Host families are offered continued development and training opportunities covering a range of issues including: nutrition, mental health and well-being and addiction. Placements are reviewed at a minimum of once per season.

## Support for the Young Player

Every young person living with a Host Family is visited on a regular basis by an appropriate allocated member of Chelsea FC staff. These visits are conducted to ensure the placement is the right fit for the young player to obtain their wishes and feelings. Young people are spoken to alone to allow for honest discussion about the Host Family environment.

Communication between The Club, a Host Family and a player's parents/carers is regular and occurs through a channel that is preferable to all parties. This includes meetings, phone calls, email and text communications. Any issues regarding arrangements are acted on swiftly and in collaboration with all parties to ensure the best outcome for the young person.

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# RATIOS AND SUPERVISION OF CHILDREN AND YOUNG PEOPLE



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# RATIOS AND SUPERVISION OF CHILDREN & YOUNG PEOPLE

The safety and well-being of all children, young people and staff members is of paramount importance. It is important to ensure that, in planning and running sports activities for children and young people, consideration is given to providing an appropriate staffing and supervision ratio of adults to participants.

## This enables staff to:

- Minimise risks to participants
- Enhance the benefits children draw from the activity.

Any activity undertaken by Chelsea FC or the Foundation will always give full consideration to the appropriate number of staff members available dependent on:

- Ages of children and young people (the lower the age of the participants, the greater the need for supervision)
- Additional supervision/support needs of some or all participants (for example due to disability or age)
- Competence/experience of participants for the specific activity
- Nature of activity
- Nature of the venue – whether closed stadium or training ground or an environment open to the public (e.g. Foundation, social inclusion projects)
- Types of equipment children and young people may have access to.

## IT IS RECOMMENDED THAT STAFF RATIOS ACROSS CHELSEA FC ARE 1:12-14 CHILDREN.

Ratios are dependent on the specific provision and circumstances. Please seek further information and advice from the Safeguarding Hub when considering appropriate staff ratios.

At all Chelsea FC events or training sessions, no matter how few participants, there must be a minimum of two members of staff or delivery partners. For example, this means that an event with 10 children must be staffed by two coaches or members of staff. This ensures that there is adequate cover in the event of an incident limiting the availability of one of the supervising adults during the activity.



# TRIPS AND TOURS



- 33 Trips and tours >
- 34 Best practice during the trip >





# TRIPS AND TOURS

Travelling to away games and trips away from home should be both safe and fun for children and young people. It is an opportunity to develop team working skills, grow in confidence and self-esteem.

Chelsea FC have a duty of care to all children, young people and staff members whilst away. This is achieved through a robust process that can include:

- A pre-visit to venue or location. This includes a comprehensive tour of football facilities, recreational, sleeping and dining areas and an agreed method of transport to and from locations by a competent supplier. Appropriate consideration is also given to the cultural, religious or language practices of the country and/or venue and the impact this may have on the clothing, itinerary and staffing requirements.
- Verification of the venue's health and safety policy completed.
- Risk assessment of tour or trip completed by an experienced member of staff (including fire safety, environmental risks and emergency planning i.e. location of closest hospital, medical equipment on site etc).
- Detailed plans are completed for all children and young people with health, medication or dietary requirements. This details what is required and who is responsible for the duration of the trip.
- Allergies and medical conditions documented, understood and communicated to Staff.
- Detailed itinerary completed including allocated leisure time, fixtures, meal times, and drop off and pick up arrangements.
- Meeting held with parents and carers to share procedures, expectations, codes of conduct and clothing and equipment requirements. A similar meeting is held with players.
- Allocation of appropriate medical staff to trip.
- Consideration and assessment of staffing requirements (taking into account supervision ratios, experience of staff members and gender balance of staff and participants, consideration of extra carers for children with additional needs or disability).
- Appointment of a specified point of contact who will remain at the Club throughout the trip. This member of staff has full details of the trip itinerary, staff and parent/carer contact details.
- For all trips, including overnight stays, parental and carer consent is sought.

33 Trips and tours >

34 Best practice during the trip >





### BEST PRACTICE DURING THE TRIP:

- Complete a check of players rooms to assess whether the room is as expected e.g. with no minibar, adequate number of beds and bathroom facilities. Balcony doors may need to be locked off if appropriate and if the facilities have a pool, players must be instructed not to use it without supervision from staff.
- Remind children and young people that they can speak to any member of staff if they have any problems or issues whilst away.
- Ensure that everyone is aware of fire exits and emergency procedures. Ensure it is clear whom the participants may go to in an emergency and where they are located at night time.
- Try to ensure that members of staff rooms are evenly distributed between the players' rooms.
- Ensure money and valuables are safely stored and advise participants on the correct way to do this.
- Hold daily group meetings and a staff meeting. These can be brief and provide the opportunity to discuss any issues or problems that may have arisen the previous night or day.
- Obtain a copy of the venue's safeguarding policy. Where there are inconsistencies with Chelsea FC policy, the Safeguarding Hub will review.

### LOCAL INFO

Use the **International SOS Assistance** app for local information, advice on visas, vaccinations and for emergency situations whilst on the trip.

For further information please speak to the Health and Safety Department.

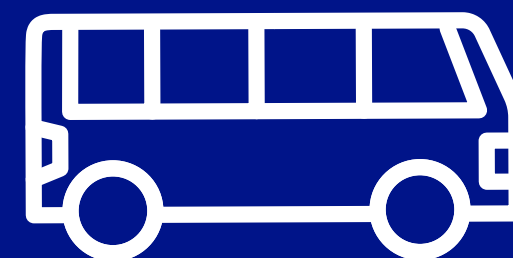


### RISK INFO

For more information on risk assessments, procedures and processes when planning tours or trips, contact the Foundation and Academy directly or contact Health and Safety Department for further guidance.

33 Trips and tours >

34 **Best practice during the trip** >



# MISSING CHILD PROCEDURE



36 Missing child procedure: Foundation >

37 Missing child procedure >





# MISSING CHILD PROCEDURE: FOUNDATION

There are rare circumstances in which children and young people may become missing at sports events organised by Chelsea FC. If a child goes missing during an event, The Club will apply the following procedure. This procedure is specific to Chelsea FC Foundation staff and follows the guidance laid down by the NSPCC Child Protection in Sport Unit.

## SCOPE

This procedure has been produced for Foundation colleagues and is specific to events held away from Chelsea FC controlled locations (e.g. anywhere except Stamford Bridge or Cobham Training Ground).

Schools, leisure centres and youth clubs may operate under their own policies and procedures during instances of missing participants. During initial and ongoing risk assessments, seek further information from the facility's designated safeguarding member of staff to ensure Chelsea FC's Policy is in alignment with the facility's processes.

Where there are significant discrepancies or disagreements, contact the Safeguarding Hub for further advice and information.

## OBJECTIVE

The objective of this procedure is to:

- Ensure other children and young people remain supervised
- Search for the missing child
- Escalate appropriately as soon as possible to ensure the child is found safely.

## CONSIDERATIONS

Children can go missing for a number of reasons. This list is not exhaustive:

- Not enjoying the event and deciding to leave of their accord
- Altercation or relationships breaking down during the event and deciding to leave
- Being distracted by other nearby activities
- Parent/carer taking a child from the session without informing staff
- Abduction.



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37 Missing child procedure >

# MISSING CHILD PROCEDURE

## THREE KEY THINGS TO REMEMBER:

**CONTROL:** Ensure other children remain supervised

**SEARCH:** Find the missing child as soon as possible

**ESCALATE:** Contact other people or agencies to assist

## CONTROL

1. Contact your line manager or Designated Safeguarding Lead/Officer immediately.
2. Stop the event if you think it would help to maintain supervision of the other children.
3. Ensure other children within the activity are supervised.

<b>NAME (NICKNAMES)</b>		<b>AGE</b>	
<b>HAIR COLOUR</b>		<b>SKIN COLOUR*</b>	
<b>CLOTHES (TOP)</b>		<b>CLOTHES (BOTTOM)</b>	
<b>DISABILITY**</b>			
<b>DISTINGUISHING FEATURES</b>			

\* Use language that will help people who are looking for the child e.g.: pale white, light brown, dark brown etc.

\*\* This can include physical disabilities and impairments as well as invisible, lifelong developmental disabilities (e.g. autism) which may affect the way a child or young person interacts and communicates with others.

## SEARCH

4. Ask if anybody knows the missing child's mobile phone number – attempt to call that number as soon as possible.
5. Carry out a search. Consider asking other available adults to help. [CFC colleagues](#), [volunteers](#), [support staff](#), [teachers](#), [facility staff](#).
6. Carry out a quick search of the immediate area and concentrate on likely areas – use your knowledge and experience of the event and consider the age range of the attendees and the location e.g. [changing rooms](#), [toilets](#), [carparks](#), [bus stops](#), [train stations](#), [building sites](#), [woods](#), [ditches](#), [playgrounds](#), [shops](#).

NB. Do not send other young people to search

**20 mins:** This is the maximum time that should pass before police are called. In many cases it is appropriate to call Police earlier. This is dependent on: the facility, children involved, time of day, case of individual child.

## IF THE CHILD CANNOT BE FOUND AFTER YOUR FIRST SEARCH:

## ESCALATE

7. Contact your line manager. Give an update and agree who will contact:

### POLICE

- Use 999
- Give the location (incl post code)
- Name of child
- Circumstances of the incident

### PARENT OR CARER

- Make them aware of the situation
- Tell them a full search is underway
- Tell them the police have been contacted

36 Missing child procedure: Foundation >

37 Missing child procedure >

## WHAT NEXT?

Keep searching until the police arrive or until the child has been found. Assist the police when they arrive.

# SAFE WORKING PRACTICE



39	Context	>
40	Risk of harm to children and young people	>
41	Duty of care	>
42	Confidentiality	>
43	Making a professional judgement	>
44	Power and positions of trust	>
45	Propriety and behaviour	>
46	Dress and appearance	>
46	Personal living space	>
47	Adults accommodated on site	>
48	Gifts, rewards and favouritism	>
49	Infatuations	>
50	Communications with children and young people (including use of technology)	>
52	Social contact	>
53	Sexual contact	>
54	Physical contact	>
56	Other activities that require physical contact	>
57	Behaviour management	>
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61	First aid and administration of medication	>
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63	Home visits	>
64	Transporting children and young people	>
65	Transporting children and young people	>
66	Curriculum	>
67	Trips and outings	>
68	Photography and video	>
69	Showers and changing	>
72	Access to inappropriate images and internet usage	>
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39	Context	>
40	Risk of harm to children and young people	>
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All adults who work with children and young people have a crucial role to play in shaping their lives. They have a unique opportunity to interact with children and young people in ways that are both affirming and inspiring. This guidance has been produced to help adults working in all settings to establish safe and responsive environments, which safeguard young people and reduce the risk of adults being unjustly accused of improper or unprofessional conduct at Chelsea FC.



#### THESE GUIDELINES:

- Apply to all adults working in all settings whatever their position, role, or responsibilities
- May provide guidance where an allegation has been made against an individual or where an individual's behaviour indicates that they may pose a risk of harm towards children and young people.

# 1. RISK OF HARM TO CHILDREN AND YOUNG PEOPLE

The guidance contained in this document is an attempt to identify what behaviours are expected of adults who work with children and young people.

Adults whose practice deviates from this guidance and/or their professional or employment-related code of conduct may bring into question their suitability to work with children and young people, within any of the club activities.

## THIS MEANS THAT ADULTS SHOULD:

- Have a clear understanding about the nature and content of this document
- Discuss any uncertainties or confusion with their line manager
- Understand what behaviours may harm or pose a risk of harm towards children and young people, or constitute a criminal offence.

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40	<b>Risk of harm to children and young people</b>	>
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## 2. DUTY OF CARE

39	Context	>
40	Risk of harm to children and young people	>
<b>41</b>	<b>Duty of care</b>	<b>&gt;</b>
42	Confidentiality	>
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All adults who work or volunteer with or on behalf of children and young people are accountable for the way in which they exercise authority; manage risk; use resources; and safeguard children and young people.

Whether working in a paid or voluntary capacity, these adults have a duty to keep children and young people safe and to protect them from sexual, physical and emotional harm and neglect. Children and young people have a right to be treated with respect and dignity. It follows that trusted adults are expected to take reasonable steps to ensure the safety and well-being of children and young people. Failure to do so may be regarded as neglect or breach of the duty of care.

The duty of care is in part, exercised through the development of respectful and caring relationships between adults and children and young people. It is also exercised through the behaviour of the adult, which at all times should demonstrate integrity, maturity and good judgement.

Everyone expects high standards of behaviour from adults who work with children and young people. When individuals accept such work, they need to understand and acknowledge the responsibilities and trust inherent in that role.

Chelsea FC also have a duty of care towards their employees, both paid and unpaid, under the Health and Safety at Work Act 1974. This requires us to provide a safe working environment for adults and provide guidance about safe working practices. Chelsea FC also has a duty of care for the well-being of employees and to ensure that employees are treated fairly and reasonably in all circumstances.

The Human Rights Act 1998 sets out important principles regarding protection of individuals from abuse by state organisations or people working for those institutions. Adults who are subject to an allegation should therefore be supported and the principles of natural justice applied.

The Health and Safety Act 1974 also imposes a duty on employees to take care of themselves and anyone else who may be affected by their actions or failings. An employer's duty of care and the adult's duty of care towards children should not conflict. This 'duty' can be demonstrated through the use and implementation of these guidelines.

### THIS MEANS THAT ADULTS SHOULD:

- Understand the responsibilities, which are part of their employment or role, and be aware that sanctions will be applied if these provisions are breached
- Always act, and be seen to act, in the child's best interests
- Avoid any conduct which would lead any reasonable person to question their motivation and intentions
- Take responsibility for their own actions and behaviour.

### THIS MEANS THAT CHELSEA FC WILL:

- Ensure that appropriate safeguarding and child protection policies and procedures are adopted, implemented and monitored
- Ensure that codes of conduct/ practices are continually monitored and reviewed
- Ensure that adults have a copy of both of the above
- Where another body provides services or activities, ensure that the body concerned has appropriate safeguarding training, policies and procedures
- Foster a culture of openness and support
- Ensure that systems are in place for concerns to be raised
- Ensure that adults are not placed in situations which render them particularly vulnerable
- Ensure all adults have access to and understand this guidance and related, policies and procedures
- Ensure that all job descriptions and person specifications clearly identify the competencies necessary to fulfil the duty of care
- Ensure support is offered to the staff whom an allegations has been made against.

<sup>1</sup> Health and Safety at Work Act 1974 Part 1, Section. 2 (1) and (2)

<sup>2</sup> Health and Safety at Work Act 1974 Part 1, Section.7



## 3. CONFIDENTIALITY

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40	Risk of harm to children and young people	>
41	Duty of care	>
42	<b>Confidentiality</b>	>
43	Making a professional judgement	>
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Adults may have access to confidential information about children and young people in order to undertake their responsibilities.

In some circumstances they may have access to or be given **highly sensitive or private information**. These details must be kept confidential at all times and only shared when it is in the interests of the child to do so. The welfare of a child is paramount so there may be circumstances when information has to be shared without the child's consent.

**Such information must not be used to:**

- Intimidate
- Humiliate
- Embarrass the child or young person concerned

If an adult who works with children is in any doubt about whether to share information or keep it confidential they should **seek guidance from a senior member of staff or their Designated Safeguarding Lead/Officer at the club**.

Any actions should be in line with our locally agreed information sharing protocols.

The storing and processing of personal information about children and young people is governed by the Data Protection Act 1998. However, the Data Protection Act is not, nor was it ever meant to be, a barrier to sharing information where there are child protection concerns. Chelsea FC provides clear advice to adults about their responsibilities under this legislation.

Whilst adults need to be aware of the need to listen and support children and young people, they must also understand the importance of not promising to keep secrets. Neither should they request this of a child young person under any circumstances.

Additionally, concerns and allegations about adults should be treated as confidential and passed to a senior manager without delay (**using Chelsea FC Managing Allegations Policy**).

### THIS MEANS THAT ADULTS SHOULD:

- Be clear about when information can be shared and in what circumstances it is appropriate to do so. The welfare of the child is paramount
- Treat information they receive about children and young people in a discreet and confidential manner
- Seek advice from a senior member of staff if they are in any doubt about sharing information they hold or which has been requested of them
- Know to whom any concerns or allegations should be reported
- Know who to report concerns/allegations against staff members or volunteers to
- Have access to and be aware of the Managing Allegations policy
- Have access to and understand the Confidential Reporting/Whistle Blowing Policy
- Refer to the Club's Data Protection Policy for further information. Available on Chelsea FC Intranet.



## 4. MAKING A PROFESSIONAL JUDGEMENT

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This guidance cannot provide a complete checklist of what is, or is not appropriate behaviour for adults in all circumstances.

There may be occasions and circumstances in which adults have to make decisions or take action in the best interests of the child or young person which could contravene this guidance or where no guidance exists (**however wherever possible seek guidance from your Designated Safeguarding Lead/Officer and/or the Head of Safeguarding**).

Individuals are expected to make judgements about their behaviour in order to secure the best interests and welfare of the children in their charge.

### Who to report to:

Designated Safeguarding Lead or Officer  
Head of Safeguarding / Safeguarding Manager  
A Senior Manager

In undertaking these actions individuals will be seen to be acting reasonably.

Adults should always consider whether their actions are warranted, proportionate and safe and applied equitably.



**THIS MEANS THAT WHERE NO SPECIFIC GUIDANCE EXISTS ADULTS SHOULD:**

- Discuss the circumstances that informed their action, or their proposed action, with a Designated Safeguarding Lead/Officer
- Report any actions which could be misinterpreted to their Safeguarding Lead/Officer
- Always discuss any incident, misunderstanding, accident or threats with a Designated Safeguarding Lead/Officer, also alerting a line manager where appropriate
- Always create a written record of discussions and reasons why actions were taken
- Record any areas of disagreement about a course of action taken and if necessary refer to a higher authority. The Safeguarding Hub can advise in these instances.

## 5. POWER AND POSITIONS OF TRUST



As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people are in positions of trust in relation to the young people in their care.

Broadly speaking, a relationship of trust exists when one party is in a position of power or influence over the other by virtue of their work or the nature of their activity. It is vital for all those in positions of trust to understand the power this can give them over those they care for and the responsibility they must exercise as a consequence of this relationship.

A relationship between an adult and a child or young person is not a relationship between equals. Where there is an unequal relationship/power imbalance, there is always potential for exploitation and harm. Adults have a responsibility to ensure that this unequal balance of power is not used against children and young people for personal advantage or gratification.

Adults should always maintain appropriate professional boundaries, avoiding behaviour which might be misinterpreted by children and young people, or by other adults. They should report and record any incident with this potential.

Where a person aged 18 or over is in a specified position of trust with a child under 18, it is an offence for that person to engage in sexual activity with or in the presence of that child, or to cause or incite that child to engage in or watch sexual activity.



### THIS MEANS THAT ADULTS SHOULD NOT:

- Use their position to gain access to information for their own or others' advantage
- Use their position to intimidate, bully, humiliate, threaten, coerce or undermine children or young people
- Use their position to form or promote relationships which are of a sexual nature, or which may become so
- Use their position to lead children or young people to believe that their relationship is anything other than a professional one, or likely to become anything other than a professional relationship in the future.

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## 6. PROPRIETY AND BEHAVIOUR

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All adults working with children and young people have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children and young people.

It is therefore expected that they will adopt high standards of personal conduct in order to maintain the confidence and respect of the public in general and all those with whom they work.

There may be times, for example, when an adult's behaviour or actions in their personal life come under scrutiny from local communities, the media or public authorities. This could be because their behaviour is considered to compromise their position in their workplace or indicate an unsuitability to work with children or young people. Misuse of drugs, alcohol or acts of violence would be examples of such behaviour.

Adults in contact with children and young people should therefore understand and be aware, that safe practice also involves using judgement and integrity about behaviours in places other than the work setting.

The behaviour of an adult's partner or other family members may raise concerns. Careful consideration must be given by an employer as to whether the behaviour of a husband/wife/partner/other family members renders the adult working with children and young people a risk.



### THIS MEANS THAT ADULTS SHOULD NOT:

- Behave in a manner, which would lead any reasonable person to think that they may pose a risk of harm towards children and young people
- Make, or encourage others to make, unprofessional personal comments which scapegoat, demean or humiliate, or which might be interpreted as such
- Post photographs or comments regarding the above on any internet or social media site.



### THIS MEANS THAT ADULTS SHOULD:

- Always be a positive role model
- Be aware that behaviour in their personal lives may impact upon their work with children and young people
- Follow any codes of conduct deemed appropriate by their organisation
- Understand that the behaviour and actions of their partner (or other family members) may raise questions about their suitability to work with children and young people.

## 7. DRESS AND APPEARANCE

A person's dress and appearance are matters of personal choice and self-expression. However adults should dress in ways which are appropriate to their role and this may need to be different to how they dress when not at work.

Adults who work with children and young people should ensure they take care to ensure they are dressed appropriately for the tasks and the work they undertake.

Those who dress in a manner which could be considered as inappropriate could render themselves vulnerable to criticism or allegations.



**THIS MEANS THAT ADULTS SHOULD WEAR CLOTHING WHICH:**

- Is appropriate to their role
- Is not likely to be viewed as offensive, revealing, or sexually provocative
- Does not distract, cause embarrassment or give rise to misunderstanding
- Is absent of any political or otherwise contentious slogans
- Is culturally sensitive and not considered to be discriminatory.

## 8. PERSONAL LIVING SPACE

No child or young person should be in, or invited into, the home of an adult who works with them, unless the adult's home is the place of work designated by Chelsea FC as a work place e.g. Academy Host Parents.

It is not appropriate for Chelsea FC to expect or request that a private living space be used for work with children and young people.

Under no circumstances should children or young people assist with chores or tasks in the home of an adult who works with them (unless negotiated within host parent provision). Neither should they be asked to do so by friends or family of that adult.



**THIS MEANS THAT ADULTS SHOULD:**

- Be vigilant in maintaining their privacy and mindful of the need to avoid placing themselves in vulnerable situations including sharing addresses, showing images of their home, family or belongings with young people in a work context
- Challenge any request for their accommodation to be used as an additional resource for the organisation
- Be mindful of the need to maintain professional boundaries
- Refrain from asking children and young people to undertake personal jobs or errands.



- 39 Context >
- 40 Risk of harm to children and young people >
- 41 Duty of care >
- 42 Confidentiality >
- 43 Making a professional judgement >
- 44 Power and positions of trust >
- 45 Propriety and behaviour >
- 46 Dress and appearance >
- 46 Personal living space >
- 47 Adults accommodated on site >
- 48 Gifts, rewards and favouritism >
- 49 Infatuations >
- 50 Communications with children and young people (including use of technology) >
- 52 Social contact >
- 53 Sexual contact >
- 54 Physical contact >
- 56 Other activities that require physical contact >
- 57 Behaviour management >
- 58 Use of control and physical intervention >
- 60 Children and young people in distress >
- 61 First aid and administration of medication >
- 62 One to one situations >
- 63 Home visits >
- 64 Transporting children and young people >
- 65 Transporting children and young people >
- 66 Curriculum >
- 67 Trips and outings >
- 68 Photography and video >
- 69 Showers and changing >
- 72 Access to inappropriate images and internet usage >
- 73 Sharing concerns and recording incidents >



39	Context	>
40	Risk of harm to children and young people	>
41	Duty of care	>
42	Confidentiality	>
43	Making a professional judgement	>
44	Power and positions of trust	>
45	Propriety and behaviour	>
46	Dress and appearance	>
46	Personal living space	>
<b>47</b>	<b>Adults accommodated on site</b>	<b>&gt;</b>
48	Gifts, rewards and favouritism	>
49	Infatuations	>
50	Communications with children and young people (including use of technology)	>
52	Social contact	>
53	Sexual contact	>
54	Physical contact	>
56	Other activities that require physical contact	>
57	Behaviour management	>
58	Use of control and physical intervention	>
60	Children and young people in distress	>
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63	Home visits	>
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68	Photography and video	>
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73	Sharing concerns and recording incidents	>

## 9. ADULTS ACCOMMODATED ON SITE

There may be occasions when adults live on site, for example ground staff living in a house on the Academy grounds.

Adults should never invite children or young people into their home. Nor would it be appropriate for the club through its activities to ever expect or request that private living space be used to undertake work with children or young people for example tutorials, pastoral care or counselling.

If these activities are required, Chelsea FC will ensure that appropriate accommodation within the site allocated to children and young people, is identified.

Under no circumstances should children or young people be asked to assist adults who live on site, with chores, personal errands, jobs or tasks in their private accommodation. Neither should they be asked to do so by friends or family of that adult, living in or visiting the accommodation.

### THIS MEANS THAT ADULTS SHOULD:

- Be vigilant in maintaining their privacy when living in on-site accommodation
- Be mindful of the need to avoid placing themselves in vulnerable situations
- Challenge any request for their personal accommodation to be used as an additional resource for the organisation
- Not ask young people to undertake personal jobs or errands
- Ensure any work experience complies with recommendations. These can be obtained from Chelsea FC Health and Safety department. Please also inform Human Resources
- Be mindful of the need to maintain professional boundaries
- Always ensure that an appropriate Health risk assessment is undertaken prior to undertaking certain activities.



# 10. GIFTS, REWARDS AND FAVOURITISM



The giving of gifts or rewards to children or young people should be part of an agreed policy for supporting positive behaviour or recognising particular achievements.

In some situations, the giving of gifts as rewards may be an accepted practice for a group of children, whilst in other situations the giving of a gift to an individual child or young person will be part of an agreed plan, recorded and discussed with senior manager and the parent or carer.

It is acknowledged that there are specific occasions when adults may wish to give a child or young person a personal gift. This is only acceptable practice where, in line with the agreed policy, the adult has first discussed the giving of the gift and the reason for it, with the senior manager and/or parent or carer and the action is recorded. Any gifts should be given openly and not be based on favouritism. Adults need to be aware however, that the giving of gifts can be misinterpreted by others as a gesture either to bribe a child or young person, or to groom\* them.

Adults should exercise care when selecting children and young people for specific activities or privileges to avoid perceptions of favouritism or unfairness. Methods and criteria for selection should always be transparent and subject to scrutiny. Adults should be aware that consistently conferring inappropriate special attention or favour upon a child might be construed as being part of a grooming process and as such will give rise to concerns about their behaviour.

There may be occasions when children, young people or parents wish to pass small tokens of appreciation to adults; for example as a 'thank you' and this is acceptable. It is unacceptable however, to receive gifts on a regular basis or of any significant value. Care should also be taken to ensure that adults do not accept any gift that might be construed by others as a bribe, or lead the giver to expect preferential treatment.

**Refer to Chelsea FC's Anti-Bribery and Corruption Policy for further information and guidance, available on Chelsea FC Intranet.**

## THIS MEANS THAT ADULTS SHOULD:

- Be aware of their organisation's policy on the giving and receiving of gifts
- Ensure that gifts received or given in situations which may be misconstrued are declared
- Generally, only give gifts to an individual young person as part of an agreed reward system
- Where giving gifts other than as above, ensure that these are of insignificant value
- Ensure that all selection processes which concern children and young people are fair and that wherever practicable these are undertaken and agreed by more than one member of staff
- Ensure that they do not consistently favour one child over others so as to avoid raising questions about the adults' motivation or intention.

39	Context	>
40	Risk of harm to children and young people	>
41	Duty of care	>
42	Confidentiality	>
43	Making a professional judgement	>
44	Power and positions of trust	>
45	Propriety and behaviour	>
46	Dress and appearance	>
46	Personal living space	>
47	Adults accommodated on site	>
48	<b>Gifts, rewards and favouritism</b>	>
49	Infatuations	>
50	Communications with children and young people (including use of technology)	>
52	Social contact	>
53	Sexual contact	>
54	Physical contact	>
56	Other activities that require physical contact	>
57	Behaviour management	>
58	Use of control and physical intervention	>
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64	Transporting children and young people	>
65	Transporting children and young people	>
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67	Trips and outings	>
68	Photography and video	>
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73	Sharing concerns and recording incidents	>

\* 'grooming' – the act of gaining the trust of a child so that sexual abuse can take place.

# 11. INFATUATIONS

Occasionally, a child or young person may develop an infatuation with an adult who works with them.

These adults should deal with these situations sensitively and appropriately to maintain the dignity and safety of all concerned. They should remain aware, however, that such infatuations carry a high risk of words or actions being misinterpreted and should therefore make every effort to ensure that their own behaviour is above reproach.

An adult, who becomes aware that a child or young person is developing an infatuation, should discuss this at the earliest opportunity with a senior manager or parent/carer so appropriate action can be taken to avoid any hurt, distress or embarrassment and safeguard all those concerned.



## THIS MEANS THAT ADULTS SHOULD:

- Report and record any incidents or indications (verbal, written or physical) that suggest a child or young person may have developed an infatuation with an adult in the workplace
- Always acknowledge and maintain professional boundaries
- Always ensure that children and young people are clear about your professional boundaries with regards to:
  - Appropriate communication between adults and young people
  - Expected boundaries around physical contact
  - Expectations around social media.

39	Context	>
40	Risk of harm to children and young people	>
41	Duty of care	>
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43	Making a professional judgement	>
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46	Dress and appearance	>
46	Personal living space	>
47	Adults accommodated on site	>
48	Gifts, rewards and favouritism	>
<b>49</b>	<b>Infatuations</b>	<b>&gt;</b>
50	Communications with children and young people (including use of technology)	>
52	Social contact	>
53	Sexual contact	>
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65	Transporting children and young people	>
66	Curriculum	>
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## 12. COMMUNICATION WITH CHILDREN AND YOUNG PEOPLE

39	Context	>
40	Risk of harm to children and young people	>
41	Duty of care	>
42	Confidentiality	>
43	Making a professional judgement	>
44	Power and positions of trust	>
45	Propriety and behaviour	>
46	Dress and appearance	>
46	Personal living space	>
47	Adults accommodated on site	>
48	Gifts, rewards and favouritism	>
49	Infatuations	>
50	<b>Communications with children and young people (including use of technology)</b>	>
52	Social contact	>
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### INCLUDING USE OF TECHNOLOGY: SEE CHELSEA FC MOBILE PHONE & SOCIAL MEDIA POLICY

Communication between children and adults, by whatever method, should take place within clear and explicit professional boundaries.

- Adults should not share any personal information with a child or young person. For example, personal phone numbers or exact address. They should not request, or respond to, any personal information from the child or young person, other than that which might be appropriate as part of their professional role.
- Adults must ensure that all communications are transparent and open to scrutiny. This includes the wider use of technology such as mobile phones, text messaging, email, digital cameras, videos, web-cams, websites, blogs etc.
- In the event that a child or young person tries to initiate contact with the adult via a personal social networking site for example, the adult is responsible for ensuring that they **do not respond and the incident should be recorded and passed to a manager.**
- There can be some instances whereby staff members at Chelsea FC may need to engage with young people online. Adults using the above methods to make contact with a child/young person, should obtain their line manager's agreement and record this on file. A log of any subsequent communication should be kept on file.
- Consent to contact a young person must be obtained from the parent if the child is under 16. It is also recommended that for young people over 16, their parents are also informed of the intention to communicate with their child.
- Adults should also be circumspect in their communications with children so as to avoid any possible misinterpretation of their motives or any behaviour, which could be construed as grooming.
- They should not give their personal contact details to children and young people including email, home or mobile telephone numbers. Email or text communications between an adult and a child young person outside agreed protocols may lead to disciplinary and/or criminal investigations. This also includes communications through internet based web sites.
- In relation to social networking sites, adults should not maintain 'e-relationships' with children and young people they work with or have previously worked with. Examples of sites include, Instagram, Facebook or Twitter. Adults are strongly advised, in their own interests, to take steps to ensure that their personal data is not accessible to anybody who does not have permission to access it.
- Internal email systems should only be used in accordance with the Chelsea FC Social Media & Mobile Phone Policy.



39	Context	>
40	Risk of harm to children and young people	>
41	Duty of care	>
42	Confidentiality	>
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There may be instances in which group communication and/or group messaging participants is appropriate. The suitability of the method of communication used with young people must be considered on a case by case basis and is dependent on the area of the business, the age of the child and the reason for communication.

Parental consent must be sought if staff members plan to be in direct communication with young people under the age of 16 years.

Best practice when using group messages or group emails:

- It is essential that there are two members of Chelsea FC (or appropriate partner agency e.g. school liaison) staff present in the messaging group or email chain.
- Use a Chelsea FC device in all instances.
- Avoid any one to one communication with young people via private messages.
- As a staff member, if you receive a private message from a participant, where appropriate, instruct the participant that all communication will be on the group chat or email chain. Where a young person wishes to have a private conversation, inform your manager of your communications with the young person.
- Avoid sharing personal details about individual participants in the group. Consider emailing the young person and their parents directly.
- Inform your line manager of any inappropriate messages or images shared by participants in any group messenger or email conversation – transparency is vital.
- Remain transparent with all communication – be prepared to show all communication if asked.

### THIS MEANS THAT ADULTS SHOULD:

- Ensure that personal social networking sites have high privacy settings
- Ensure that they do not accept children and young people they work with, as friends on their personal social networking sites unless agreed with line management
- Never use or access social networking sites of children or young people with whom they work
- Not give their personal contact details to children or young people, including their personal mobile telephone number
- Only use equipment provided by the organisation e.g. A mobile phone; to communicate with children and young people, as part of the organisation's policy; and ensuring that parents have given permission for this
- Only make contact with children for professional reasons and in accordance with the organisation's policy
- Recognise that text messaging is rarely an appropriate response to a child in a crisis situation or at risk of harm. It should only be used as a last resort when other forms of communication are not possible
- Not use internet or web-based communication channels to send personal messages to children or young people.



# 13. SOCIAL CONTACT

39	Context	>
40	Risk of harm to children and young people	>
41	Duty of care	>
42	Confidentiality	>
43	Making a professional judgement	>
44	Power and positions of trust	>
45	Propriety and behaviour	>
46	Dress and appearance	>
46	Personal living space	>
47	Adults accommodated on site	>
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Adults who work with children and young people should not seek to have social contact with them or their families, unless the reason for this contact has been firmly established and agreed with senior managers.

If a child or parent seeks to establish social contact, or if this occurs coincidentally, the adult should exercise her/his professional judgement in forming a response but should always discuss the situation with their manager or with the parent of the child or young person. Adults should be aware that social contact in certain situations could be misconstrued as grooming.

Where social contact is an integral part of work duties, e.g. player care work in the community, care should be taken to maintain appropriate personal and professional boundaries. This also applies to social contacts made through interests outside of work or through the adult's own family or personal networks.

It is recognised that some adults may support a parent who may be in particular difficulty. Care needs to be exercised in those situations where the parent comes to depend upon the adult for support outside their professional role. This could include practical support or emotional support. This situation should be discussed with senior management and the Safeguarding Hub and where necessary referrals made to the appropriate support agency.

## THIS MEANS THAT ADULTS SHOULD:

- Have no secret social contact with children and young people or their parents
- Consider the appropriateness of the social contact according to their role and nature of their work
- Always approve any planned social contact with children or parents with senior colleagues
- Advise senior management of any social contact they have with a child or a parent with whom they work, which may give rise to concern or could be misconstrued
- Report and record any situation, which may place a child at risk or which may compromise the organisation or their own professional standing
- Understand some communications may be called into question and need to be justified.

## 14. SEXUAL CONTACT

39	Context	>
40	Risk of harm to children and young people	>
41	Duty of care	>
42	Confidentiality	>
43	Making a professional judgement	>
44	Power and positions of trust	>
45	Propriety and behaviour	>
46	Dress and appearance	>
46	Personal living space	>
47	Adults accommodated on site	>
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49	Infatuations	>
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All adults should clearly understand the need to maintain appropriate boundaries in their contacts with children and young people. Intimate or sexual relationships between children/young people and the adults who work with them will be regarded as a grave breach of trust.

Allowing or encouraging a relationship to develop in a way which might lead to a sexual relationship, is also unacceptable.

Any sexual activity between an adult and the child or young person with whom they work may be regarded as a criminal offence and will always be reported to the police for investigation. Engaging in such activity will also prompt the instigation of disciplinary procedures. Either of the above may lead to the adult being dismissed and referred to the Disclosure and Barring Service (DBS).

Children and young people are protected by specific legal provisions regardless of whether the child or young person 'consents' or not. The sexual activity referred to does not just involve physical contact including penetrative and non-penetrative acts. It may also include non-contact activities, such as causing children to engage in or watch sexual activity or the production of pornographic material. Working Together to Safeguard Children (2018) defines sexual abuse as "forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening".

There are occasions when adults embark on a course of behaviour known as 'grooming' where the sole purpose is to gain the trust of a child, and manipulate that relationship so that sexual abuse can take place. Adults should be aware that consistently conferring inappropriate special attention and favour upon a child might be construed as being part of a 'grooming' process and as such will give rise to concerns about their behaviour.



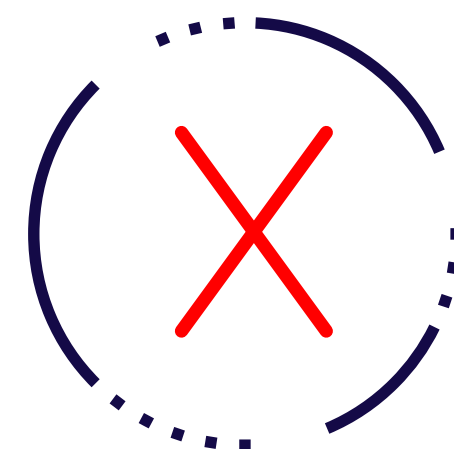
### THIS MEANS THAT ADULTS SHOULD NOT:

- Have sexual relationships with children and young people
- Have any form of communication with a child or young person which could be interpreted as sexually suggestive or provocative i.e. verbal comments, letters, notes, email, phone calls, texts, physical contact
- Make sexual remarks to, or about, a child/young person
- Discuss their own sexual relationships with or in the presence of children or young people.



### THIS MEANS THAT ADULTS SHOULD:

- Ensure that their relationships with children and young people clearly take place within the boundaries of a respectful professional relationship
- Take care that their language or conduct does not give rise to comment or speculation. Attitudes, demeanour and language all require care, sensitivity and thought.





# 15. PHYSICAL CONTACT

39	Context	>
40	Risk of harm to children and young people	>
41	Duty of care	>
42	Confidentiality	>
43	Making a professional judgement	>
44	Power and positions of trust	>
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Some roles within the Club require physical contact with children. There are also occasions when it is entirely appropriate for other adults to have some physical contact with the child or young person with whom they are working. However, it is crucial that in all circumstances, adults should only touch children in ways which are appropriate to their professional or agreed role and responsibilities.

Not all children and young people feel comfortable about physical contact, and adults should not make the assumption that it is acceptable practice to use touch as a means of communication.

Permission should be sought from a child or young person before physical contact is made.

Where the child is very young, there should be a discussion with the parent or carer about what physical contact is acceptable and/or necessary.

## USE YOUR PROFESSIONAL JUDGEMENT



Adults should use their professional judgement at all times. Observe, and take note of the child's reaction or feelings and – so far as is possible – use a level of contact and/or form of communication which is acceptable to the child for the minimum time necessary.

## LIMITED TOUCH



The general culture of 'limited touch' should be adapted, where appropriate, to the individual requirements of each child. Children and young people with special needs may require more physical contact to assist their everyday learning. The arrangements should be understood and agreed by all concerned, justified in terms of the child's/young person's needs, consistently applied and open to scrutiny.

When physical contact is made with a child this should be in response to their needs at the time, of limited duration and appropriate to their age, stage of development, gender, ethnicity and background. It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one child in one set of circumstances may be inappropriate in another, or with a different child.

## Frequent contact

Even if well intentioned, physical contact which occurs regularly with an individual child or young person, is likely to raise questions unless there is explicit agreement on the need for, and nature of, that contact. This would then be part of a formally agreed plan or within the parameters of established, agreed and legal professional protocols on physical contact e.g. sport activities or medical procedures. Any such arrangements should be understood and agreed by all concerned, justified in terms of the child's needs, consistently applied and open to scrutiny.

Physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority. If an adult believes that their action could be misinterpreted, or if an action is observed by another as being inappropriate or possibly abusive, the incident and circumstances should be reported to the Safeguarding lead and Safeguarding Hub outlined in the procedures for handling allegations and an appropriate record made. Parents/carers should also be informed in such circumstances.

39	Context	>
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Where a child seeks or initiates inappropriate physical contact with an adult, the situation should be handled sensitively and care taken to ensure that contact is not exploited in any way. Careful consideration must be given to the needs of the child and advice and support given to the adult concerned.

It is recognised that some children who have experienced abuse may seek inappropriate physical contact. Adults should be particularly aware of this when it is known that a child has suffered previous abuse or neglect. In the child's view, physical contact might be associated with such experiences and lead to some actions being misinterpreted. In all circumstances where a child or young person initiates inappropriate physical contact, it is the responsibility of the adult to sensitively deter the child and help them understand the importance of personal boundaries. Such circumstances must always be reported and discussed with a senior manager and the parent/carer.



#### AT CHELSEA FC WE:

- Provide staff, on a "need to know" basis, with relevant information about vulnerable children/young people in their care
- Have a system in place for recording incidents and the means by which information about incidents and outcomes can be easily accessed by senior management
- Make adults aware of relevant national, professional or organisational guidance in respect of physical contact with children and meeting medical needs of children and young people where appropriate
- Are explicit about what physical contact is appropriate for adults working in their setting.

#### When may physical contact be appropriate in sport?

In accordance with Child Protection in Sport Unit:

- Develop sports skills or techniques
- Treat an injury
- Prevent an injury or accident from occurring
- Meet the requirements of the sport
- Comfort a distressed child or to celebrate their success.



#### THIS MEANS THAT ADULTS SHOULD:

- Be aware that even well intentioned physical contact may be misconstrued by the child, an observer or by anyone to whom this action is described
- Be aware that physical contact should take place in the interests of and for the benefit of the child, rather than the adult involved
- Understand that aside from pre-agreed medical procedures or demonstrations, as a general rule touching a child in their middle area and/or the tops of their legs is unnecessary and to be avoided
- Always be prepared to report and explain actions and accept that all physical contact be open to scrutiny
- Not indulge in horseplay/play fighting
- Work within health and safety regulations
- Be aware that there may be occasions when a young person may look to celebrate success or achievement with a hug, high-five or similar gesture. Staff should use their professional judgement to ensure that this contact is age appropriate and not unnecessarily prolonged or gratuitous
- Be aware of cultural or religious views about touching and always be sensitive to issues of gender
- Understand that physical contact in some circumstances can be easily misinterpreted
- Recognise the additional vulnerabilities of children that may have been abused or neglected and how their experience may affect their behaviour.

## 16. OTHER ACTIVITIES THAT REQUIRE PHYSICAL CONTACT



SPORT

DRAMA

OUTDOOR

Adults who work in certain settings, for example sports, drama or outdoor activities may have to initiate some physical contact with children, for example to demonstrate technique in the use of a particular piece of equipment, adjust posture, or perhaps to support a child so they can perform an activity safely or prevent injury. Such activities should be carried out in accordance with existing codes of conduct, regulations and best practice.

Physical contact should take place only when it is necessary in relation to a particular activity. It should take place in a safe and open environment i.e. one easily observed by others and last for the minimum time necessary. The extent of the contact should be made clear to the parent/carer and once agreed, should be undertaken with the permission of the child/young person. Contact should be relevant to their age or understanding and adults should remain sensitive to any discomfort expressed verbally or non-verbally by the child.

Guidance and protocols around safe and appropriate physical contact are provided by national organisations, for example sports governing bodies and should be understood and applied consistently. As a club we will follow such guidance from the FA & Premier League. Any incidents of physical contact that cause concern or fall outside of these protocols and guidance should be reported to the Designated Safeguarding Lead and then to Head of Safeguarding.

It is good practice if all parties clearly understand at the outset, what physical contact is necessary and appropriate in undertaking specific activities. Keeping parents/carers, children and young people informed of the extent and nature of any physical contact may also prevent allegations of misconduct or abuse arising.



**AT CHELSEA FC WE:**

- Have up to date guidance and protocols on appropriate physical contact in place that promote safe practice and include clear expectations of behaviour and conduct
- Ensure that staff are made aware of this guidance and that safe practice is continually promoted through supervision and training.



**THIS MEANS STAFF SHOULD:**

- Treat children with dignity and respect
- Avoid contact with intimate parts of the body
- Always explain to a child the reason why contact is necessary and what form that contact will take. If a child does not consent to contact all staff must honour this
- Seek consent of parents where a child or young person is unable to do so because of a disability
- Consider alternatives, where it is anticipated that a child might misinterpret any such contact
- Avoid all horseplay including tickling or play fighting when working with young people
- Be familiar with and follow recommended guidance and protocols from the FA and PL
- Conduct activities where they can be seen by others
- Be aware of gender, cultural or religious issues that may need to be considered prior to initiating physical contact.

39	Context	>
40	Risk of harm to children and young people	>
41	Duty of care	>
42	Confidentiality	>
43	Making a professional judgement	>
44	Power and positions of trust	>
45	Propriety and behaviour	>
46	Dress and appearance	>
46	Personal living space	>
47	Adults accommodated on site	>
48	Gifts, rewards and favouritism	>
49	Infatuations	>
50	Communications with children and young people (including use of technology)	>
52	Social contact	>
53	Sexual contact	>
54	Physical contact	>
56	<b>Other activities that require physical contact</b>	>
57	Behaviour management	>
58	Use of control and physical intervention	>
60	Children and young people in distress	>
61	First aid and administration of medication	>
62	One to one situations	>
63	Home visits	>
64	Transporting children and young people	>
65	Transporting children and young people	>
66	Curriculum	>
67	Trips and outings	>
68	Photography and video	>
69	Showers and changing	>
72	Access to inappropriate images and internet usage	>
73	Sharing concerns and recording incidents	>



# 17. BEHAVIOUR MANAGEMENT

39	Context	>
40	Risk of harm to children and young people	>
41	Duty of care	>
42	Confidentiality	>
43	Making a professional judgement	>
44	Power and positions of trust	>
45	Propriety and behaviour	>
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All children and young people have a right to be treated with respect and dignity even in those circumstances where they display difficult or challenging behaviour.

Adults should not use any form of degrading treatment to punish a child. The use of sarcasm, demeaning or insensitive comments towards children and young people is not acceptable in any situation. Any sanctions or rewards used should be part of a behaviour management policy, which is widely publicised and regularly reviewed.

It is not acceptable for an adult who works with children to use corporal punishment as a form of behaviour management.

Where children display difficult or challenging behaviour, adults must follow behaviour guidance outlined by Chelsea FC and use strategies appropriate to the circumstance and situation.

The use of reasonable physical intervention can only be justified in exceptional circumstances.

These strategies should be carefully defined in all areas of the Club, so that their use does not constitute a criminal offence. For example, putting a child or young person in a room and holding the door closed may be deemed a restriction of liberty and subsequently constitute a criminal offence.

Where a child has specific needs in respect of particularly challenging behaviour, a positive handling plan may be drawn up and agreed by all parties. Only in these circumstances should an adult deviate from the behaviour management strategy of Chelsea FC.



**AT CHELSEA  
FC WE:**

- Have in place appropriate behaviour management policies
- Where appropriate, develop positive handling plans in respect of an individual child or young person
- Ensure a child's liberty is not restricted.



**THIS MEANS THAT  
ADULTS SHOULD:**

- Not use force as a form of punishment
- Always adhere to the organisation's behaviour management policy
- Try to defuse situations before they escalate
- Inform parents or carers of any behaviour management techniques used
- Be mindful of factors which may impact upon a child or young person's behaviour e.g. Bullying, abuse and where necessary take appropriate action by speaking with the Safeguarding Hub.

## 18. USE OF CONTROL AND PHYSICAL INTERVENTION

39	Context	>
40	Risk of harm to children and young people	>
41	Duty of care	>
42	Confidentiality	>
43	Making a professional judgement	>
44	Power and positions of trust	>
45	Propriety and behaviour	>
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There are circumstances in which adults working with children displaying extreme behaviours can legitimately intervene by using either non-restrictive or restrictive physical interventions. This is a complex area and adults and organisations must have regard to government guidance and legislation in the development and implementation of their own policies and practice.

The use of physical intervention should, wherever possible, be avoided. It should only be used to manage a child or young person's behaviour if it is necessary to prevent personal injury to the child, other children or an adult, to prevent serious damage to property or in what would reasonably be regarded as exceptional circumstances.

When physical intervention is used it should be undertaken in such a way that maintains the safety and dignity of all concerned.

The scale and nature of any physical intervention must be proportionate to both the behaviour of the individual to be controlled and the nature of the harm they may cause. The minimum necessary force should be used and the techniques deployed in line with recommended policy and practice.

**In exceptional circumstances, appropriate force may be used to:**

1. Control: either passive physical contact, such as standing between players or blocking a player's path, or active physical contact such as leading a player by the arm out of a classroom.
2. Restrain: to hold back physically or to bring a player under control. It is typically used in more extreme circumstances, for example when two players are fighting and refuse to separate without physical intervention.

### CRIMINAL ACTS

**Under no circumstances should physical force or intervention be used as a form of punishment.**

This would be deemed to be corporal punishment and would therefore constitute a criminal offence.

The duty of care, which applies to all adults and organisations working with children and young people, requires that reasonable measures be taken to prevent children being harmed. The use of unwarranted physical force is likely to constitute a criminal offence.

Should a young person have a diagnosed medical or behavioural need which requires them to be restrained for their own protection or protection of others, a individual care plans should be drawn up in consultation with parents/carers and where appropriate, the child, should set out the strategies and techniques to be used and those, which should be avoided. Risk assessments should be carried out where it is foreseeable that restrictive physical intervention may be required.

In all cases where physical intervention is employed the incident and subsequent actions should be documented and reported. This should include written and signed accounts of all those involved, including the child or young person. The parents/carers should be informed the same day.



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## AT CHELSEA FC WE:

- Have guidance in place on the use of physical intervention that complies with government guidance and legislation and describes the context in which it is appropriate to use physical intervention
- Ensure that an effective recording system is place which allows for incidents to be tracked and monitored
- Ensure adults are familiar with the above
- Train staff to ensure they are familiar with the policy and the expectations of the organisation
- Review policies regularly
- Advise parents/carers whenever restrictive physical intervention has been required
- Collate and analyse all instances of physical intervention over a period of time to ensure that all is being done to minimise such contact. Where possible, the environment should be modified to reduce the risks to children and young people of physical intervention.



## THIS MEANS THAT ADULTS SHOULD:

- Adhere to the Club's physical intervention guidance
- Always seek to defuse situations verbally and behaviourally. i.e. separating young people or allocating a time out period
- Always use minimum force for the shortest period necessary
- Record and report as soon as possible after the event any incident where physical intervention has been used
- Remain transparent in all instances where restrain or control is used or observed.



# 19. CHILDREN AND YOUNG PEOPLE IN DISTRESS

39	Context	>
40	Risk of harm to children and young people	>
41	Duty of care	>
42	Confidentiality	>
43	Making a professional judgement	>
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There is some work that the Club facilitates with young people; i.e. Foundation Community based work, where adults are involved in managing significant or regular occurrences of distress and emotional upset in children.

There may be occasions when a distressed child or young person requires comfort and reassurance from a member of CFC staff. Young children in particular, may need immediate physical comfort, for example after a fall or separation from parents etc.

## USE YOUR PROFESSIONAL JUDGEMENT



Adults should use their professional judgement to comfort or reassure a child in an age-appropriate way whilst maintaining clear professional boundaries. With children of any age it is advisable to avoid close body contact with the child's body.

## REPORTING A CONCERN

Where an adult has a particular concern about the need to provide this type of care and reassurance, or is concerned that an action may be misinterpreted, this should be reported and discussed with a senior manager (Designated Safeguarding Lead) and parents/carers.

## APPROPRIATE CONTACT

All contact should be considered on a case by case basis. A young child may seek to hug a member of staff, hold their hand or have an arm placed round their shoulder for reassurance.

For older young people in significant distress, it may be more appropriate to pat a child on their upper back or place an arm around their shoulder in a 'side hug' position.

In all instances, avoid prolonged physical contact with the child or young person. Always be aware that not all children require physical comfort in times of distress and time out, a drink of water and empathetic reassurance may suffice.



## THIS MEANS THAT ADULTS SHOULD:

- Consider the way in which they offer comfort and reassurance to a distressed child and do it in an age-appropriate way
- Be circumspect in offering reassurance in one to one situations, but always record such actions in these circumstances
- Follow professional guidance or code of practice where available
- Never touch a child in a way which may be considered indecent
- Never kiss a child or young person
- Record and report situations which may give rise to concern from either party
- Not assume that all children seek physical comfort if they are distressed
- Report any instances where a child or young person has initiated what could be considered inappropriate physical contact to the Designated Safeguarding Lead/Officer.

## 20. FIRST AID AND ADMINISTRATION OF MEDICATION

39	Context	>
40	Risk of harm to children and young people	>
41	Duty of care	>
42	Confidentiality	>
43	Making a professional judgement	>
44	Power and positions of trust	>
45	Propriety and behaviour	>
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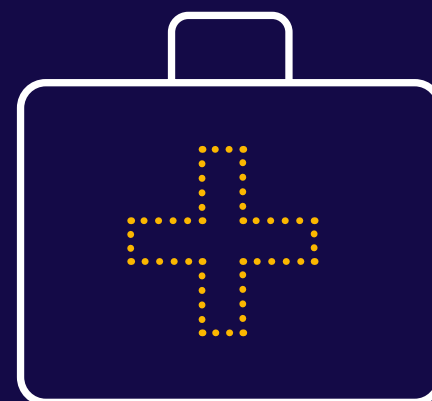
Health and safety legislation places duties on all employers to ensure appropriate health and safety policies and equipment are in place and an appropriate person is appointed to take charge of first-aid arrangements.

It is expected that adults working with children and young people should be aware of basic first aid techniques. They should be suitably trained and qualified before administering first aid and/or any agreed medication.

When administering first aid, wherever possible, adults should ensure that another adult is aware of the action being taken. Parents should always be informed when first aid has been administered. **(See specific departmental Club guidance; i.e. Foundation, Academy etc.)**

In circumstances where children need medication regularly, a health care plan should be established to ensure the safety and protection of children and the adults who are working with them. Depending upon the age and understanding of the child, they should where appropriate, be encouraged to self-administer medication or treatment including, for example any ointment, use of inhalers.

If a member of staff is concerned or uncertain about the amount or type of medication being given to a child/young person, this should be discussed with the appropriate senior colleague at the earliest opportunity.



- Ensure staff understand the extent and limitations of their role in applying basic care and hygiene tasks for minor abrasions and understand where an injury requires more experienced intervention
- Ensure there are trained and named individuals to undertake first aid responsibilities
- Ensure training is regularly monitored and updated
- Always ensure that arrangements are in place to obtain parental consent for the administration of first aid or medication.



- Adhere to the organisation's policy for administering first aid or medication and guidance on intimate safe practice
- Comply with the necessary reporting requirements
- Make other adults aware of the task being undertaken
- Explain to the child what is happening
- Always act and be seen to act in the child's best interests
- Report and record any administration of first aid or medication
- Have regard to any health plan which is in place
- Undertake health/risk assessment as appropriate, for certain activities.

## 21. ONE TO ONE SITUATIONS

39	Context	>
40	Risk of harm to children and young people	>
41	Duty of care	>
42	Confidentiality	>
43	Making a professional judgement	>
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Consideration should be taken when working on a one to one basis with young people.

It is not realistic to state that one to one situations should never take place. It is however, appropriate to state that where there is a need, agreed with a senior manager and/or parents/carers, for an adult to be alone with a child or young person, certain procedures and explicit safeguards must be in place. This also applies to those adults who do not work as part of Chelsea FC but owe a duty of care to the child or young person because of the nature of their work.

Adults should be offered specific training and guidance for the use of any areas of the workplace, which may place themselves or children in vulnerable situations. This would include those situations, for example: changing rooms, or taking a child to the toilet. Where adults work directly with children and young people in unsupervised settings and/or isolated areas within community settings or in street-based projects for example within our Foundation work.

One to one situations have the potential to make child/young person more vulnerable to harm by those who seek to exploit their position of trust. Adults working in one to one settings with children and young people may also be more vulnerable to unjust or unfounded allegations being made against them. Both possibilities should be recognised so that when one to one situations are unavoidable, reasonable and sensible precautions are taken. Every attempt should be made to ensure the safety and security of children and young people and the adults who work with them.

There are occasions where managers will need to undertake a risk assessment in relation to the specific nature and implications of one to one work. These assessments should take into account the individual needs of the child/young person and the individual worker and any arrangements should be reviewed on a regular basis.

Meetings with children and young people outside agreed working arrangements should not take place without the agreement of senior managers and parents or carers.

### THIS MEANS THAT ADULTS SHOULD:

- Ensure that when lone working is an integral part of their role, full and appropriate risk assessments have been conducted and agreed
- Avoid meetings with a child or young person in remote, secluded areas
- Always inform other colleagues and/or parents/carers about the contact(s) beforehand, assessing the need to have them present or close by. This will be dependent on the individual child or young person
- Avoid use of 'engaged' or equivalent signs wherever possible. Such signs may create an opportunity for secrecy or the interpretation of secrecy
- When working in the community, where appropriate and possible, leave the door open or position yourself whereby you can be reasonably seen when working alone with a child
- Avoid any unnecessary physical contact with a child when working alone
- Always report any situation where a child becomes distressed or angry to a senior colleague
- Carefully consider the needs and circumstances of the child/children when in one to one situations.

### THIS MEANS THAT CHELSEA FC SHOULD:

- Consider instances where a risk assessment may need to be undertaken in relation to the specific nature and implications of one to one work
- These risk assessments should take into account the individual worker and arrangements reviewed on a regular basis.



## 22. HOME VISITS

There are workers for whom home visits are an integral part of their work. In these circumstances it is essential that appropriate policies are followed and related risk assessments completed to safeguard children and young people and the adults who work with them.

A risk assessment (based on the tool devised by Barnardo's) should include an evaluation of any known factors regarding the child/young person, parents and others living in the household. Risk factors such as hostility, child protection concerns, complaints or grievances can make adults more vulnerable to an allegation.

**Specific consideration should be given to visits that are:**

**OUTSIDE 'OFFICE HOURS'**

**IN A REMOTE OR SECLUDED LOCATION**

Following an assessment, appropriate risk management measures should be in place before visits are agreed. Where little or no information is available, visits should not be made alone. There will be occasions where risk assessments are not possible or not available, e.g. when emergency services are used. In these circumstances, a record must always be made of the circumstances and outcome of the home visit. Such records must always be available for scrutiny.

Under no circumstances should an adult visit a child in their home outside agreed work arrangements or invite a child to their own home or that of a family member, colleague or friend.

### THIS MEANS THAT ADULTS SHOULD:

- Agree the purpose for any home visit with senior management, unless this is an acknowledged and integral part of their role e.g. social workers, player care team
- Adhere to agreed risk management strategies
- Always make detailed records including times of arrival and departure and work undertaken
- Ensure any behaviour or situation which gives rise to concern is discussed with their manager and, where appropriate action is taken.

### THIS MEANS CHELSEA FC:

- Ensure that they have home visit and lone-working guidance of which all adults are made aware. These should include arrangements for risk assessment and management
- Ensure that all visits are justified and recorded
- Ensure that adults are not exposed to unacceptable risk
- Ensure that adults have access to a mobile telephone and an emergency contact person.

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67	Trips and outings	>
68	Photography and video	>
69	Showers and changing	>
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73	Sharing concerns and recording incidents	>

## 23. TRANSPORTING CHILDREN AND YOUNG PEOPLE

39	Context	>
40	Risk of harm to children and young people	>
41	Duty of care	>
42	Confidentiality	>
43	Making a professional judgement	>
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There will be occasions when adults are expected or asked to transport children as part of their duties.

It is a legal requirement that all passengers should wear seat belts and it is the responsibility of the adult to ensure that this requirement is met. Adults should also be aware of current legislation and adhere to the use of car seats for younger children. Where adults transport children in a vehicle, which requires a specialist license/insurance e.g. PCV or LGV; only adults with the appropriate licence and insurance should drive such a vehicle.

It is inappropriate for adults to transport a child or young person outside their normal working duties. There may be occasions where the child or young person requires transport in an emergency situation or where not to give a lift may place a child at risk. Such circumstances must always be recorded and reported to a senior manager and parents/carers.

Refer to the Academy Transport Policy for specific guidance relating to Chelsea FC Academy.

### THIS MEANS THAT ADULTS SHOULD:

- Ensure they are fit to drive and free from any drugs, alcohol or medicine which is likely to impair judgement and/ or ability to drive
- Be aware that the safety and welfare of the child is their responsibility until they are safely passed over to a parent/carer
- Record details of the journey in accordance with agreed procedures
- Ensure that their behaviour is appropriate at all times
- Ensure that the driver and vehicle are compliant with the law
- Ensure that any impromptu or emergency arrangements of lifts are recorded and can be justified if questioned.

### THIS MEANS CHELSEA FC:

- Have appropriate policies for transporting children and young people available for all staff to access
- Check Insurance certificates of relevant staff on a regular (at least annual) basis to ensure they are covered for the business activity
- Obtain parental consent when appropriate.

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### BEST PRACTICE GUIDELINES:

- A person other than the planned driver should talk to the child about transport arrangements to check they are comfortable about the plans.
- Where possible and practical try to ensure there is more than one child in the car.
- It is advisable to avoid seating a child or young person in the front seat of a vehicle.
- When transporting children after a match or training session coaches/volunteers should try alternate which child is dropped off last where possible.
- If transport is part of a regular and formal arrangement with the Club, parental permission does not have to be sought each and every time. However, parental/carer consent must be explicitly obtained and the arrangements discussed and agreed in detail prior to the first journey.





## 24. CURRICULUM: SCHOOL BASED FOR ACADEMY PLAYERS

Whether in education settings or in informal settings, many areas of the curriculum can include or raise subject matter which is sexually explicit, or of an otherwise sensitive nature.

Care should be taken to ensure that resource materials cannot be misinterpreted and clearly relate to the learning outcomes identified by the lesson plan. This plan should highlight particular areas of risk and sensitivity.

The curriculum can sometimes include or lead to unplanned discussion about subject matter of a sexually explicit or otherwise sensitive nature. Responding to pupils' questions can require careful judgement and staff may wish to take guidance in these circumstances from a senior member of staff.

Within education settings, care should also be taken to abide by the Governing Body's Policy on Sex and Relationships Education and the wishes of parents. Parents have the right to withdraw their children from all or part of any sex education provided (but not from the biological aspects of human growth and reproduction necessary under the science curriculum).

### THIS MEANS THAT ADULTS SHOULD:

- Have clear written lesson plans
- Ensure that children and young people have the opportunity to explore sensitive topics in a safe and non-threatening environment
- Ensure that discussions are appropriate for the age and understanding of the child
- Ensure that discussions cannot be misinterpreted by children and young people or other adults.

### THIS MEANS THAT ADULTS SHOULD NOT:

- Enter into or encourage inappropriate offensive discussion about sexual activity
- Disclose sensitive personal information.

39	Context	>
40	Risk of harm to children and young people	>
41	Duty of care	>
42	Confidentiality	>
43	Making a professional judgement	>
44	Power and positions of trust	>
45	Propriety and behaviour	>
46	Dress and appearance	>
46	Personal living space	>
47	Adults accommodated on site	>
48	Gifts, rewards and favouritism	>
49	Infatuations	>
50	Communications with children and young people (including use of technology)	>
52	Social contact	>
53	Sexual contact	>
54	Physical contact	>
56	Other activities that require physical contact	>
57	Behaviour management	>
58	Use of control and physical intervention	>
60	Children and young people in distress	>
61	First aid and administration of medication	>
62	One to one situations	>
63	Home visits	>
64	Transporting children and young people	>
65	Transporting children and young people	>
<b>66</b>	<b>Curriculum</b>	<b>&gt;</b>
67	Trips and outings	>
68	Photography and video	>
69	Showers and changing	>
72	Access to inappropriate images and internet usage	>
73	Sharing concerns and recording incidents	>



## 25. TRIPS AND OUTINGS

39	Context	>
40	Risk of harm to children and young people	>
41	Duty of care	>
42	Confidentiality	>
43	Making a professional judgement	>
44	Power and positions of trust	>
45	Propriety and behaviour	>
46	Dress and appearance	>
46	Personal living space	>
47	Adults accommodated on site	>
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62	One to one situations	>
63	Home visits	>
64	Transporting children and young people	>
65	Transporting children and young people	>
66	Curriculum	>
<b>67</b>	<b>Trips and outings</b>	<b>&gt;</b>
68	Photography and video	>
69	Showers and changing	>
72	Access to inappropriate images and internet usage	>
73	Sharing concerns and recording incidents	>

Adults should take particular care when supervising young players and young people on trips and outings, where the setting is less formal than the usual workplace. Adults remain in a position of trust and need to ensure that their behaviour remains professional at all times and stays within clearly defined professional boundaries.

Where activities include overnight stays, careful consideration needs to be given to sleeping arrangements (**see Risk Assessment and Tour Procedure as followed by Chelsea Academy under Premier League Rules**).

Children, young people, adults and parents should be informed of these prior to the start of the trip. In all circumstances, those organising trips and outings must pay careful attention to ensuring safe staff/child ratios and to the gender mix of staff especially on overnight stays (**as per Premier League rules and guidance**).

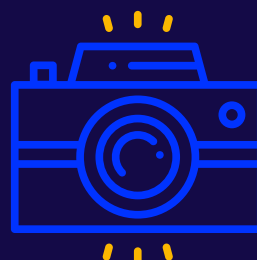
Health and Safety arrangements require adults to keep colleagues/employers aware of their whereabouts, especially when involved in activities outside the usual workplace.



### THIS MEANS THAT ADULTS SHOULD:

- Always have another adult present in out of workplace activities, unless otherwise agreed with a senior manager
- Undertake risk assessments in line with Chelsea FC's policy where applicable
- Have parental consent to the activity
- Ensure that their behaviour remains professional at all times
- Never share beds with a child/children or young people
- Not share bedrooms with children and young people with the exception of when it is part of a care plan and is dependent on an individual's care needs. A risk assessment of these arrangements must take place.

## 26. PHOTOGRAPHY AND VIDEOS



Working with children and young people may involve the taking or recording of images.

Any such work should take place in accordance with Chelsea FC (**or specific department policies; i.e. Foundation, RTC**); use of Images Policy and Social Media Policy with due regard to the law and the need to safeguard the privacy, dignity, safety and well-being of children and young people. Informed written consent from parents or carers and agreement, where possible, from the child or young person, should always be sought before an image is taken for any purpose (**see FA Safeguarding Guidance re: Use of Photographs**).

Careful consideration should be given as to how activities involving the taking of images are organised and undertaken. Care should be taken to ensure that all parties understand the implications of the image being taken especially if it is to be used for any publicity purposes or published in the media, or on the internet. There also needs to be an agreement as to whether the images will be destroyed or retained for further use, where these will be stored and who will have access to them.

Adults need to remain sensitive to any children who appear uncomfortable, for whatever reason, and should recognise the potential for such activities to raise concerns or lead to misunderstandings. Under no circumstances should adults take photographs of children or young people for their personal use.

**It is recommended that when using a photograph the following guidance should be followed:**

- If the photograph is used, avoid naming the player
- Establish whether the image will be retained for further use
- Images should be securely stored and used only by those authorised to do so.

### THIS MEANS THAT ADULTS SHOULD:

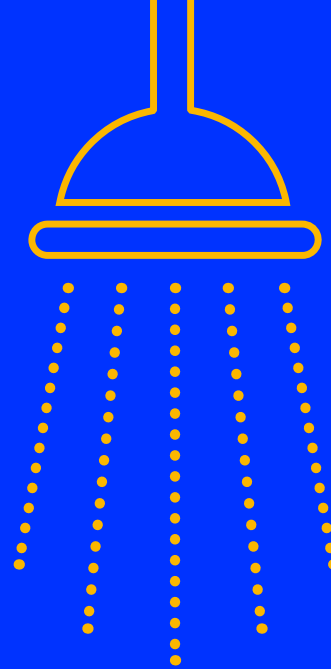
- Be clear about the purpose of the activity and about what will happen to the images when the activity is concluded
- Be able to justify images of children in their possession
- Avoid making images in one to one situations or which show a single child with no surrounding context
- Ensure the child/young person understands why the images are being taken and has agreed to the activity and that they are appropriately dressed
- Report any concerns about any inappropriate or intrusive photographs found
- Always ensure they have written parental permission to take and/or display photographs
- Always have explicit permission by the manager before taking any photographs
- Always use a camera provided by the organisation not a personal one unless agreed with line management.

### THIS MEANS THAT ADULTS SHOULD NOT:

- Display or distribute images of children unless they have consent to do so from parents/carers
- Use images which may cause distress
- Use mobile telephones to take images of children
- Take images 'in secret', or taking images in situations that may be construed as being secretive.

39	Context	>
40	Risk of harm to children and young people	>
41	Duty of care	>
42	Confidentiality	>
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63	Home visits	>
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65	Transporting children and young people	>
66	Curriculum	>
67	Trips and outings	>
<b>68</b>	<b>Photography and video</b>	<b>&gt;</b>
69	Showers and changing	>
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73	Sharing concerns and recording incidents	>





## 27. SHOWERS AND CHANGING

**FOR CONSIDERATION AT THE ACADEMY, ON SITE, ON TOURS AND IN HOST FAMILY ARRANGEMENTS. THIS GUIDANCE ALSO APPLIES TO EXTERNAL ACCOMMODATION AND FACILITIES.**

Young people are entitled to respect and privacy when changing clothes or taking a shower. However, there needs to be an appropriate level of supervision in order to safeguard young people, satisfy health and safety considerations and ensure that bullying or teasing does not occur.

This supervision should be appropriate to the needs and age of the young people concerned and sensitive to the potential for embarrassment.

Staff therefore need to be vigilant about their own behaviour, ensure they follow agreed guidelines and be mindful of the needs of the pupils.

### THIS MEANS THAT ADULTS SHOULD:

- Avoid any physical contact when children are in a state of undress
- Acknowledge that young children may need help. This should be exercised transparently and with the child's permission. Where ever possible encourage to children to dress independently – allowing for more time if needed
- Avoid any visually intrusive behaviour and allow children to have privacy whilst changing
- Exercise professional judgement to ensure children are safe within public changing facilities
- Supervise with two adults of the same gender (best practice).

### THIS MEANS THAT ADULTS SHOULD NOT:

- Change in the same place as children
- Shower with children.

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40	Risk of harm to children and young people	>
41	Duty of care	>
42	Confidentiality	>
43	Making a professional judgement	>
44	Power and positions of trust	>
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67	Trips and outings	>
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72	Access to inappropriate images and internet usage	>
73	Sharing concerns and recording incidents	>

## 27. SHOWERS AND CHANGING CONTINUED

39	Context	>
40	Risk of harm to children and young people	>
41	Duty of care	>
42	Confidentiality	>
43	Making a professional judgement	>
44	Power and positions of trust	>
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Chelsea FC Academy has private changing and showering facilities for children and young people. However, whilst on tour or at away games it may be necessary to use alternative facilities.

In addition, The Foundation operate within varied settings including: youth clubs, sport facilities and leisure centres. This may require the use of toilets, changing and showering amenities. External facilities may have their own policy and procedures detailing the use of changing and showering areas to which Chelsea FC may be required to adhere as part of a facilities usage agreement.



### BEST PRACTICE GUIDANCE WHEN USING FACILITIES SHARED BY ADULTS, CHILDREN AND YOUNG PEOPLE:

- Where facilities are intended to be used by both adults and children there must be access to separate changing, showering and toilet areas. Alternatively if there is only one changing or showering facility, allocated timeslots for adults and young people can be a solution.
- If children or young people with disabilities require changing facilities, ensure they and their parents/carers are involved in deciding how they should be assisted. Ensure the child or young person is able to consent to the assistance that is offered.
- The use of photographic equipment by club officials, members, parents and young people is prohibited within areas where children and young people are changing or showering.
- Where no changing facilities are available, children and young people, parents/carers and travelling clubs should be made aware prior to the game or session and advised to make alternative arrangements and to take appropriate additional clothing e.g. tracksuits etc.



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68	Photography and video	>
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## TOILETS

There are some instances in which children may require supervision when using toilet facilities. This is especially the case when external sports and leisure facilities are used.

Effective supervision may be required to ensure that children are not exposed to undue risk when using toilets. This is important where toilet facilities may be in use by adults and young people.



### BEST PRACTICE GUIDELINES:

- Where possible, inform another member of staff that you will be accompanying a child or children to the toilet.
- Check the toilet facilities and ensure that there are no other adults using the cubicle before the child enters.
- Where you are supervising groups of children, it is advisable to wait until adults using the facilities are finished to enable children to use the toilet in succession.
- Wait outside the cubicle for the child to use the toilet. Allow young people to have privacy—standing just outside the facility may be appropriate.
- Ensure children are not left unsupervised with other adults whilst using the toilet.
- Where a child needs assistance with personal care, this should be agreed with parents/carers and line management prior to the event. This includes tasks like wiping or cleaning after using the toilet. Avoid these tasks unless previously agreed. Children should be encouraged to toilet themselves.



## 28. ACCESS TO INAPPROPRIATE IMAGES AND INTERNET USAGE

### SEE CLUB USE OF SOCIAL MEDIA POLICY

There are no circumstances that will justify adults possessing indecent images of children. Adults who access and possess links to such websites will be viewed as a significant and potential threat to children.

Where indecent images of children or other unsuitable material are found, the Police and Local Authority Designated Officer (LADO) service should be immediately informed via the Head of Safeguarding. Adults should not attempt to investigate the matter or evaluate the material themselves, as this may lead to evidence being contaminated, which in itself can lead to a criminal prosecution.

Accessing, making and storing indecent images of children on the internet is illegal. This will lead to criminal investigation and the individual being barred from working with children and young people, if proven.

Adults should not use equipment belonging to Chelsea FC to access adult pornography; neither should personal equipment containing these images or links to them be brought into the workplace. This will raise serious concerns about the suitability of the adult to continue to work with children and young people.

Adults should ensure that children and young people are not exposed to any inappropriate images or web links. The Club and Chelsea FC staff will ensure that internet equipment used by children has the appropriate controls with regards to access. E.g. personal passwords should be kept confidential.



#### AT CHELSEA FC WE:

- Have clear e-safety policies in place about access to and use of the internet
- Make guidance available to both adults and children/young people about appropriate usage.



#### THIS MEANS THAT ADULTS SHOULD:

- Be aware of Chelsea FC's guidance on the use of IT equipment
- Ensure that children are not exposed to unsuitable material on the internet
- Ensure that any films or material shown to children and young people are age appropriate.

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40	Risk of harm to children and young people	>
41	Duty of care	>
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## 29. SHARING CONCERNS AND RECORDING INCIDENTS

39	Context	>
40	Risk of harm to children and young people	>
41	Duty of care	>
42	Confidentiality	>
43	Making a professional judgement	>
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45	Propriety and behaviour	>
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66	Curriculum	>
67	Trips and outings	>
68	Photography and video	>
69	Showers and changing	>
72	Access to inappropriate images and internet usage	>
<b>73</b>	<b>Sharing concerns and recording incidents</b>	<b>&gt;</b>

Individuals should be aware of Chelsea FC's Safeguarding Procedures, including the clubs procedures for dealing with allegations against adults. All allegations must be taken seriously and properly investigated in accordance with local procedures and statutory guidance.

Adults who are the subject of allegations are advised to contact their professional association.

In the event of any allegation being made to someone other than a manager, information should be clearly and promptly recorded and reported to a senior manager without delay. Refer to Chelsea FC's Allegation Management guidance for more information.

Adults should always feel able to discuss with their line manager any difficulties or problems that may affect their relationship with children and young people so that appropriate support can be provided or action can be taken.

It is essential that accurate and comprehensive records are maintained wherever concerns are raised about the conduct or actions of adults working with or on behalf of children and young people.



**AT CHELSEA  
FC WE:**

- Have an effective, transparent and accessible system for recording and managing concerns raised by any individual in the workplace.



**THIS MEANS THAT  
ADULTS SHOULD:**

- Be familiar with their organisation's system for recording concerns
- Take responsibility for recording any incident(s), and passing on that information where they have concerns about any matter pertaining to the welfare of an individual in the workplace.



# RESPONDING AND REPORTING



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- 92 Disclosures of abuse from children and young people >
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## KEEPING CHILDREN SAFE

All staff and volunteers at Chelsea FC have a responsibility to promote the welfare of children and young people. We have a responsibility to notice and respond appropriately and swiftly when there are concerns around abuse or the welfare of a child or young person. This responsibility equally applies to concerns about a child's life at home, school and other environments; and to concerns around a child's treatment by family, peers or professionals.

### This guidance includes information on:

- Behavioural and physical indicators of abuse
- Responding to disclosures of abuse from children and young people
- Reporting concerns and making referrals



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# 1. TYPES OF ABUSE AND MALTREATMENT

Abuse describes any action that causes harm to a child or young person. Abuse can occur in any setting and can be carried out by adults or young people. Whether experienced over a long period of time, or an isolated incident, abuse can have a significant impact on children's health and well-being.

## NEGLECT

Neglect is the ongoing failure to meet a child's basic needs and is the most common form of child abuse. This can include a lack of adequate clothing; nourishing food; shelter; supervision and medical or health care.

A child experiencing neglect may be put in danger or not protected from physical or emotional harm. Neglect can also describe when a child is not shown the love, care and attention that they need from their caregiver.

## EMOTIONAL ABUSE

This describes the ongoing emotional maltreatment of a child or young person. Emotional abuse can include deliberately scaring, worrying or humiliating a child. Emotional abuse is sometimes known as 'psychological abuse' and can include isolating a child, ignoring or avoiding them.

## PHYSICAL ABUSE

Physical abuse is deliberately hurting a child or causing injuries such as bruises, broken bones, burns or cuts. This can be perpetrated by adults or other children and young people. Physical abuse is not accidental and includes behaviour such as hitting, kicking, poisoning, burning, throwing objects. Shaking and hair pulling are also considered to be physical abuse.

## SEXUAL ABUSE

A child or young person is sexually abused when they are forced, persuaded or coerced to take part in sexual activities.

### This can include:

- sexual touching of any part of the body whether the child's wearing clothes or not
- rape or penetration by putting an object or body part inside a child's mouth, vagina or anus
- forcing or encouraging a child to take part in sexual activity
- making a child take their clothes off, touch someone else's genitals or masturbate

Sexual abuse doesn't have to include physical contact. Non-contact abuse involves non-touching activities, such as grooming, exploitation, persuading children to perform sexual acts over the internet and flashing.

### This can include:

- encouraging a child to watch or hear sexual acts
- online abuse including making, viewing or distributing child abuse images
- allowing someone else to make, view or distribute child abuse images
- showing pornography to a child

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## CHILD SEXUAL EXPLOITATION

Child sexual exploitation (CSE) is a type of sexual abuse. It describes a situation when a child or young person is coerced into sexual activities by one or more person(s) who have deliberately targeted their youth and inexperience in order to exercise power over them.

In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Child sexual exploitation doesn't always involve physical contact and can happen online.

Some children and young people are trafficked into or within the UK, from place to place, for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs.

### Grooming

Grooming is when someone builds an emotional connection with a child in order to gain their trust for the purposes of sexual abuse.

Groomers can be male or female and can be an adult or young person. Groomers do this by:

- pretending to be someone they are not, for example saying they are the same age online
- offering advice, understanding and attention
- buying gifts or taking children on holiday or outings
- using their professional position or reputation

### Points to consider

It is important to remember that child abuse can affect any child or young person regardless of their age, gender, ethnicity, religion or socio-economic position. Abuse can be perpetrated by family members, family friends, professionals or other young people. Children and young people may experience multiple types of abuse at one time. It is important to also be aware that children may experience abuse from multiple people.

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## 2. SIGNS AND INDICATORS OF ABUSE

Abuse describes any action that causes harm to a child or young person. Abuse can occur in any setting and can be carried out by adults or young people. Whether experienced over a long period of time, or an isolated incident, abuse can have a significant impact on children's health and well-being.

### ONE OR MORE OF THE FOLLOWING MIGHT TRIGGER CONCERNS ABOUT A CHILD:

- A sudden change in behaviour
- Something a child says
- Physical signs of abuse

The signs of abuse are not always obvious. There can be behaviours that children display that might indicate that they are experiencing abuse. Sometimes, physical signs of abuse might be noticeable – however it is important to remember that this is not always the case. On the following page there are some of the signs and indicators that could suggest a child is at risk, or is experiencing abuse.

### PHYSICAL AND BEHAVIOURAL SIGNS

Not all children experiencing abuse will display the physical and behavioural signs listed on page 97. Some may experience a combination of behaviours that change over time. Other children may try to hide any physical signs that something is happening to them.

You might notice some of the signs but feel unsure about whether abuse is going on. It is not your responsibility to investigate suspected abuse.

**You have a responsibility to report your concerns.** You can get advice and support about the next steps to take to keep the child safe by making contact with the Safeguarding Hub.



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CATEGORY OF ABUSE	PHYSICAL SIGNS	BEHAVIOURAL SIGNS
<b>PHYSICAL ABUSE</b>	<ul style="list-style-type: none"> <li>• unexplained and unusual bruising</li> <li>• finger and strap marks</li> <li>• injuries</li> <li>• cigarette burns</li> <li>• bite marks</li> <li>• fractures</li> <li>• scald</li> <li>• missing teeth</li> </ul>	<ul style="list-style-type: none"> <li>• fear of contact</li> <li>• aggression</li> <li>• temper</li> <li>• running away</li> <li>• fear of going home</li> <li>• reluctance to change or uncover body</li> <li>• depression</li> <li>• withdrawal</li> <li>• bullying or abuse of others</li> </ul>
<b>NEGLECT</b>	<ul style="list-style-type: none"> <li>• constant hunger</li> <li>• ill-fitting or inappropriate clothes</li> <li>• weight change</li> <li>• untreated conditions</li> <li>• continual minor infections</li> <li>• failure to supply hearing aids, glasses and/or inhalers</li> </ul>	<ul style="list-style-type: none"> <li>• always being tired early or late</li> <li>• absent</li> <li>• few friends</li> <li>• regularly left alone</li> <li>• stealing</li> <li>• no money</li> <li>• parent or carer not attending or supportive</li> </ul>
<b>SEXUAL ABUSE</b>	<ul style="list-style-type: none"> <li>• genital pain</li> <li>• itching</li> <li>• bleeding</li> <li>• bruising</li> <li>• discharge</li> <li>• stomach pains</li> <li>• discomfort</li> <li>• pregnancy</li> <li>• incontinence</li> <li>• urinary infections or STDs</li> <li>• thrush</li> <li>• anal pain on passing motions</li> </ul>	<ul style="list-style-type: none"> <li>• apparent fear of someone</li> <li>• nightmares</li> <li>• running away</li> </ul>
<b>BULLYING</b>	<ul style="list-style-type: none"> <li>• weight change</li> <li>• unexplained injuries and bruising</li> <li>• stomach and headaches</li> <li>• bed-wetting</li> <li>• disturbed sleep</li> <li>• hair pulled out</li> </ul>	<ul style="list-style-type: none"> <li>• apparent fear of someone</li> <li>• nightmares</li> <li>• running away</li> </ul>
<b>EMOTIONAL ABUSE</b>	<ul style="list-style-type: none"> <li>• weight change</li> <li>• lack of growth or development</li> <li>• unexplained speech disorders</li> <li>• self-harm</li> <li>• clothing inappropriate for child's age</li> <li>• gender or culture etc.</li> </ul>	<ul style="list-style-type: none"> <li>• unable to play</li> <li>• fear of mistakes</li> <li>• fear of telling parents</li> <li>• withdrawn</li> <li>• unexplained speech and language difficulties</li> <li>• few friends</li> </ul>

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## 3. PEER-ON-PEER ABUSE

### PURPOSE AND AIM

Children and young people may be harmful to one another in a number of ways which would be classified as peer-on-peer abuse. The purpose of this policy is to explore the many forms of peer-on-peer abuse and include a planned and supportive response to the issues.

### INTRODUCTION TO ABUSE AND HARMFUL BEHAVIOUR

Abusive behaviour can happen to players in a club setting. It is necessary to consider what peer-on-peer abuse looks like, how it can be managed and what appropriate support can be put in place to meet the needs of the individual. Preventive strategies must also be considered to prevent future harm to children and young people.

Abuse is abuse and should never be tolerated or passed off as 'banter' or 'part of growing up'. Equally, abuse issues can sometimes be gender specific. For example, girls being sexually touched or assaulted and boys being subject to initiation or hazing type violence (Keeping Children Safe In Education, 2018). It is important to consider the forms abuse may take and the subsequent actions required.

### TYPES OF ABUSE

There are many forms of abuse that may occur between peers and this list is not exhaustive.

#### Physical abuse

Physical abuse may include hitting, kicking, nipping, shaking, biting, hair pulling, or otherwise causing physical harm to another person. There may be many reasons why a child harms another. It is important to understand why a young person has engaged in such behaviour (including accidental) before considering the action or punishment to be undertaken.

#### Harmful sexual behaviour/sexual abuse

Sexually harmful behaviour from young people is not always contrived or with the intent to harm others. There may be many reasons why a young person engages in sexually harmful behaviour and it may be just as distressing to the young person who instigates it as it is for the young person it is intended towards. Sexually harmful behaviour may range from inappropriate sexual language or inappropriate role play, to sexually touching another or sexual assault/abuse.

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## SEXTING

Sexting is when someone sends or receives a sexually explicit text, image or video. This includes sending ‘nude pics’, ‘rude pics’ or ‘nude selfies’. Pressuring someone into sending a nude picture can happen in any relationship and to anyone, whatever their age, gender or sexual preference.

However, once the image is taken and sent, the sender has lost control of the image and these images could end up anywhere. By having it in their possession, or distributing indecent images of a person under 18 to another person, young people are not even aware that they could be breaking the law as stated as these are offences under the Sexual Offences Act 2003.

## BULLYING

Bullying is unwanted, aggressive behaviour among school-aged children that involves a real or perceived power imbalance. The behaviour is repeated, or has the potential to be repeated, over time. Both young people who are bullied and who bully others may have serious, lasting problems.

In order to be considered bullying, the behaviour must be aggressive and include:

- **An imbalance of power:** Young people who bully and use their power — such as physical strength, access to embarrassing information, or popularity—to control or harm others. Power imbalances can change over time and in different situations, even if they involve the same people.
- **Repetition:** Bullying behaviours happen more than once or have the potential to happen more than once.

Bullying includes actions such as making threats, spreading rumours, attacking someone physically or verbally or for a particular reason (e.g. size, hair colour, gender, sexual orientation) and excluding someone from a group on purpose.



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## CYBERBULLYING

Cyberbullying is the use of phones, instant messaging, e-mail, chat rooms or social networking sites such as Instagram and Twitter to harass, threaten or intimidate someone for the same reasons as stated above.

It is important to state that cyber bullying can very easily fall into criminal behaviour under the Malicious Communications Act 1988 under Section 1. This act states that electronic communications which are indecent or grossly offensive, convey a threat or false information or demonstrate that there is an intention to cause distress or anxiety to the victim would be deemed to be criminal. This is also supported by the Communications Act 2003, Section 127 which states that electronic communications that are grossly offensive or indecent, obscene or menacing, or false, used again for the purpose of causing annoyance, inconvenience or needless anxiety to another could also be deemed to be criminal behaviour.

If the behaviour involves the use of taking or distributing indecent images of young people under the age of 18 then this is also a criminal offence under the Sexual Offences Act, 2003. Outside of the immediate support young people may require in these instances, the Club will have no choice but to involve the police to investigate these situations.

## INITIATION/HAZING

Hazing is a form of initiation ceremony which is used to induct newcomers into an organisation such as a private school, sports team etc. There are a number of different forms, from relatively mild rituals to severe and sometimes violent ceremonies.

The idea behind this practice is that it welcomes newcomers by subjecting them to a series of trials which promote a bond between them. After the hazing is over, the newcomers also have something in common with older members of the organisation, because they all experienced it as part of a rite of passage. Many rituals involve humiliation, embarrassment, abuse, and harassment.

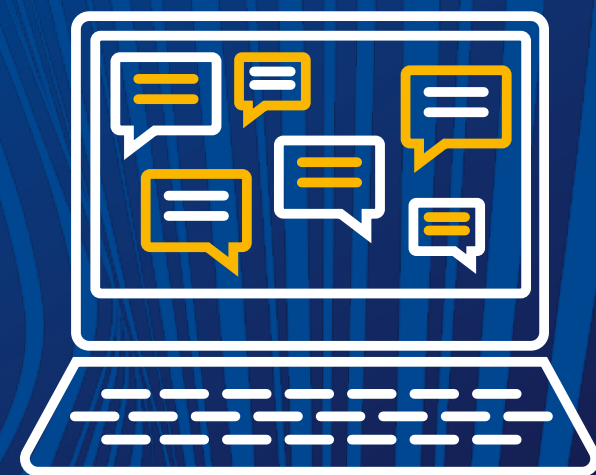
## PREJUDICED BEHAVIOUR

The term 'prejudice-related' bullying refers to a range of hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society. In particular, prejudices to do with disabilities and special educational needs, ethnic, cultural and religious backgrounds, gender, home life, (for example in relation to issues of care, parental occupation, poverty and social class) and sexual identity (Lesbian, Gay, Bisexual, Transgender).

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## TEENAGE RELATIONSHIP ABUSE

Teenage relationship abuse can also be known as 'partner abuse'. It can be defined as a pattern of actual or threatened acts of physical, sexual, and/or emotional abuse, perpetrated by an adolescent (between the ages of 13 and 18) against a current or former partner. Abuse may include insults, coercion, social sabotage, sexual harassment, threats and/or acts of physical or sexual abuse. The abusive teen uses this pattern of violent and coercive behaviour, in a heterosexual or same gender relationship, in order to gain power and maintain control over the partner.



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# RESPONDING TO CONCERNS AROUND PEER-ON-PEER ABUSE

Although the type of abuse may have a varying effect on the victim and initiator of the harm, these steps can help clarify the situation and establish the facts before deciding the consequences for those involved in perpetrating harm.

It is important to deal with a situation of peer abuse immediately and sensitively. It is necessary to gather the information as soon as possible to get the true facts around what has occurred. It is equally important to deal with it sensitively and think about the language used and the impact of language on both the children and the parents/carers when they become involved.

Avoid using the word “perpetrator”, as this can quickly create a ‘blame’ culture and leave a child labelled. Instead try to use the child’s name and speak of the behaviour shown in a factual manner.

In all cases of peer-on-peer abuse, it is necessary that all staff are trained in dealing with such incidents, talking to young people and instigating immediate support in a calm and consistent manner. Staff should not be prejudiced, judgemental, dismissive or irresponsible in dealing with such sensitive matters.

## STEPS TO TAKE

### 1. Contact the Departmental Safeguarding Lead/Officer or Safeguarding Hub

The Safeguarding Hub are able to provide information and guidance on the actions required to gather further information and ensure the safety of all children and young people involved. The Safeguarding Hub work collaboratively with staff involved to establish a safety plan and consider which agencies will need to be contacted where appropriate.

### 2. Gather the facts

After consulting with the Safeguarding Hub, it may be determined that it is appropriate to speak to all the young people involved separately, gain a statement of facts from them and use consistent language and open questions for each account. The easiest way to do this is not to have a line of questioning but to ask the young people to tell you what happened. Only interrupt the young person from this to gain clarity with open questions, ‘where, when, why, who’.

#### What happened?

#### Who observed the incident?

#### What was seen?

#### What was heard?

#### Did anyone intervene?

Do not attempt to view, record or otherwise transfer or send evidence of sexting or bullying where this involves indecent imagery of children or young people. In this instance, gain advice from the Safeguarding Hub.

Statements from the child(ren) or young person(s) will begin to inform the risk assessment. A risk assessment will take into account:

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## INTENT

1. Has this been a deliberate or contrived situation for a young person to be able to harm another?
2. Age of the children involved?
3. How old are the young people involved in the incident and is there any age difference between those involved?
4. Where did the incident or incidents take place?
5. Was the incident in an open, visible place to others? If so was it observed? If not, is more supervision required within this particular area?
6. What was the explanation by all children involved of what occurred?
7. Can each of the young people give the same explanation of the incident and also what is the effect on the young people involved?
8. Is the incident seen to be bullying for example, in which case regular and repetitive?
9. Is the version of one young person different from another and why?
10. What is each of the children's own understanding of what occurred?
11. Do the young people know/ understand what they are doing? E.g. do they have knowledge of body parts, of privacy and that it is inappropriate to touch? Is it the young person's explanation in relation to something they may have heard or been learning about that has prompted the behaviour?

## FREQUENCY AND IMPACT

1. Has the behaviour been repeated to an individual on more than one occasion?
2. Has the behaviour persisted to an individual after the issue has already been discussed or dealt with and appropriately resolved?
3. Does the young person have an understanding of the impact of their behaviour on the other person?



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# DETERMINING THE NEXT STEPS

Remain in contact with the Departmental Safeguarding Lead/ Officer if this is not you. They will continue to liaise with the Safeguarding Hub to assess the level of risk posed to all children and young people involved.

If, from the information gathered, it is determined that any young person is, or is likely to be at significant harm, a safeguarding referral Children's Services will be made. Where a crime has been committed, the Police will also be involved. As a Club, we will then take the appropriate actions as advised by statutory services.

If social care and the Police intend to pursue the case further, they may ask to interview the young people at the Club and may ask for parents to attend the Club to be spoken to also. It is important to be prepared for every situation and the potential time this may take.

Dependent on the case, Children's Services may assess the case information and conclude that it does not meet the Local Authority's threshold criteria. In this instance, Chelsea FC are entitled to challenge the decision with the social worker and their line management if this is deemed appropriate.

Alternatively, it may be that there is agreement with Children's Services and Police decision-making. In this case, both Children's Services and Police are likely to make recommendations for Chelsea FC to manage the risk and prevent future harm.

## INFORMING PARENTS

Chelsea FC are committed to working collaboratively with young people and their parents and carers. In particular cases, it may not be safe or appropriate to inform parents and carers prior to referring to statutory services. Decisions to inform parents and carers should be made in collaboration with the Safeguarding Hub, seeking advice from Children's Services where appropriate.

There may be instances when children and young people express that they do not want their parent or carer to be made aware of the incident or circumstances of peer abuse. This is a very complex issue that requires careful consideration. The child's understanding of the situation, their judgment and rationale must all be considered.

If a child or young person is deemed 'Gillick Competent' according to 'Fraser' guidelines and does not wish for the Club to share the information with parents/carers, the Club must consider this request. This is especially relevant in a case where a young person is pregnant and this is why they are being bullied. Other examples may pertain to circumstances around a young person using contraception or sexual health services. However, it is important to remember that a child's request for confidentiality may not be honoured if they have suffered or are deemed at risk of suffering significant harm.

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In all circumstances where the risk of harm to the child is evident, the Club will encourage and support the young person to share the information with their parent or carer. An appropriate member of staff may be enlisted to assist with this in cases where a child or young person is scared or nervous to tell their parents what may have happened.

When considering informing parents or carers or taking the decision not to, the Club must evidence that we are acting in the best interests of the child or young person. This decision is made in consultation with appropriate services and a clear rationale must be evidenced in written form.

If it is deemed safe and appropriate to do so, the most sensitive way to inform parents and carers of peer abuse is face-to-face. Whilst this can be time consuming, the nature of the incident and the type of harm/abuse a young person may be suffering is usually very sensitive. It can cause fear and anxiety to parents whether their child is the child who was harmed or who harmed another. Face-to-face conversation can provide more clarity and demonstrate greater empathy.

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# ONGOING PREVENTION AND SUPPORT

Once the outcome of the incident(s) has been established it is necessary to ensure future incidents of abuse do not occur again and consider the support and intervention required for those involved.

## FOR THE YOUNG PERSON WHO HAS BEEN HARMED

The support children and young people require depends on the individual. It may be that they wish to seek counselling or one-to-one support via a mentor. It may also be that they feel able to deal with the incident(s) on their own or with support of family and friends. In which case it is necessary that this young person continues to be monitored and offered support should they require it in the future.

If the incidents are of a bullying nature, the young person may need support in improving peer groups and relationships with other young people. Some restorative justice work with all those involved may be required.

Other interventions that could be considered may target a whole year group or squad, for example a guest speaker or workshop on cyber bullying, relationship abuse etc. It may be that through the continued curriculum of Personal, Social and Health Education (PSHE), these issues can be discussed and debated more frequently.

If the young person feels particularly vulnerable, it may be that a risk assessment can be put in place for them whilst at Chelsea FC to ensure they have someone named that they can talk to, support strategies for managing future issues and identified services to offer additional support.

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## FOR THE YOUNG PERSON WHO HAS DISPLAYED HARMFUL BEHAVIOUR

In this circumstance it is important to find out why the young person has behaved in such a way. It may be that the young person is experiencing their own difficulties and may even have been harmed themselves in a similar way.

In such cases, support such as one-to-one mentoring or counselling may also be necessary. Particular support from identified services may be necessary through a Common Assessment Framework/Strengthening Families/Early Help referral via the Local Authority. The young person may also require additional support from family members.

Once the support required to meet the individual needs of the young person has been met, it is important that young person receives a consequence for their behaviour. This may be in the form of restorative justice e.g. making amends with the young person they have targeted if this has been some form of bullying.

In the cases of harmful sexual behaviour it may be a requirement for the young person to engage in one-to-one work with a particular service or agency. If it is determined that a crime has been committed, this ongoing work may be through the Police or Youth Offending Service.

If there is any form of criminal investigation ongoing, it may be that this young person cannot continue with their training or be educated on site until the investigation has concluded. In which case, the young person will need to be provided with appropriate support and education whilst off site.

Even following the conclusion of any investigation, the behaviour that the young person has displayed may continue to pose a risk to others. In this case, an individual risk assessment may be required. Risk assessments are completed with support from the Safeguarding Hub and take a multi-agency approach to ensure that the needs of the young person and the risks towards others are measured by all agencies involved, including the young person and their parents/carers. This may mean additional supervision of the young person or protective strategies if the young person feels at risk of engaging in further inappropriate or harmful behaviour.

The Club may also choose a punishment as a consequence such as exclusion or internal exclusion/inclusion/seclusion for a period of time to allow the young person to reflect on their behaviour.

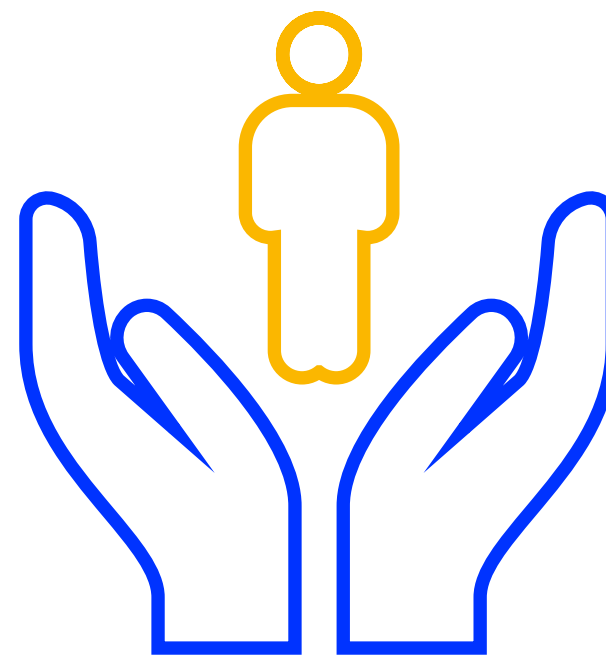
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## AFTER CARE

It is important that following the incident the young people involved continue to feel supported and receive help even if they have stated that they are managing the incident. Sometimes the feelings of remorse, regret or unhappiness may occur at a much later stage than the incident. It is important to ensure that the young people do not engage in any further harmful behaviour either towards someone else or to themselves as a way of coping (e.g. self-harm).

In which case, regular reviews with the young people following the incident(s) are imperative and will be supported by the Safeguarding Hub as part of the ongoing safety planning.



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## PREVENTATIVE STRATEGIES

At Chelsea FC, we recognise that creating a safe environment with robust safeguarding policies and practices is essential to keep children safe and well. We also understand that peer-on-peer abuse has the potential to occur on any site despite the most stringent of policies and support mechanisms in place.

### Therefore, it is essential that Chelsea FC continue to:

- Recognise and manage risks and learn how to improve and move forward with strategies in supporting young people to talk about any issues and through sharing information with all staff.
- Ensure that the Club has an open environment where young people feel safe to share information about anything that is upsetting or worrying them.
- Where appropriate, we have a strong and positive PSHE curriculum that tackles such issues as prejudiced behaviour, sexting and relationship abuse and gives children an open forum to talk things through rather than seek one-on-one opportunities to be harmful to one another.
- Ensure adults who work with young people are confident and enabled to talk about issues and challenge perceptions of young people, including use of inappropriate language and behaviour towards one another.
- Enable staff training and continued professional development around indicators of abusive behaviours.
- Communicate to young people in a way that continues to create an open and honest environment without prejudice.
- Take seriously all potentially abusive behaviour and do not dismiss issues as 'banter' or 'growing up' or compare them to their own experiences of childhood.
- Avoid minimising concerns raised by young people.
- Consider each issue and each individual in their own right before taking action.
- Signpost support available to young people in the event that they don't feel confident raising an issue to staff or a peer. This includes the development of an online player portal that empowers young people to play a part in finding their own solutions.
- Engage with external services and support programmes who are able to provide support and expertise to young people about specific issues.
- Ensure young people are part of changing their circumstances and that of the procedures within the Club.
- Listen to and empower players to evoke changes in their own culture at the Club and develop 'rules of acceptable behaviour' whereby all young people understand the boundaries of behaviour before it becomes abusive.

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## 4. DISCLOSURES OF ABUSE FROM CHILDREN AND YOUNG PEOPLE

This guidance is designed to be used by members of staff at Chelsea FC. It contains advice and information on the steps to take if a child or young person tells you, or indicates that they have been, or are being abused.

All members of staff and volunteers at Chelsea FC have a responsibility to act on any concerns or disclosures of abuse from children and young people.

There are situations whereby a child or young person may disclose that they are the victim of abuse. Dependent on their age, development and relationship with others, they may not recognise the behaviour as abuse.

They may have an inherent feeling that something is not right and want to tell someone what may be happening.

It is important to create an environment and culture that enables children to feel that they can safely disclose abuse. Children and young people need to feel that the adults around them will believe what they are saying. They need to feel that the person they've told can be trusted to help make it stop and help them to access support.

### This guide includes information about:

- Different types of disclosures from children and young people
- The next steps to take if a child or young person tells you they have been abused
- The reasons why children sometimes do not speak about abuse

### CREATING A SAFE ENVIRONMENT

Chelsea Football Club is committed to creating an open environment and culture where children and young people, parents and other stake holders are encouraged and supported to report:

- Suspicions or concerns of abuse
- Malpractice/poor practice
- Unethical behaviours

### We have created an environment in which:

- Children are respected and listened to
- Clear boundaries and safe behaviours are encouraged and expected
- Clear and transparent policies and procedures are in place for all staff and volunteers
- We have accountable and transparent management structures so that complaints are not ignored or swept under the carpet

It is important to note that children and young people do not always tell others about abuse they are experiencing. Be alert to a child's physical presentation, behaviour and well-being as these can be indicators that something isn't right. It is important to report any concern you might have to a Designated Safeguarding Lead/Officer or directly to the Safeguarding Hub.

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## DISCLOSURE IS RARELY A LINEAR PROCESS

Children and young people can make disclosure in a number of ways including: verbally or non-verbally, directly or indirectly.

## TYPES OF DISCLOSURE

**Purposeful** – a child or young person may verbally tell someone directly what is happening.

**Elicited disclosure** – when someone (an adult or peer) asks a young person directly about behaviour they have seen or physical indicators of abuse i.e. a professional notices a bruise on a child and asks them what has happened.

**Accidental disclosures** – these are characterised by abuse coming to light unintentionally. In such cases, the young people had not intended to disclose. Someone may see evidence of abuse or the perpetrator may be discovered by somebody else.

**Indirect disclosures** – these can be non-verbal, for example writing letters, texts or drawings to convey that abuse is happening. Disclosures can also be behavioural. Young people may show signs and signals which (consciously or unconsciously) alert someone to the abuse, for example acting out, self-harming or “seeking attention” with their behaviour.

Young people may use words to indirectly describe what is happening to them. They may explain abuse in terms that they feel comfortable using – this might not be the language that adults immediately recognise as abuse. This could involve slang, swearing or euphemisms.

Young people may also speak about a ‘friend’ or family member that is experiencing abuse. This could be based on truth. It can also be a way to start to talk about abuse in a way that the young person finds more comfortable. Professionals should be mindful that it is not their role to investigate or determine the validity of disclosures from children. All disclosures should be responded to in line with this guidance.

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## DELAYED DISCLOSURES & RETRACTIONS

Children who have experienced abuse may tell others about it gradually – this can be months or years after abuse has occurred. ‘Non-recent’ abuse is an allegation of abuse made by or on behalf of someone who is now 18 years or over, relating to an incident which took place when the alleged victim was under 18 years old. Disclosures of this nature should be treated in the same way as any other disclosure of abuse. Many children remain silent, deny that it happened, or produce a series of disclosures of abuse followed by retractions. This is a normal response to trauma and abuse and should not be taken as sign that the disclosure is false. There are many reasons that a child may retract a disclosure of abuse: fear of professional intervention, worry about the consequences, and fear of the abuser. The child may also be experiencing ongoing abuse after disclosing from another adult.

## WHO DO CHILDREN DISCLOSE TO?

Research tells us that children and young people are most likely to tell a friend or sibling about abuse. After peers, mothers are most likely to be told about abuse. However, the likelihood of this will depend on the child’s expected response from their mother or carer. Of all professionals, teachers are the most likely to receive disclosures from children.

Be aware that you may receive a disclosure from a child about another young person such as a friend or their family member. This should be responded to in the same way as a disclosure about the child themselves.

## FACTORS THAT PREVENT CHILDREN FROM DISCLOSING

1 in 3 children who are sexually abused do not tell anyone at the time of it occurring and there are many reasons why. Understanding these reasons can help us to create an environment where children and young people feel able to disclose what is happening to them.

Victims are often encouraged to keep the abuse secret, either through systematic grooming, threats, violence or emotional abuse.

Other factors can also prevent children from disclosing abuse:

- Fear instilled in the child by the perpetrator either through threats of physical force or violence.
- Offenders tell children no one will believe them; and that even if someone does believe them, they will be blamed for the abuse.
- Offenders threaten members of the family and their pets.
- Offenders tell the child they will get into trouble if anyone finds out about the abuse. (This is especially impacting if the perpetrator is a family member or has a close relationship with the family).



## CHILDREN WITH DISABILITIES

The aforementioned barriers can impact all children and young people and make it difficult for them to disclose abuse. Research suggests that disabled children are at greater risk of physical, sexual and emotional abuse and neglect than non-disabled children. Similarly, children with disabilities can face additional challenges when attempting to tell, or otherwise communicate to someone that they are being abused.

### These barriers can include:

- Difficulties in communicating and seeking help.
- More limited opportunities for disabled children to seek help from someone outside the home.
- Lack of understanding that what is happening is abusive.
- Increased dependency on others for help and care. This can make children more vulnerable to emotional and physical abuse used by a perpetrator to prevent them disclosing.

Research also tells us that attitudes and beliefs around disability can mean that sometimes, professionals attribute signs of abuse to the child's condition or disability. Physical marks and behavioural indicators may be overlooked and seen as part of their disability and not indicative of abuse.

Professional curiosity is essential when working with all children and young people. This ensures that we continuously challenge assumptions and do not always unquestioningly accept the things we see at face value.

## RESPONDING TO A DISCLOSURE

Children and young people can disclose when you are not expecting it. For example, when driving in the car with a child, you may be more likely to receive a disclosure. For some young people, it can feel easier to talk as it feels less direct or confrontational as eye contact is decreased.

It is important to consider that disclosures will not always happen when in a one-to-one situation or when there is time and space. It can be helpful to think beforehand about the way you might respond to a child or young person if they choose to disclose.

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## PREPARATION

- Have an understanding of the signs and indicators that should cause concern.
- Think about what you might say/do before acting.
- Be sensitive – arrange a safe and private environment for the child to talk if this is safe and possible.

## DURING

- Listen to what the child says carefully, without interrupting.
- Keep an open mind about what you are told and take any disclosure seriously, even if you cannot see any injury which would support the story.
- Stay calm – do not show shock or horror.
- Be responsive – acknowledge how difficult it was for the child to tell, explain what needs to happen next. Reassure the child and let them know that they were right to tell and they have done nothing wrong.
- Don't promise confidentiality but explain that information will only be shared when it is for their protection or support.

## AFTER

- Do not delay action in response to a disclosure.
- At the earliest opportunity make a written record.
- Do not be afraid of being wrong, or be concerned about starting an investigation.
- Discuss your concerns about a child with your line manager, a Designated Safeguarding Lead/Officer or Safeguarding Hub.
- Be supportive – work collaboratively with the Safeguarding Hub to put arrangements in place for initial support for the child.

If a child is in immediate danger or requires urgent medical attention call 999.

It is important to note that children and young people do not always tell others about abuse they are experiencing. Be alert to a child's physical presentation, behaviour and well-being as these can be indicators that something is not right.

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## 5. REPORTING CONCERNS & MAKING REFERRALS

All CFC staff have a responsibility to promote children and young people's welfare, ensure their safety; and protect them from harm or abuse.

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

**It is important that you report any concerns to either one of the following;**

- Designated Department Safeguarding Lead or Officer
- Head of Safeguarding
- Safeguarding Manager

### TAKING NO ACTION IS NOT AN OPTION

1. You can report safeguarding concerns via phone call to share initial details of the incident. In most cases the designated Safeguarding Lead/Officer will then complete a CFC Safeguarding Children Referral Form and refer it to the Safeguarding Hub.
2. The Safeguarding Hub will then assess the concerns based on the information given and plan the next steps and actions required to keep the child or children safe.

**These actions can include:**

- Information sharing or referrals to other agencies
- Safety planning
- Gathering further and/or clarifying information

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## MEDICAL ATTENTION

If it appears that a child requires urgent medical attention, arrange for the child to be taken to hospital (normally this means calling an ambulance). The child should be accompanied by a member of staff. This staff member must inform medical staff that non-accidental injury is suspected. At this point, inform a member of the Safeguarding Hub. Parents must also be informed that the child has been taken to hospital.

## REFERRALS TO CHILDREN'S SERVICES

**The Safeguarding Hub must complete a referral to Local Authority Children's Services/Social Care within 24 hours if they have information to suggest a child or young person:**

- May have suffered significant harm
- Is at risk of suffering significant harm
- Is suffering significant harm

If there are concerns regarding the conduct of a staff member towards a child or young person, a referral to the local LADO must be completed within 24 hours. Please refer to Chelsea FC's Allegation Management Policy for further information.

## WHAT HAPPENS WHEN A REFERRAL TO CHILDREN'S SERVICES IS COMPLETED?

A referral is completed by the Safeguarding Hub and sent to the appropriate Local Authority Children's Services. A record is made of who made the referral and the time it was sent. This record is stored on the child's safeguarding file.

If parents/carers have not been informed, it will be established with the Local Authority when and by whom they will be informed. Other actions that need to be taken to keep the child or children safe will be discussed with the Local Authority.

Upon receiving a written referral, a member of the Local Authority duty team should report back to the Club's Safeguarding Hub within 24 hours to outline the action to be taken. If this is not completed the Safeguarding Hub will seek the information from the Local Authority. If there is no response, the Safeguarding Hub will contact the Local Authority Designated Officer (LADO).

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## CONSULTING PARENTS PRIOR TO MAKING A REFERRAL TO THE LOCAL AUTHORITY

Parents and carers permission, or the child's, where appropriate, should be sought before discussing a referral to other agencies.

See 'Working together to Safeguard Children (2018)' for further information and guidance.

**If possible, any concerns about a child's welfare should be discussed with parents/carers provided that this will not:**

- Possibly place the child at increased risk
- Possibly place staff at risk
- Cause a delay in referring if contact cannot be made

If there are doubts or reservations about involving parents and carers, the Safeguarding Hub will seek advice from the local authority. CFC must always record the reasons for not discussing safeguarding concerns with parents/carers.

If parents or carers refuse to give consent for information to be shared and Chelsea FC remain concerned about the safety of the child or young person, the Safeguarding Hub will continue to complete a referral to Local Authority and/or other relevant agencies if they are already involved with the young person.

Chelsea FC must always record the reasons for dispensing with parental consent.

## EXCEPTIONAL CIRCUMSTANCES

If it is feared that the child might be at immediate risk on leaving the Club, take advice from Local Authority or the Police. Remain with the child until the allocated Social Worker takes responsibility.

## INFORMATION SHARING

In cases involving possible child abuse, the Club has a duty to share information.

**The Head/Safeguarding Manager and Safeguarding Leads/Officers will ensure that:**

- Only factual information is shared
- Information is shared appropriately and confidentially with the appropriate professionals
- Information is logged on the child or young person's chronology/file

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## JOINT WORKING WITH OTHER AGENCIES

Chelsea FC recognises that inter-agency working is essential if children are to receive effective targeted support as early as possible.

**We are committed to initiating and supporting inter-agency work including:**

- Early Help Assessment Framework
- Child Protection case conferences, core groups and other multi-agency meetings
- Joint working with School's Education Welfare Officer & Education Welfare Service
- Multi-agency review/planning meetings
- Working with Youth & Family Support Services
- Working with Child & Adolescent Mental Health Services

## REMAINING CHILD-CENTRED

Listening to children and young people is an important and essential part of safeguarding them against abuse and neglect. To this end, any expression of dissatisfaction or disquiet in relation to an individual child/young person will be listened to and acted upon to in order to safeguard his/her welfare.

We will seek to develop resilience in the children and ensure that they are aware that they can seek help and support. Children will be made aware of the opportunities available to them to seek advice and support formally and informally.

## WHAT NEXT?

**It is important that you report any concerns to either one of the following;**

- Designated Department Safeguarding Lead or Officer
- Head of Safeguarding
- Safeguarding Manager

Taking no action is not an option.

For more information or specific advice and guidance, please contact the Safeguarding Hub: [Safeguarding@chelseafc.com](mailto:Safeguarding@chelseafc.com)

## 6. REFERRAL AND ALLEGATION MANAGEMENT PATHWAY

There are at least four circumstances in which a child may be at risk of harm and a referral to Chelsea FC Safeguarding Hub is necessary:

1

Concerns about the behaviour of a member of Chelsea FC staff or volunteer towards a child or young person

2

Concerns about the welfare or safety of a child or young person outside of football (regarding their home life, school or other environment)

3

Concerns about the behaviour or conduct of another organisations staff member or volunteer

4

Concerns about the risk posed to a child or young person by a peer

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1

**WHEN THERE ARE CONCERNS ABOUT A MEMBER OF CFC STAFF OR VOLUNTEER**

See Chelsea FC's Allegation Management guidance for further information.

**Concerns about the behaviour of a member of staff, coach or volunteer towards a child/children**

(e.g. suspicions or allegations of poor practice or possible abuse)

**Notify your designated Safeguarding Lead/Officer**

**Safeguarding Lead/Officer completes Chelsea FC internal referral form and then sends it to the Head of Safeguarding**

**Head of Safeguarding, in consultation with frontline staff, consider next steps**

**Poor practice/  
breach of  
codes of  
conduct**

**Possible child  
abuse/criminal  
offence**

**Refer to the Allegation Management guidance for further information on the next steps and possible outcomes.**

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## 2

## WHEN THERE ARE CONCERNS ABOUT CHILDREN ARISING OUTSIDE OF SPORTS

**Member of staff, coach or volunteer made aware of concerns about child's welfare or safety**

E.g. suspicions of bullying at school, allegations of abuse within the family etc.



**Notify your designated Safeguarding Lead/Officer**



**If a child requires immediate medical attention, arrange this and ensure that the medic is informed that there may be a child protection concern or allegation**



**Safeguarding Lead/Officer completes Chelsea FC internal referral form and then sends it to the Head of Safeguarding**



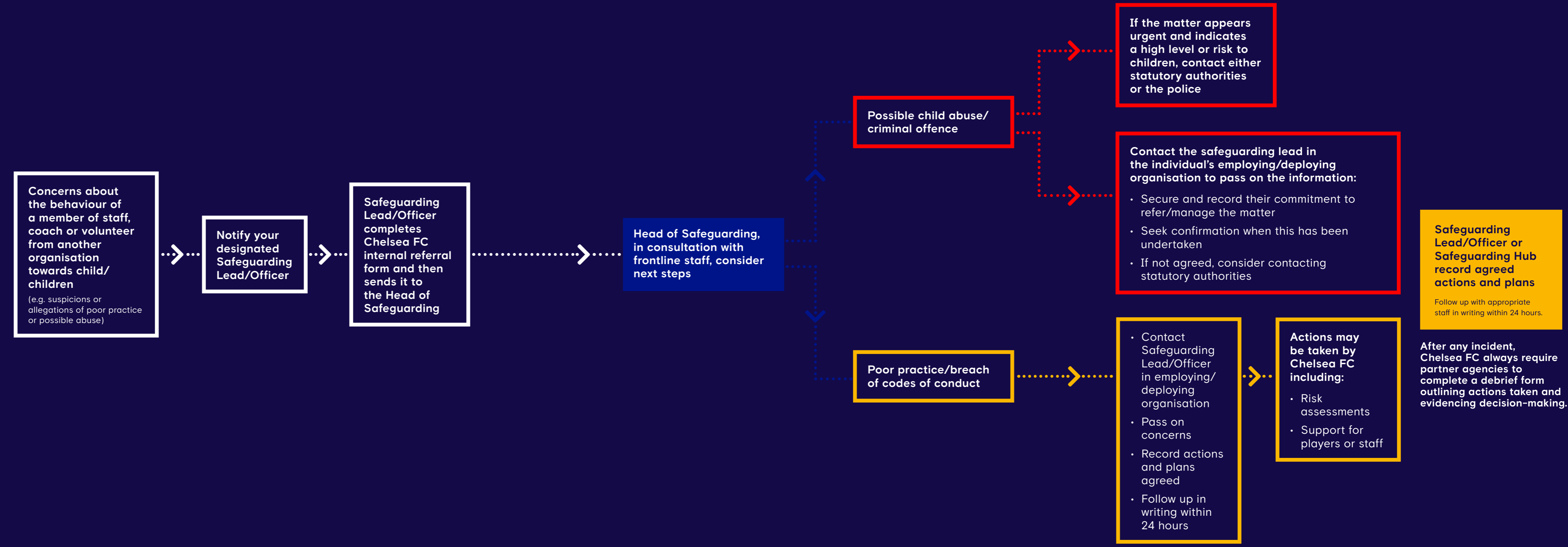
**Head of Safeguarding makes decision on immediate referral or consultation with social care or Police records actions taken/agreed**

(including who will inform parents)

**After any incident, Chelsea FC always require partner agencies to complete a debrief form outlining actions taken and evidencing decision-making.**

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**3** WHEN THERE ARE CONCERNS ABOUT THE BEHAVIOUR OF ANOTHER ORGANISATION'S STAFF MEMBER OR VOLUNTEER

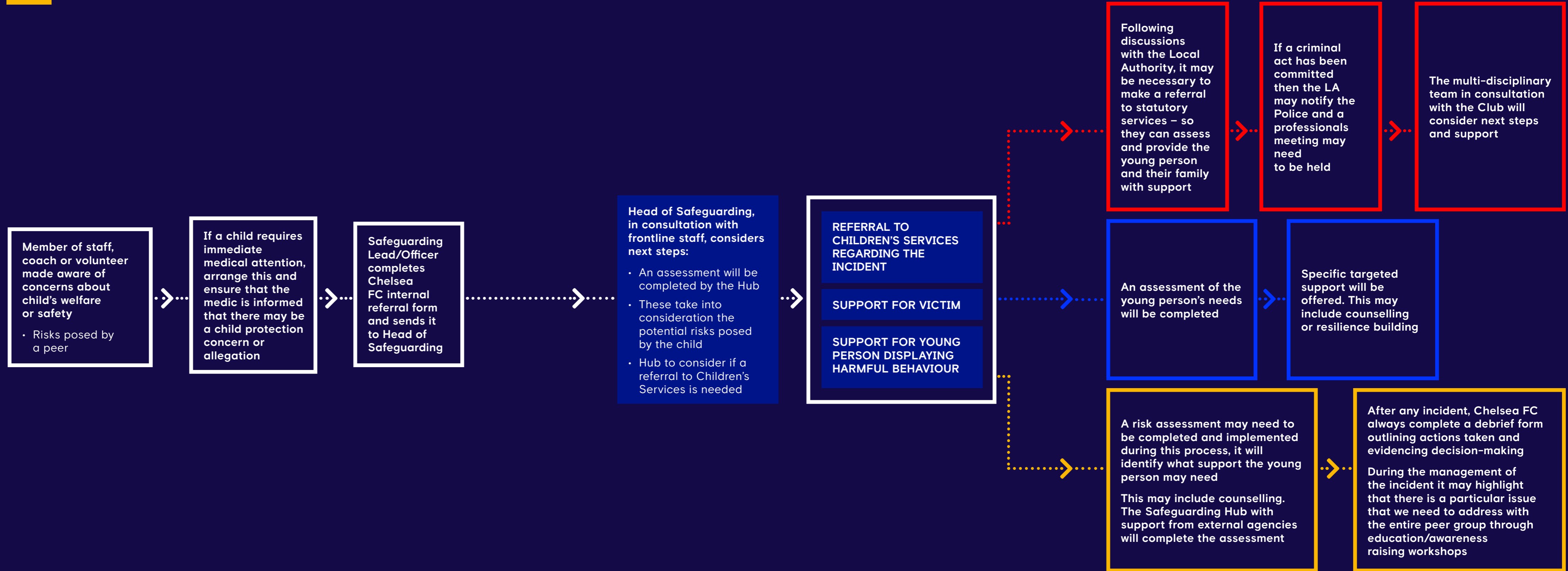


- 75 Context >
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After any incident, Chelsea FC always require partner agencies to complete a debrief form outlining actions taken and evidencing decision-making.



**4** WHEN THERE ARE CONCERNS ABOUT THE RISK POSED TO A CHILD BY A PEER



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# SAFEGUARDING RECORD KEEPING



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- 108 Why keep records? >
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## AIMS AND PRINCIPLES:

Good communication and record keeping is essential to ensure, and provide evidence of, high quality and effective safeguarding processes. Members of Chelsea FC staff and employees are required to compile and keep numerous records and reports. These records must be accurate, securely stored and current. Good record keeping is an essential part of the role of safeguarding.

Effective record keeping enables all staff to comply with all legal and regulatory requirements and ensures the service we provide to people is transparent with necessary accountability. Record keeping ensures that if and when incidents or accidents occur, Chelsea FC have evidence detailing the actions taken and individuals involved.

This is essential to ensure causes of incidents and accidents can be identified and measures put in place to prevent a reoccurrence. Accurate recording is also a protective mechanism for staff as it ensures all members of staff are able to provide a record of their role in any situation which may arise and the rationale for their actions.

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# 1. WHY KEEP RECORDS?

The function of record keeping whether at an individual, team or organisational level is to:

- Manage the day-to-day operation of a project, service area or department within the Club and Foundation
- Help improve accountability
- Evidence how decisions related to people who use our services were reached and who was involved in the decision making process
- Support effective service delivery
- Support effective care, support and communication between the people who use our services and staff teams
- Make continuity of care and support easier
- Provide documentary evidence of actions undertaken
- Ensure outcomes are able to be identified easily
- Help to identify and manage risk
- Provide evidence of regular monitoring and evaluating of the service provided
- Promote better communication and sharing of information between Chelsea FC and partnering organisations
- Provide evidence for internal and external audits
- Help to address complaints or where appropriate legal processes.

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## 2. STANDARDS FOR SAFE AND EFFECTIVE RECORD KEEPING

The following standards must be met to ensure the Club and Foundation's record keeping is both effective and safe:

- Policies and procedures for recording and handling information about the people who use our services are in place including confidentiality and data protection.
- Record keeping systems are maintained and regularly monitored.
- Staff are trained in the operation of recording systems and understand the scope of their authority to access information.
- Staff understand and work in line with the requirements of the Data Protection Act 1998.
- Records are written in a clear, concise and impartial manner and are dated and signed by the author.

### WHAT HAPPENS IF YOU DISAGREE WITH THE ACCURACY OF THE RECORDING?

There may be times when there is a disagreement about the validity or accuracy of a recording. In these instances, this discrepancy should be noted on the file and the matter referred to a manager for review. Upon the review of a senior manager, if agreement is not reached, mediation between the two parties should take place. If an appropriate arrangement cannot be reached, all members of staff and participants of Chelsea FC services are able to use the Chelsea FC complaints procedure if they wish.

## 3. TYPES OF RECORDS COVERED BY THIS POLICY

The principles of good record keeping apply to all types of records, regardless of how they are held.

### Including:

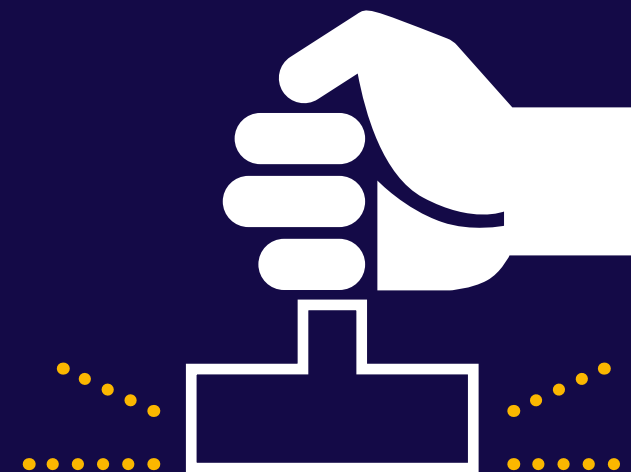
- Handwritten records/computerised recordings
- Emails both internal and external
- Letters to and from partner agencies
- Incident reports and statements
- Photographs and videos
- Text messages, WhatsApp messages and all other instant messages
- Photographs/DVDs

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## 4. PRINCIPLES OF GOOD RECORD KEEPING

- All handwriting must be legible and clear. Records should be readable when photocopied or scanned.
- All entries to records should be signed and dated by the person completing the record.
- Records must be accurate and recorded in such a way that the meaning is clear if referenced at a later point in time.
- Records of incidents should be documented as soon as possible after the event.
- Records must be factual and not include unnecessary abbreviations, jargon, meaningless phrases, opinion or speculation.
- Judgement must be used to decide what is relevant and what should be recorded. If you are unsure seek advice from the Safeguarding Hub or a Designated Safeguarding Lead/Officer.
- Where appropriate, records must provide clear evidence of decision making and rationale. Records should clearly identify any risks or issues that have arisen and evidence of the action taken to deal with them.
- Records in diaries/ communication books etc. if of a sensitive nature should be locked away when not in use.
- You must not alter or destroy any records without being authorised to do so.
- In the unlikely event that a recording needs to be altered, place a note on the system to advise that the note is incorrect. Ensure that the alterations made, and the original record, are clear and auditable. Do not score out, write over or remove original entry.
- Additions to existing records must also be signed and dated by the writer. Records should provide an evidence trail in the event of an incident occurring. This will provide protection for our players and staff working across the entire Club.
- Do not use coded expressions of sarcasm or 'humorous' abbreviations to describe young people, families or colleagues.
- Do not falsify records.

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## 5. STORAGE OF RECORDS

All records and information must be stored appropriately, safely and securely.

All notes and referrals must be recorded and kept on the safeguarding database.

Staff should never send confidential or sensitive information using their personal email addresses.

Staff should never send confidential or sensitive information using their personal email addresses.

## 6. CONFIDENTIALITY

All staff must be fully aware of the legal requirements and guidance regarding confidentiality and ensure their practice is in line with these requirements and the Chelsea FC Confidentiality and Data Protection Policy. When completing records either on paper or on computer screens, no information should be left where unauthorised staff, people who use the service or visitors, might see it.

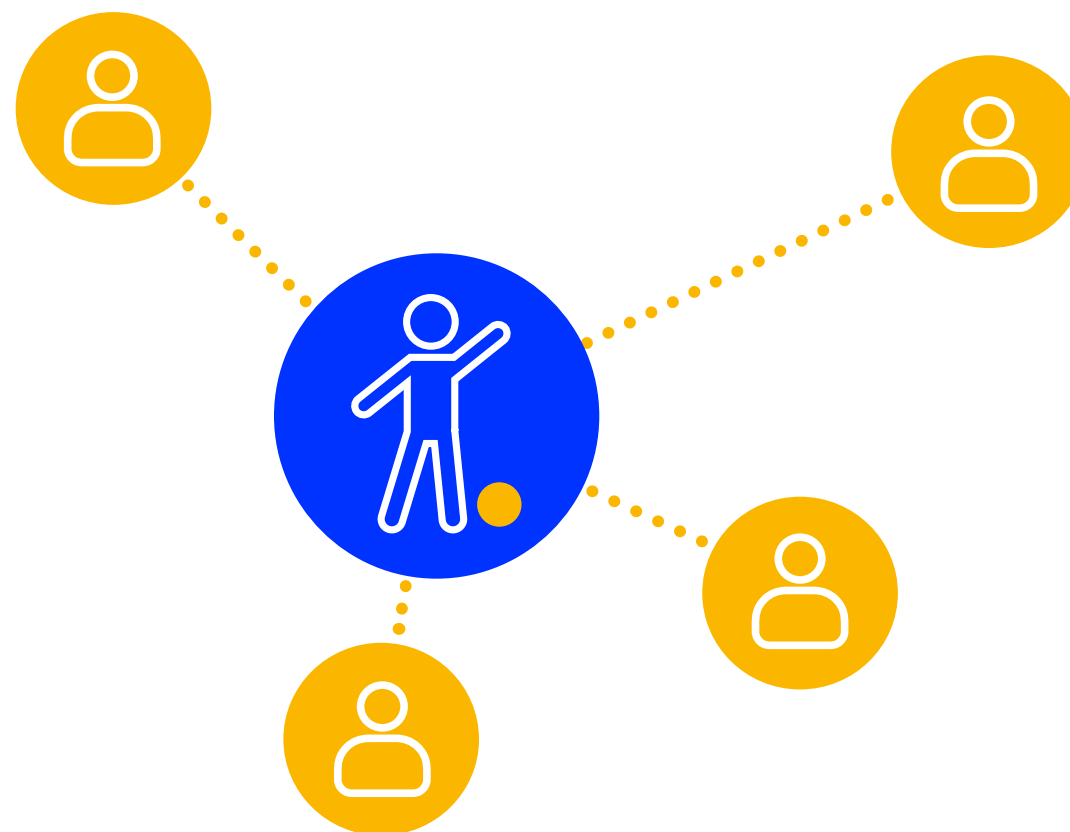


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## 7. SHARING OF INFORMATION

Players and their families must be informed that information and records held at the Club (including The Foundation) may be seen by other people or agencies involved with their development. They must be reassured that the information will only be shared on a need to know basis.

Information that can identify a person that we support must not be used or disclosed for purposes other than a child protection matter without the individual's explicit consent. However, this information can be released if the law requires it. The law allows members of staff to disclose information if it will help to prevent, detect, investigate or punish serious crime or if it will prevent abuse or serious harm to others. This must be explained to players and their families and be included in the information packs given to each individual. Members of staff are encouraged to seek advice from the Safeguarding Hub if at all unsure about a request to share personal information.



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## 8. PERSONAL AND PROFESSIONAL STANDARDS

All staff must be able to meet the following standards:

- Ensure all records are accurate and up-to-date and that information remains confidential.
- Ensure only relevant, appropriate and authorised people have access to information.
- Be aware of, and know how to use, the information systems and tools that are available.
- Passwords to access information systems must not be shared and records must not be left open to access when not being used.
- Staff should not store and take home sensitive information relating to players or staff on computer memory sticks/ flash drives unless provided by Chelsea FC.

Chelsea FC have a responsibility to:

- Update staff on changes to legislation case law and national and local policies relating to information and record keeping.
- Audit records to evaluate the standard of record keeping and communication and identify areas for improvement.
- Implement recommendations from audits and reviews.

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# 9. TRAINING

All staff must be trained in the use of the organisation’s records systems, including:

- The various records and systems
- Their responsibilities in recording information
- The Confidentiality & Data Protection Policy
- Responsibilities under the Data Protection Act 1998. This training must take place during a new member of staff’s induction period.

If issues arise regarding recording skills, formal courses may be accessed; this will be initiated by the Head of Safeguarding and HR.



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# ALLEGATION MANAGEMENT

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120	The management of allegations against staff or volunteers	>
122	Organised and non-recent abuse	>
123	Roles and responsibilities	>
125	General considerations relating to allegations and concerns of abuse	>
126	Confidentiality	>
127	Support	>
128	Club action	>
129	Whistle-blowing	>
130	Allegation management process	>
131	Initial response to an allegation or concern	>
133	Strategy meeting	>
134	Allegations against staff in their personal lives	>
135	Sharing information	>
136	Record keeping	>
137	Monitoring progress	>
138	Outcomes	>
139	Referring to DBS	>
140	Debrief	>



Managing allegations is a core aspect of safe organisational practice. Within Chelsea Football Club, this is adhered to in order to promote a safe practice environment for activities involving vulnerable people; both adults and children.

This practice has been developed through external, national and local guidance and underpinned through the clubs policies and procedures.

<b>116</b>	<b>Context</b>	<b>&gt;</b>
117	Scope	>
119	Good practice	>
120	The management of allegations against staff or volunteers	>
122	Organised and non-recent abuse	>
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# 1. SCOPE

These procedures should be followed by Chelsea Football Club by virtue of us providing services for children and young people; employing staff or volunteers who work with or care for children (including our host family provision).

This policy and procedure is in line with Local Safeguarding Children Board (LSCB) procedures within the Local Authorities where Chelsea FC is operating these services.

The procedure applies to historical information relating to current or previous Chelsea FC staff. All reported historical allegations should be responded to in the same way as contemporary concerns.

Compliance with these procedures ensures that allegations of abuse are dealt with expeditiously; consistently and through a thorough and fair process. The LSCB monitor and evaluate the effectiveness of this process.

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<b>117</b>	<b>Scope</b>	>
119	Good practice	>
120	The management of allegations against staff or volunteers	>
122	Organised and non-recent abuse	>
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125	General considerations relating to allegations and concerns of abuse	>
126	Confidentiality	>
127	Support	>
128	Club action	>
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130	Allegation management process	>
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116	Context	>
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## When should it be applied?

These procedures should be applied when there is an allegation or concern that any person who works with children, in connection with his or her employment or voluntary activity, has:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children; or
- For staff for whom the Keeping Children Safe in Education Statutory Guidance for Schools and Colleges (2018) applies – behaved towards a child or children in a way that indicates he/she would pose a risk of harm if they work regularly or closely with children.

## RESOURCES



### Chelsea Football Club Safeguarding Children Policy

Available on Chelsea FC Intranet

Detailed guidance can be found for schools and all education establishments in **Keeping Children Safe in Education: Statutory Guidance for School and Colleges (September 2018)**

[www.gov.uk/government/publications/keeping-children-safe-in-education--2](http://www.gov.uk/government/publications/keeping-children-safe-in-education--2)

Additional statutory guidance has been issued '**Disqualification under the Childcare Act 2006**' (2015) which replaced the supplementary advice that was issued by the Department for Education on 10th October 2014

[www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006](http://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006)

### Working Together to Safeguard Children 2018

[www.gov.uk/government/publications/working-together-to-safeguard-children--2](http://www.gov.uk/government/publications/working-together-to-safeguard-children--2)

### Premier League

[www.premierleague.com/safeguarding](http://www.premierleague.com/safeguarding)

### Football Association

[www.thefa.com/football-rules-governance/safeguarding](http://www.thefa.com/football-rules-governance/safeguarding)

### Child Protection in Sport Unit

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

## 2. GOOD PRACTICE: FOLLOWING LOCAL SAFEGUARDING BOARD PROCEDURES

Our contact with children, young people and vulnerable adults occurs across a number of Local Authorities across England:

### THE ACADEMY

The Academy – within the Surrey Safeguarding Children Board (SSCB):

[www.surreyscb.procedures.org.uk/qkpph](http://www.surreyscb.procedures.org.uk/qkpph)  
Section 3.2 Allegations Against Staff, Carers & Volunteers

### STAMFORD BRIDGE

Stamford Bridge – within the Bi-borough and Hammersmith & Fulham Safeguarding Children Board:

[www.rbkc.gov.uk/lscb/information-professionals-and-volunteers/lado-managing-allegations](http://www.rbkc.gov.uk/lscb/information-professionals-and-volunteers/lado-managing-allegations)

### FOUNDATION'S INTERNATIONAL PROGRAMMES

Our contact with children, young people & vulnerable adults also occurs across international locations via the Foundation's International Programmes.

The Foundation follow Chelsea Football Club's Reporting Concerns procedures.

Chelsea FC follow good practice principles under Local Safeguarding Children Board. The following actions should be followed:

Report all concerns regarding poor practice to your Safeguarding Lead (or Officer if applicable)

All concerns should then be reported to the Head of Safeguarding. The Head of Safeguarding is obligated to follow:

- FA & Premier League Regulations
- Chelsea FC Safeguarding Procedures
- Local Safeguarding Children Board

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LOCAL PROCEDURES





### 3. THE MANAGEMENT OF ALLEGATIONS AGAINST STAFF OR VOLUNTEERS

#### Allegations against adults who work with children and young people

There may be occasions when allegations of abuse are made against members of staff or volunteers.

Local Safeguarding Children Boards (LSCBs) have arrangements in place for monitoring and evaluating the management of such allegations. The Head of Safeguarding at Chelsea FC is responsible for making initial enquiries with the appropriate Local Authority Designated Officer.

These LSCB procedures should be applied to all allegations made against a member of staff. This process and procedure mirrors the process adopted by Chelsea FC. This procedure is applicable when there is an **allegation** or **concern** that any person who works with children has:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children

Whilst some behaviours may not constitute a criminal offence, and some may not reach the threshold of Significant Harm, consideration will need to be given as to whether they may indicate unsuitability to work with children. This will be determined in consultation with the Local Authority Designated Officer (LADO).

Any such behaviours should be considered within the context of the four categories of abuse (i.e. physical, sexual, emotional, and neglect). These include concerns relating to inappropriate relationships between members of staff and children and young people, for example:

- Having a sexual relationship with a child under 18 if in a position of trust in respect of that child, even if consensual (see sections 16-19 Sexual Offences Act 2003)
- 'Grooming', i.e. meeting a child under 16 with the intent to commit a relevant offence (see section 15 Sexual Offences Act 2003)
- Other 'grooming' behaviour giving rise to concerns of a broader child protection nature e.g. inappropriate text/ email messages or images, gifts, socialising etc
- Possession of indecent images/pseudo-images of children



#### CATEGORIES OF ABUSE

1. Physical
2. Sexual
3. Emotional
4. Neglect

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## Allegations against adults who work with vulnerable adults (people in positions of trust)

There may be occasions when allegations of abuse against vulnerable adults are raised.

Allegations against members of staff or volunteers working with vulnerable adults are managed in the same manner as allegations against adults working with children and young people. These processes are applicable in instances where there is an allegation or concern that a member of staff or volunteer has:

- Behaved in a way that has harmed or may have harmed an adult
- Possibly committed a criminal offence against or related to an adult
- Demonstrated behaviour in their personal life that might indicate unsuitability to work with adults



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117	Scope	>
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### RESOURCES



#### The Care Act (2014)

[www.legislation.gov.uk/ukpga/2014/23/contents/enacted](http://www.legislation.gov.uk/ukpga/2014/23/contents/enacted)

- **Surrey Safeguarding Adults Board**
- **Hammersmith and Fulham Safeguarding Adults Board**

# 18+

## 4. ORGANISED AND NON-RECENT ABUSE

The Police and LADO should be alerted to signs of organised or widespread abuse and/or the involvement of other perpetrators or institutions.

They should consider whether the matter should be dealt with in accordance with LSCB multiple perpetrator or organised abuse procedures.

Non-recent allegations should be responded to in the same way as contemporary concerns. It will be important to ascertain if the person is currently working with children and if that is the case, to consider whether the current employer should be informed.

### RESOURCES



#### Complex (Organised or Multiple) Abuse Procedure

[www.surreyscb.procedures.org.uk/hkpzo/procedures-for-specific-circumstances/complex-organised-or-multiple-abuse](http://www.surreyscb.procedures.org.uk/hkpzo/procedures-for-specific-circumstances/complex-organised-or-multiple-abuse)

Surrey Safeguarding Children Board Procedures Manual, Section 5.7

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## 5. ROLES AND RESPONSIBILITIES

# LSCB

LOCAL  
SAFEGUARDING  
CHILDREN  
BOARD

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### What is it?

A Local Safeguarding Children Board (LSCB) is a multi-agency body set up in every local authority. As well as the local authority, other organisations are represented on the LSCB.

The LSCB can also include representatives from other people or organisations in the community if their activities relate to children.

Each LSCB member organisation should identify a Named Senior Officer.

### Partner agencies

LSCB partner agencies (which includes Chelsea FC via the Safeguarding Hub) and all employers of adults who work with children should appoint:

- A senior manager to whom allegations or concerns should be reported. At Chelsea FC, this is the Head of Safeguarding.
- A deputy to whom reports should be made in the absence of the designated senior manager or where that person is the subject of the allegation or concern. At Chelsea this is the Safeguarding Manager.

### AN LSCB CAN INCLUDE:

- Police
- Health services
- Probation services
- Local youth offending team
- CAFCASS (Children and Family Courts Advisory and Support Service)

### INFO

#### Chelsea FC Named Senior Officer

Eva Bari  
Head of Safeguarding  
eva.bari@chelseafc.com

#### Responsibilities

- Ensuring that the organisation deals with allegations in accordance with these procedures
- Resolving any inter-agency issues
- Liaising with the LSCB on the subject

# LADO

LOCAL  
AUTHORITY  
DESIGNATED  
OFFICER

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## What is it?

Every Local Authority Children's Services has a Local Authority Designated Officer (LADO). There may be multiple LADOs within a local authority. Current guidance also refers to this role as Designated Officer (DO).

### The LADO/DO will:

- Receive reports about allegations and be involved in the management and oversight of individual cases
- Provide advice and guidance to employers and voluntary organisations
- Liaise with the Police and other agencies
- Monitor the progress of cases to ensure that they are dealt with as quickly as possible and are consistent with a thorough and fair process
- Provide advice and guidance to employers in relation to making referrals to the Disclosure and Barring Service (DBS) and regulatory bodies such as Ofsted, the GMC etc.

## THE ROLE OF THE POLICE

### The Police will:

- Have strategic oversight of the local Police arrangements for managing allegations against staff and volunteers
- Liaise with the LSCB on the issue
- Ensure compliance

### Each Police Public Protection Investigation Unit or Child Abuse Investigations Team (CAIT) has a Detective Inspector (or designated deputy) to:

- Liaise with the LADO
- Take part in strategy meetings/discussions
- Review the progress of cases in which there is a Police investigation
- Share information as appropriate, on completion of an investigation or related prosecution

## 6. GENERAL CONSIDERATIONS RELATING TO ALLEGATIONS AND CONCERNS OF ABUSE



### Persons to be notified:

- Chelsea FC must inform the **LADO** within one working day when an allegation or a concern of suitability is raised and prior to any further investigation taking place.
- **HR** will be notified and an officer appointed.
- There will be consideration as to whether or not to inform the parents or carers of the child or children as this may impede the disciplinary or investigation processes.
- In some circumstances the **parent/carers** may need to be told straight away for example if the child is injured and requires medical treatment.
- The parent/carers **and the child**, if sufficiently mature, should be helped to understand the processes involved and kept informed about the progress of the case and of the outcome where there is no criminal prosecution. This will include the outcome of any disciplinary process, but not the deliberations of, or the information used in, a hearing.
- Subject to restrictions on the information that can be shared, the employer should, as soon as possible, inform the **accused person** about the nature of the allegation, how enquiries will be conducted and the possible outcome (e.g. disciplinary action, and dismissal or referral to the DBS and/or regulatory body).

### HOW SHOULD YOU TREAT THE MEMBER OF STAFF?

#### They should:

- Be treated fairly and honestly and helped to understand the concerns expressed and processes involved
- Be kept informed of the progress and outcome of any investigation and the implications for any disciplinary or related process
- If suspended, be kept up to date about events in the workplace
- The FA and Premier league will be notified of all allegations or concerns about a member of staff
- CFC Safeguarding Board will be notified of any concerns or allegations against a member of staff so they can maintain board oversight

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## 7. CONFIDENTIALITY

Every effort should be made to maintain confidentiality and guard against publicity while an allegation is being investigated or considered.

Apart from keeping the child, parents and accused person up to date with progress of the case, information should be restricted to those who have a need to know in order to protect children, facilitate enquiries, manage related disciplinary or suitability processes.

Chelsea FC should not provide identifying information to the press or media, unless and until a person is charged, except in exceptional circumstances e.g. an appeal to trace a suspect. In such cases, the reasons should be documented and partner agencies consulted beforehand.

### Teachers and Educators

#### Guidance for Chelsea FC Academy

Parents and carers should also be made aware of the requirement to maintain confidentiality about any allegations made against teachers whilst investigations are ongoing as set out in section 141F of the Education Act 2002 (see paragraph 164). If parents or carers wish to apply to the court to have reporting restrictions removed, they should be advised to seek legal advice. The restrictions remain in place unless or until the teacher is charged with a criminal offence, though they may be dispensed with on the application to the Magistrates' Court by any person, if the court is satisfied that it is in the interests of justice to do so, having regard to the welfare of –

- The person who is the subject of the allegation, and
- The victim of the offence to which the allegation relates

There is a right of appeal to the Crown Court.

This restriction will apply to allegations made against any teacher who works at a school, including supply and peripatetic teachers. 'School' includes Academies, Free Schools, Independent Schools and all types of maintained schools.

The legislation imposing restrictions makes clear that "publication" of material that may lead to the identification of the teacher who is the subject of the allegation is prohibited. "Publication" includes "any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public". This means that a parent who, for example, published details of the allegation on a social networking site would be in breach of the reporting restrictions (if what was published could lead to the identification of the teacher by members of the public).

Parents and carers should also be made aware of the requirement to maintain confidentiality about any allegations made against teachers whilst investigations are ongoing

**Section 141F of the Education Act 2002**

### REPORTING RESTRICTIONS

The reporting restrictions cease to apply if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so, or if a judge lifts restrictions in response to a request to do so.

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## 8. SUPPORT

Chelsea FC, together with children's social care and/or the Police, where they are involved, should consider the impact on the child concerned and provide support as appropriate. Liaison between the agencies should take place in order to ensure that the child's needs are met.

As soon as possible after an allegation has been received the accused member of staff should be advised to contact their union or professional association. Human Resources should be consulted at the earliest opportunity in order that appropriate support can be provided via the organisation's occupational health or employee assistance arrangements.

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## 9. CLUB ACTION

### Club action during investigations

For information relating to Club action during safeguarding investigations, including suspension and resignation, contact Human Resources.

Where suspension is deemed appropriate, the reasons and justification should be recorded and the individual notified of the reasons.

If a suspended person is to return to work, Chelsea FC should consider what help and support might be appropriate e.g. a phased return to work and/or provision of a mentor. How best to manage the member of staff's contact with the child concerned must be considered in detail.

### SUSPENSION

**It should be considered in any case where:**

- There is cause to suspect a child has suffered, or is likely to suffer Significant Harm; or
- The allegation warrants investigation by the police; or
- The allegation is so serious that it might be grounds for dismissal

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## 10. WHISTLE-BLOWING

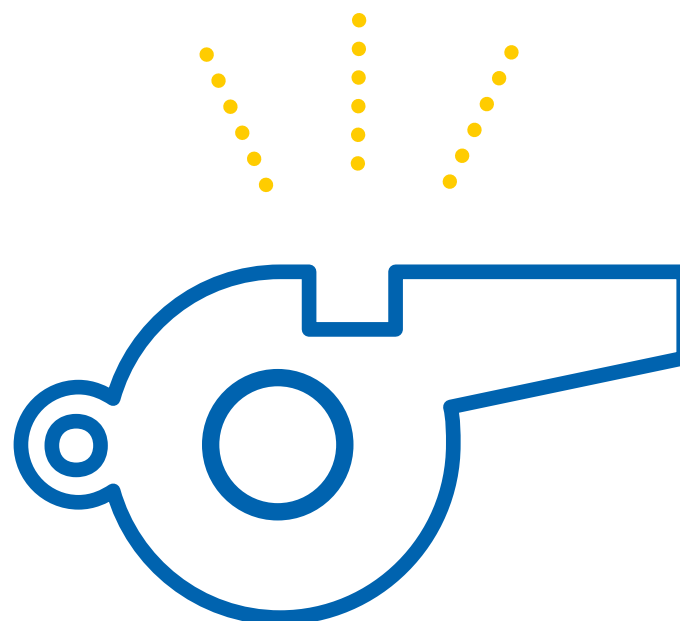
Chelsea FC has in place a whistle-blowing procedure which is a comprehensive guidance document for all staff at the club. This can be found on the Chelsea FC intranet.

All staff should be made aware of Chelsea's whistle-blowing policy and feel confident to voice concerns about the attitude or actions of colleagues.

### INFO

If a member of staff believes that a reported allegation or concern is not being dealt with appropriately by Chelsea, they should report the matter to their Local Authority Designated Officer (LADO).

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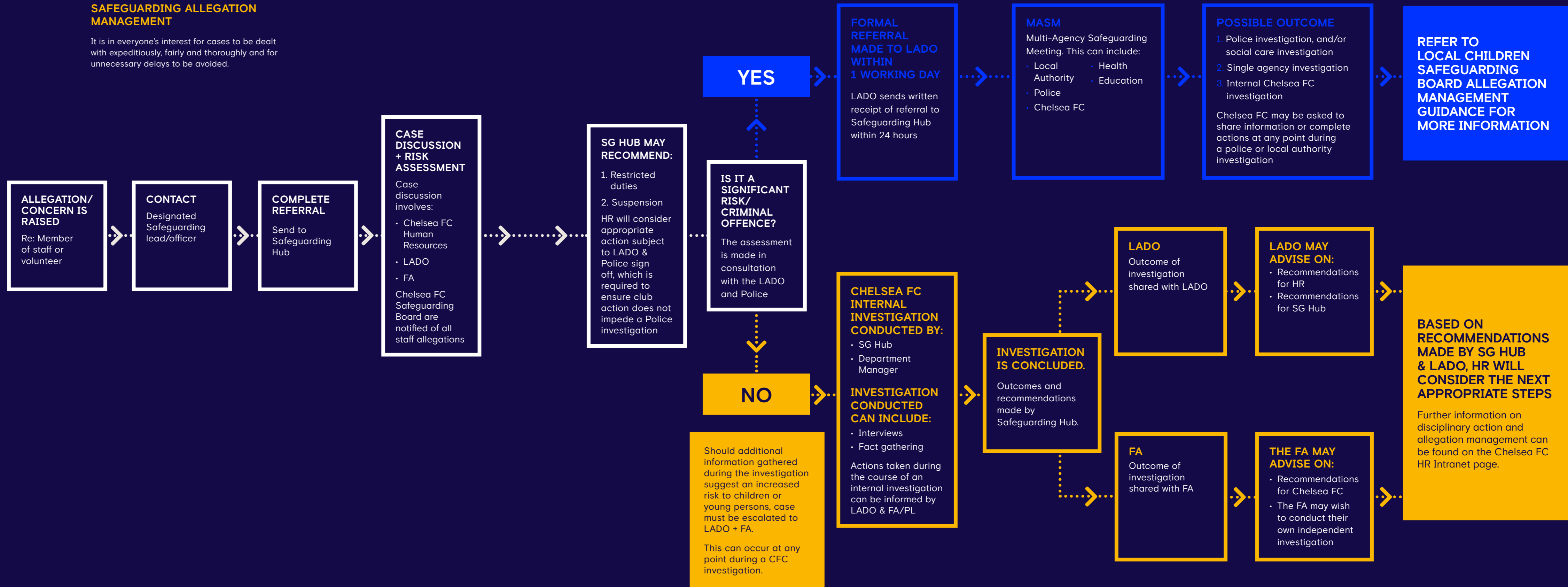


# 11. ALLEGATION MANAGEMENT PROCESS

## SAFEGUARDING ALLEGATION MANAGEMENT

It is in everyone's interest for cases to be dealt with expeditiously, fairly and thoroughly and for unnecessary delays to be avoided.

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## 12. INITIAL RESPONSE TO AN ALLEGATION OR CONCERN

An allegation against a member of staff may arise from a number of sources e.g. a report from a child, a concern raised by another adult in Chelsea FC, or a complaint by a parent or carer.



### Initial action by person receiving or identifying an allegation or concern:

The person to whom an allegation or concern is first reported should treat the matter seriously and keep an open mind.

#### They should not:

- Investigate or ask leading questions if seeking clarification.
- Make assumptions or offer alternative explanations.
- Promise confidentiality, but give assurance that the information will only be shared on a 'need to know' basis.

#### They should:

- Make a written record of the information where possible in the child/adult's own words including the time, date and place of incident(s), persons present and what was said (using forms provided by Chelsea FC Safeguarding Hub).
- Sign and date the written record.
- Immediately report the matter to their designated senior manager, or deputy in his/her absence (or where the senior manager is the subject of the allegation), This should then be referred to the Head of Safeguarding in line with Chelsea FC Managing Allegations Flow Chart.

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# B

## Initial Action by the Safeguarding Hub

When informed of a concern or allegation, the Head of Safeguarding or Safeguarding Manager will not investigate the matter or interview the member of staff, child concerned or potential witnesses.

### They will:

- Obtain written details of the concern/allegation, signed and dated by the person receiving (not the child/adult making the allegation).
- Approve and date the written details.
- Record any information about times, dates and location of incident(s) and names of any potential witnesses.
- Record discussions about the child and/or member of staff, any decisions made, and the reasons for those decisions.

They will then refer the allegation to the duty LADO within one working day. The FA and Premier League will also be copied into the referral. Referral will not be delayed in order to gather information. A failure to report an allegation or concern in accordance with procedures is a potential disciplinary matter.

If an allegation requires immediate attention, but is received outside normal office hours, the Head of Safeguarding should consult the Children's Services Emergency Duty Team or the local Police and inform the LADO as soon as possible.

The Safeguarding Hub will inform Chelsea FC Human Resources (HR) of any allegation against a member of staff. A HR Officer will then be appointed to the case and conduct any Club action and/or investigation required.

# C

## Initial Consideration by the Head of Safeguarding at Chelsea FC and the Local Authority

There are up to 3 strands in the consideration of an allegation:

1. A Police investigation of a possible criminal offence.
2. Children's Services enquiries and/or assessment about whether a child is in need of protection or services.
3. Consideration by Chelsea FC of disciplinary action.

The LADO and Head of Safeguarding will consider first whether further details are needed and whether there is evidence or information that establishes that the allegation is false or unfounded. Care should be taken to ensure that the child is not confused as to dates, times, locations or identity of the member of staff.

If the allegation is not demonstrably false and there is cause to suspect that a child is suffering or is likely to suffer Significant Harm, the LADO should refer to Children's Services and ask them to convene an immediate Strategy Meeting/Discussion.

The Police must be consulted about any case in which a criminal offence may have been committed. If the threshold for Significant Harm is not reached, but a police investigation might be needed, the LADO should immediately inform the police and convene an Initial Evaluation (similar to strategy meeting), to include the Police, employer and other agencies involved with the child.

References in this document to 'Strategy meetings/discussions' should be read to include 'Initial Evaluation meetings' where appropriate.

## 13. STRATEGY MEETING

Where possible, a strategy meeting (also referred to as strategy discussion or initial evaluation meeting) should take the form of a face to face meeting. However, on occasions, a telephone discussion may be justified.

Strategy Meetings are led by the **LADO**. A strategy meeting takes place when there is reason to believe that a child or children are suffering, or at risk of suffering significant harm. The Club's Safeguarding Hub will be represented & invited to attend. The Head of Safeguarding may require you, or your line management to provide information to share at the meeting.

Neither the subject of the allegation nor the alleged victim is present at this meeting.

A final strategy meeting is held.

### THE MEETING

The strategy meeting/discussion/evaluation meeting will take into account the following definitions when determining the outcome of allegation investigations:

- **Substantiated:** there is sufficient evidence to prove the allegation.
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.
- **False:** there is sufficient evidence to disprove the allegation.
- **Unsubstantiated:** this is not the same as a false allegation. It means that there is insufficient evidence to prove or disprove the allegation; the term therefore does not imply guilt or innocence.
- **Unfounded:** there is no evidence or proper basis which supports the allegation being made. It might also indicate that the person making the allegation misinterpreted the incident or was mistaken about what they saw. Alternatively they may not have been aware of all the circumstances. There was no evidence that a child/children had been harmed but there were concerns regarding performance/conduct and these should be addressed by the employer.



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## 14. ALLEGATIONS AGAINST STAFF IN THEIR PERSONAL LIVES

If an allegation or concern arises about a member of staff, outside of his/her work with children, and this may present a risk to children for whom the member of staff is responsible, the general principles outlined in these procedures will still apply.

If the risk is high and the person is assessed to pose an immediate risk to children, the LADO will make a decision to disclose the information to Chelsea FC. The individual concerned will be informed what information will be disclosed and the reasons for this.

In all other situations there will be consideration given as to what information should be disclosed to the employer. The LADO will contact the individual to inform them of the information they wish to disclose to Chelsea FC and seek to agree with the individual that they inform Chelsea FC in the first instance.

Should the individual disagree, a further discussion should be held between the LADO and the individual with a view to reaching an agreement. If it is not possible to reach agreement, the LADO will seek legal advice about whether or not to disclose without the individual's consent.

Having made the disclosure, a strategy meeting/discussion may be convened to assist the employer who will be expected to undertake a risk assessment to consider the implications of the information for the individual/employee.

If the member of staff lives in a different authority area to that which covers his/her workplace, liaison should take place between the relevant LADOs in both.

**In some cases, an allegation of abuse against someone closely associated with a member of staff (e.g. partner, member of the family, or other household member), may present a risk to children for whom the member of staff is responsible. In these circumstances a strategy meeting should be convened to consider:**

- The ability and/or willingness of the member of staff to adequately protect the child or children
- Whether measures need to be put in place to ensure their protection
- Whether the role of the member of staff is compromised

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## 15. SHARING INFORMATION

Wherever possible the Police and Children's Services should, during the course of their investigations and enquiries, obtain consent to provide the employer and/or regulatory body with statements and evidence for disciplinary purposes.

If the Police or CPS decide not to charge, or decide to administer a caution, or the person is acquitted, the police should pass all relevant information to Chelsea FC without delay.

If the person is convicted, the Police should inform Chelsea FC and the LADO straight away so that appropriate action can be taken.

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## 16. RECORD KEEPING

Employers should keep a clear and comprehensive summary of the case record on the individual's confidential personnel file and give a copy to the individual.

The record should include details of how the allegation was followed up and resolved, the decisions reached and the action taken. It should be kept at least until the person reaches retirement age or for 10 years if longer.

### Why do we need to keep a record?

The purpose of the record is to enable accurate information to be given in response to any future request for a reference if the person has moved on. It will provide clarification where a future DBS request reveals non convicted information, and will help to prevent unnecessary reinvestigation if an allegation surfaces after a period of time. In this sense, it may serve as a protector to the individual themselves, as well as in cases where substantiated allegations need to be known about to safeguard future children.

Details of allegations that are found to be malicious should be removed from personnel records. For education services, see the Department for Education: Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, 2018 for additional information.

### HOW LONG TO KEEP RECORDS

Records should be kept at least until the person reaches retirement age or for 10 years if longer.

10 YEARS

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## 17. MONITORING PROGRESS

The LADO should monitor and record the progress of each case, either fortnightly or monthly depending on its complexity. This could be by way of review Strategy/Evaluation Discussions or direct liaison with Police, Children's Services, and Chelsea FC, as appropriate. Where the target timescales cannot be met, the LADO should record the reasons.

The LADO should keep comprehensive records in order to ensure that each case is being dealt with expeditiously and that there are no undue delays. The records will also assist the LSCB to monitor and evaluate the effectiveness of the procedures for managing allegations and provide statistical information to the Department for Education as required.

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# 4

WEEKS

### TIMINGS

If a Police investigation is to be conducted, the Police should set a date for reviewing its progress and consulting the CPS about continuing or closing the investigation or charging the individual. Wherever possible, this should be no later than 4 weeks after the strategy meeting/discussion/evaluation meeting. Dates for further reviews should also be agreed, either fortnightly or monthly depending on the complexity of the investigation.



# 18. OUTCOMES

## (ALLEGATIONS OF ABUSE)

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### SCENARIO

# A

## Unsubstantiated and false allegations

Where it is concluded that there is insufficient evidence to substantiate an allegation, the Head of Safeguarding and HR Officer and/or Manager should consider what further action, if any, should be taken, based on the views expressed at the strategy/evaluation meeting.

**False allegations** made by children and young people are rare and may be a strong indicator of abuse elsewhere which requires further exploration. If an allegation is demonstrably false, the employer, in consultation with the LADO, should consider referring the matter to Children Services to determine whether the child is in need of services, or protection.

If it is established that an allegation was malicious, the Police should be asked to consider what action might be appropriate.

### SCENARIO

# B

## Substantiated allegations and referral to the DBS

The Disclosure and Barring Service (DBS) was established under the Protection Freedoms Act 2012 and merges the functions previously carried out by the Criminal Records Bureau (CRB) and Independent Safeguarding Authority (ISA). The relevant legislation is set out in Protection of Freedoms Act 2012.

There is a legal requirement for employers to make a referral to the DBS where they think that an individual has engaged in conduct that harmed (or is likely to harm) a child, or if a person otherwise poses a risk of harm to a child.

**The LADO should discuss with the employer whether a referral should be made to the Disclosure and Barring Service (DBS) in instances where:**

- an allegation is substantiated and the person is dismissed
- the employer ceases to use the person's services
- the person resigns or otherwise ceases to provide his/her services

If a referral is to be made it should be submitted in accordance with DBS guidance.

## RESOURCES

### Disclosure and Barring Service (DBS)

[gov.uk/guidance/making-barring-referrals-to-the-dbs#referrals-for-automatic-barring-offences](https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs#referrals-for-automatic-barring-offences)

### Protection of Freedoms Act 2012

[legislation.gov.uk/ukpga/2012/9/contents/enacted](https://www.legislation.gov.uk/ukpga/2012/9/contents/enacted)

### Surrey Safeguarding Children Board Procedures Manual

Section 3.2, point 22



## 19. REFERRING TO DBS

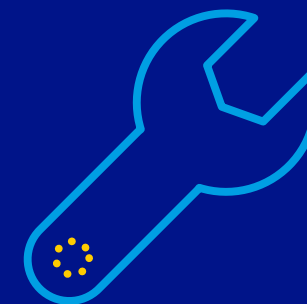
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Chelsea FC has a legal duty to refer to Disclose Barring Service (DBS) where appropriate. Referrals are made to the DBS when an employer or organisation has dismissed or permanently removed an individual from regulated activity, either because that person has caused harm to children or vulnerable adults, or poses a future risk of harm.

Referrals are made to enable the DBS to consider whether an individual needs to be added to a barred list(s). This prevents the individual from working with children, young people and vulnerable adults.

The duty to refer applies irrespective of whether another body has made a referral to the DBS in relation to the same person. This helps to make sure the DBS have all the relevant information to consider a case. DBS can then make a fair, consistent and thorough decision about whether to bar a person from working with vulnerable groups.

When Chelsea FC is considering exercising the power or legal duty to refer, it should ensure that the referral is compliant with the Data Protection Act 1998 and Human Rights legislation. In order to refer an individual, certain conditions must be met. In the event of referring to DBS, Chelsea FC will seek legal advice.



**SEE THE DBS REFERRAL GUIDANCE AND TOOLS**

[www.gov.uk/guidance/making-barring-referrals-to-the-dbs#referrals-for-automatic-barring-offences](https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs#referrals-for-automatic-barring-offences)

## 20. DEBRIEF

At the conclusion of a case, Chelsea FC will review the circumstances of the case to determine whether there are any improvements to be made to the organisation's procedures or practice to help prevent similar events in the future. This will include issues arising from any decision to suspend a member of staff.

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## FOR MORE INFORMATION

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**Nancy Nicholas**

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**Safeguarding Coordinator**  
**George Richardson**

Email: [George.Richardson@chelseafc.com](mailto:George.Richardson@chelseafc.com)

**Cobham**  
**Surrey Children's Services**

Phone: 0300 470 9100

Emergency duty team (Out of hours): 01483 517898

Email: [csmash@surreycc.gov.uk](mailto:csmash@surreycc.gov.uk)

Secure email: [csmash@surreycc.gcsx.gov.uk](mailto:csmash@surreycc.gcsx.gov.uk)

LADO: 0300 123 1650

Email: [LADO@surreycc.gov.uk](mailto:LADO@surreycc.gov.uk)

**Stamford Bridge**  
**Hammersmith and Fulham Children's Services**

Initial contact and advice team (ICAT): 020 8753

6610 Phone: 020 8753 6600

Emergency duty team (Out of hours): 020 8748 8588

Email: [familyservices@lbhf.gov.uk](mailto:familyservices@lbhf.gov.uk)

LADO: 020 8753 5125

Email: [LADO@lbhf.gov.uk](mailto:LADO@lbhf.gov.uk)

Out of hours - 020 8748 8588

**SAFEGUARDING IS**  
**EVERYONE'S RESPONSIBILITY**

Safeguarding Hub: [safeguarding@chelseafc.com](mailto:safeguarding@chelseafc.com)

