CHILDREN AND YOUNG PEOPLE SAFEGUARDING POLICY

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5. The Fifth part of this policy gives an overview of practise and standards relating to different areas of the business and staff should seek further information and policies relating to their area of work.

DEFINITIONS

- 'Child' includes everyone under the age of 18.
- Safeguarding refers to the actions we take to ensure all children are safe from harm when involved in our clubs and activities.
- Child Protection is a set of activities that are required for specific children who are at risk/or are suffering from significant harm.
- Abuse refers to the acts of commission or omission that led to a child experiencing harm.
- Harm refers to the negative impact or consequences upon the child of those actions.
- Violence refers to "all forms of physical or mental violence, injury and abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse." Article 19 UN Convention on the Rights of the Child

Safeguarding Policy Statement

At Wolves we want our children and young people to be happy and safe. We strive to ensure that children and young people are treated with respect, we are committed to hearing their voices and we want to create a positive environment that is supportive, warm, and welcoming. Through the application of this policy and a commitment to best practice we pride ourselves that safeguarding runs prominently and proudly throughout our pack. All colleagues and volunteers have a responsibility to ensure the safety and welfare of children and young people, including taking appropriate steps (including those set out in this policy) to ensure that suspicions and allegations of abuse and poor practice are taken seriously and reported immediately and appropriately.

WHAT IS SAFEGUARDING?

Safeguarding is the action that is taken to promote the welfare of children and protect them from harm.

Safeguarding means:

- Protecting children from abuse and maltreatment.
- Preventing harm to children's health or development.
- Ensuring children grow up with the provision of safe and effective care.
- Acting to ensure all children and young people to have the best outcomes.

Our Policies are driven by a commitment to children rights, and we believe that children and young people should never experience abuse of any kind.

Trauma Informed Practise

We are striving to become a trauma-informed workforce.
We recognise that trauma often affects the way people approach relationships. This is because based on our experiences we may feel unsafe, lack trust, or live with anxiety. Becoming trauma-informed is about supporting people to feel safe enough in their interactions with services to build trust, and to help people overcome any barriers to an effective helping relationship. An increased human centric approach aims to raise awareness of relevant psychological theory behind mental health and the benefits of relationship-based practice. It explores the potential impacts of trauma and adversity across a person's entire life and promotes professional practices, activities, attitudes, and behaviours that take on a trauma informed approach. We are working to embed this across the workforce to enhance our safeguarding approach.

Remember:

Safeguarding is everyone's business.

If you are ever in doubt, you should always contact a member of the safeguarding team for support and guidance. It is always better to report a concern which later turns out to be unfounded than to not report a concern.
Listen to your 'nagging voice'.

SAFEGUARDING FRAMEWORK

This document will share what we believe to be our standards for best practice and evidence our safeguarding commitment to protecting children and young people who we work with, work alongside and are in contact with.

The aims of this policy are to:

- Drive a proactive culture to keep children, young people safe.
- Promote and develop the highest possible standards in safeguarding.
- Establish effective safeguarding measures to create safe, fair, and inclusive environments for all.
- Demonstrate our commitment to safeguarding and outline the expectations of our staff.
- Outline appropriate behaviour and suitable professional boundaries.
- Ensure that everyone understands their roles and responsibilities in relation to safeguarding and they are provided with appropriate learning and development opportunities.
- Ensure we have an effective safer recruitment framework in place to assess the suitability of staff whether full time or casual, consultants, volunteers, and anyone else representing the club.
- Ensure staff understand their responsibilities to take appropriate action in relation to any concerns, allegations, incidents of harm, exploitation, poor practice, or abuse.
- Provide an effective framework to report any concerns.

Guiding Principles

- Children, young people have the right to protection from incidents of harm, exploitation, poor practice, abuse, mistreatment, and exploitation in any form. This is regardless of age, ability or disability, gender reassignment, race, religion or belief, sex or sexual orientation, or socioeconomic background.
- Safeguarding is the collective responsibility of everyone connected with the club and we continually strive to create an environment where everyone is empowered to protect themselves and others.
- The club is committed to address any additional vulnerability or extra barriers that children, young people, or Adults at Risk may face (for example those in care, those with specific mental health issues or other disabilities).
- We also recognise that talented and elite football players may be additionally vulnerable.
- We will always adopt a person-centred approach and put anyone at risk at the heart of our decision-making processes.
- We strive to be trauma informed.
- The safety and welfare of everyone must always be our priority in making any decision.
- We must always consider the best interests and ongoing needs of any child, young person, or adult at risk.
- It is important that we recognise an individual's rights to participate in the decisions about themselves wherever possible. We will continue to ensure that children's rights are upheld in line with UNCRC.
- We continue to work collaboratively and in partnership with parents, carers and all relevant statutory agencies and other external stakeholders.
- We strive to communicate openly and transparently and create best practice approaches; we encourage challenge if it helps us to improve the development of our safeguarding framework. When appropriate we will report to the Disclosure and Barring Service (DBS) anybody delivering a Regulated Activity for the club who is believed by us to present a risk of harm to a child, young person, or adult at risk.
- Where the club 'withdraws permission' for a person to deliver a Regulated Activity they will also be reported to the DBS without exception.
- We will refer both Premier League and The FA when appropriate. We ensure that our staff are role models of good behaviour have appropriate supervision and training in place to support them.
- We recruit staff (including, for the purposes of this policy, casual workers, agency staff, consultants, volunteers, and researchers) in line with our robust safer recruitment practices and individuals are only employed after the completion of all necessary checks and referencing.
- All suspicions or allegations of abuse will be taken seriously and responded to efficiently, fairly, and appropriately.

Any necessary referral or sharing of information will always be completed promptly and without undue delay.

Anti-oppressive practice and equality

We are committed to actively challenging discrimination and oppression in all forms. This includes racism, sexism, homophobia, transphobia, ableism, religious discrimination, and discrimination linked to socioeconomic status.

We recognise that some children and families may experience additional barriers to being heard or protected. We will:

- Actively listen to and amplify all voices, especially those less likely to be heard
- Reflect on and challenge bias in decision-making
- Ensure safeguarding responses are fair, culturally sensitive, and inclusive
- Challenge discriminatory language or behaviour immediately

Safeguarding practice at Wolves must be anti-discriminatory, anti-racist and rooted in equity.

Roles and Responsibilities

We believe that children and young people have the right to take part in sport or be involved any engagement with Wolves FC in an environment which is safe and free from any risk of abuse.

- The Head of Safeguarding - is accountable for safeguarding provision across the Club which will include the development and nurturing of a safeguarding approach which is embedded in effectively across the club. The Head of Safeguarding champions safeguarding at all areas of club activity and works collaboratively with all stakeholders to ensure safeguarding practice is good throughout the organisation.
- Safeguarding Manager and Lead Designated Safeguarding Staff - are responsible for ensuring that all frontline staff are adequately trained and abled to carry out their safeguarding roles and will provide advice and guidance to staff through various means of the club's communication networks.
- Heads of Department and Senior Staff - have specific responsibilities for safeguarding policy, procedures and appropriate systems are given to management and those involved in the recruitment, selection, and training of staff. Heads of Department and their managers are responsible for ensuring they comply with safeguarding, safer recruitment, and safe working practices in their day-to-day operation within their departments and projects.
- All Staff - have a responsibility to provide a safe environment for children and identify children who may need extra help or who are suffering, or are likely to suffer, significant harm.
- All Staff - have a responsibility to take appropriate action and report concerns
- All Staff - should respect and abide the Club's Code of Conduct.
- All Staff - members should work with the Designated Safeguarding
- Leads and the Head of Safeguarding, to deal with concerns.

Lisa Carter - Head of Safeguarding

Jon Redhead - Safeguarding Senior Manager, Academy Designated Safeguarding Lead

Stephen Cullis - Safeguarding Senior Manager, Foundation Designated Safeguarding Lead

Erica Holford - Safeguarding & Player Care Women & Girls (Academy)

'We believe in being responsive to safeguarding updates in line with current local and national safeguarding trends and priorities and believe a flexible approach creates proactive practice.'

Lisa Carter,
Head of Safeguarding

RECOGNISING CHILD ABUSE

To ensure that children are protected from harm, staff need to understand what types of behaviour constitute abuse and neglect. Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone, or leaving knives or matches within reach of an unattended toddler. Abuse may be committed by adult men or women and by other children and young people.

Child welfare concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. Children may be abused in a family, in an institutional or community setting, by those known to them or by a stranger, including, via the internet. Abuse and neglect can happen over a period but can also be a one-off event. Child abuse commonly occurs within relationships of trust or responsibility (including parents/carers) and is always an abuse of power/position/authority or a breach of trust.

The warning signs and symptoms of child abuse and neglect can vary from child to child. Disabled children may be especially vulnerable to abuse because they may have an impaired capacity to resist or avoid abuse. They may have speech, language and communication needs which may make it difficult to tell others what is happening. Children also develop and mature at different rates so, what appears to be worrying for a younger child might be normal behaviour for an older child. Parental behaviours may also indicate child abuse or neglect. This could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.

Facts:

Children living away from home are vulnerable to abuse. Children are also abused by other young people and, on occasion, by young children. Abuse can happen to a child regardless of their age, gender, race, ability, or class.

Adults have an important and vital role to play in looking out for the possible signs, including a sudden and noticeable change of behaviour.

It is important to remember that abuse happens and a culture of taking it seriously and maintaining an attitude of "it could happen here" will help develop an approach of vigilance.

RECOGNISING CHILD ABUSE

Warning Indicators

A noticeable change in the child's or young person's behaviour or appearance is an indicator. Recognising abuse may be a cluster of symptoms or repeating patterns.

Here are a few example signs that would raise concern:

- Notable changes in behaviour or character, such as aggression or withdrawal.
- Severe/unexplained bruising or burn marks or scalds.
- Inadequate or inappropriate clothing for child's size, weather, or time of year.
- Sleeping disorders or bed wetting in children aged 9+ through to teens.
- Reluctance to remove clothing for activities: arms and legs covered to hide bruises/marks.
- Persistently dirty with body odour / smearing.
- Inappropriate sexualised behaviour or words for the age of child (e.g "You're so fit Sir/Miss).
- Drawings/doodling of sexually explicit conduct– where it is traced over heavily.
- Self-harming (around hidden areas such as back of legs, arms) and eating disorders.
- Children who talk about running away.
- Children who drink alcohol regularly from an early age.
- Children who are concerned for younger siblings without explaining why.
- Parents who are dismissive and non-responsive to practitioners' concerns.
- Parents who collect their children from school when drunk, or under the influence of drugs.
- Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. Concerns should be viewed as part of a jigsaw, and each small piece of information will help the designated safeguarding lead and Head of Safeguarding an to decide how to proceed.

Types of Abuse

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.

Physical abuse: A form of abuse which may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse: The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. - It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.

It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. - It may feature age or developmentally inappropriate expectations being imposed on children.

These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. - It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether the child is aware of what is happening. - The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. - They may also include non-contact activities, such as involving children in looking at (or in the production of) sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect: The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: - provide adequate food, clothing, and shelter (including exclusion from home or abandonment); - protect a child from physical and emotional harm or danger; - ensure adequate supervision (including the use of inadequate caregivers); or - ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Bullying: Bullying is "the repetitive, intentional hurting of one person or group by another person or group, where the relationship involves an imbalance of power." The Anti-Bullying Alliance. This definition includes cyber-bullying. Bullying can physical, verbal, or psychological. It can happen face to face or through cyberspace (cyberbullying). - Children are vulnerable to abuse by their peers. Bullying can and does occur anywhere there is inadequate supervision. The Club has an Anti-Bullying policy. All activities with children are covered by the Club's Antibullying policy.
- Incidents of cyber-bullying should be brought to the attention of staff or a senior manager and the messages retained as evidence. Although most 'low level' incidents will be dealt with at the time by coaches/staff, all will be recorded and reported to the next level of management to determine whether further action should be taken and recorded using MyConcern.

Identifying Vulnerable Children

Under 5s (especially babies under 18 months), Children in care and children with Special Education Needs or Disability (SEND) can face additional safeguarding challenges and are more vulnerable to abuse (including bullying) and exploitation. Risk of abuse or exploitation is increased if a child experiences poverty, mental health issues, substance abuse, homelessness, political instability, and social exclusion. Other high-risk factors that may make a child more vulnerable is when there is compromised parenting: when a parent's capacity to safeguard and appropriately care for their child(ren) is limited: Substance misuse, domestic violence and parental mental ill health pose significant risks factors for children and it is the combination of these factors which is particularly toxic. Other factors that raise a concern with children are: - related issues: sexually harmful behaviour, spirit possession/witchcraft. - special circumstances: gangs, honour-based violence, young carers, truants (frequent school absences), missing from care or home, violent extremism, Vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability, or sexuality.

Children in Care

We may be regularly working with children in care, we may not always know that a child is in care. However, we should make sure we refer to parents/and or carers and listen to what children tell us. If we believe a child, we are regularly working with is in care or we will need to ensure we have appropriate information recorded including the level of authority delegated to the carer by the local authority looking after the child. It may be appropriate to inform the local authority that we are working regularly with a child or young person in care and to make a note of the social workers contact details.

Children with Caring Responsibilities (Young Carers)

We recognise that some children and young people may undertake caring responsibilities for a parent, sibling, family member or other adult with care and support needs. Whilst caring can be a positive experience, it may become inappropriate where it:

Impacts the child's health, wellbeing, development or education.
Exposes the child to harm, neglect, emotional distress, domestic abuse or other safeguarding risks.
Requires the child to undertake responsibilities that are not appropriate to their age, maturity or capability.

In these circumstances, safeguarding concerns may exist for both the child and the adult with care and support needs.

Remember:

The Wolves badge is powerful and influential.

Remember children and young people look up to you.

Staff should:

Recognise and respond to signs that a child may be undertaking inappropriate or excessive caring responsibilities.
Consider whether the child requires additional support, assessment or referral to Children's Services.
Where appropriate, consider safeguarding concerns relating to the adult alongside concerns for the child.
Work in partnership with relevant agencies, parents, carers and safeguarding professionals to reduce risk and ensure the child is not placed at continued risk of harm.
Record concerns and seek advice from the Safeguarding Team in line with this policy.

Remember: No child should be expected to undertake caring responsibilities that have a detrimental impact on their safety, wellbeing, development or life opportunities.

PRACTISE

Positive practise

- Be a role model, displaying consistently high standards of behaviour and appearance (disciplined/committed/time keeping).
- Use language that is child appropriate and socially acceptable. Work in an open environment. You should avoid unnecessary private situations and discourage secrets and/or closed communications.
- Make the experience of the sporting activity fun and enjoyable for all involved. In doing this, you should promote fairness and confront and manage any bullying.
- Be aware of Wolves Anti Bullying Policy and ensure that children and young people know how to raise concerns or worries.
- Treat all children and young people equally and with respect and dignity. Put the welfare of the child or young person first.
- Avoid unnecessary physical contact and maintain a safe and appropriate distance with children and young people.
- Physical contact must not be intrusive, and the child or young person's consent must be obtained prior to the contact. It should be provided in an open environment to protect yourself and the child or young person.
- Where supervising groups of children or young people in changing rooms, always ensure staff members work in pairs.
- Written parental consent is required if club officials are required to transport children and young people or for any significant travel arrangements e.g., tours/overnight stays.
- There must always be a qualified first aider present or readily available.
- Whilst at away events, adults should not unnecessarily enter a child or young person's room and they should never invite children or young people into their own room.
- When providing feedback to children and young people, make sure it is constructive and encouraging as opposed to negative criticism.
- Where the club acts in loco parentis, secure written consent from parents and guardians for the administration of emergency medical treatment and first aid. Ensure that a written record is kept of any incidents or injuries that occur. This record should include details of the incident, any action taken, and any treatment given.
- Ensure all communication with persons under 18 is conducted with parental consent. Any text messages or social media contact with children or young people must be for the sole purpose of facilitating arrangements and should always be made using the business mobile telephone provided. It is better practice to jointly communicate with the parent or guardian and child.

Poor practise

This takes place whenever colleagues or volunteers fail to fulfil the highest standards of care and support in their working practice. Poor practice which is allowed to continue can cause harm and can become abuse. Poor practice is unacceptable and will be treated seriously with appropriate action, including (where appropriate) disciplinary action.

It is important to recognise and be self-aware of your own practice if you feel you are 'drifting' towards poor practice. Seek training, raise with your manager, and ask for support. Be mindful of colleague's behaviour and make it your responsibility to 'call out' any practice which displays any of the following behaviours. You have a responsibility to report your concerns.

Poor practise might look like:

- Taking insufficient care to avoid injuries. For example, by excessive training or inappropriate training for the age, maturity, experience, and ability of players.
- Allowing abusive or concerning practices, allegations, or disclosures to go unreported or not acted upon. If you have reported the matter to the relevant person within the club and it has not been dealt with correctly, consult the procedures in this document.
- Spending unnecessary amounts of time alone with children and young people away from others. Being alone in changing rooms, toilet facilities or showers used by children and young people.
- Take a child or young person alone in a car unless consent has been obtained by a safeguarding designated lead or Head of Safeguarding OR you believe it to be an emergency.
- Taking children or young people to your home or any location where they will be alone with you. Sharing a room with a child or young person if at an overnight stay or tour.
- Engaging in rough, physical, or sexually provocative games of any type, even those which you may consider to be simply 'horseplay' or 'banter'. This is never appropriate and should be avoided.
- Encouraging, allow or engage in inappropriate touching of any form.
- Placing children in potentially compromising and uncomfortable situations with adults (e.g., inappropriate use by a coach/ staff member of social media with a young player).
- Allowing children or young people to use inappropriate language or action without being challenged or corrected.
- Making sexually suggestive comments to a child or young person.
- Doing things of a personal nature that the child or young person can do for themselves.
- Ignoring health and safety guidelines as this will subject children to unnecessary risks. (e.g., allowing young players to set up goalposts unsupervised by adults).
- Giving continued and unnecessary preferential treatment to individuals.

Please note that both lists are not exhaustive but merely providing examples of the types of behaviour you should promote or challenge and avoid

LOW LEVEL CONCERNS ABOUT COLLEAGUES

We want to create and embed a culture of openness, trust, and transparency in which the clear values and expected behaviour are set out. This is in line with the "Premier League Safer Working Practice Guidance" and "Keeping Children Safe in Education".

Definition of a low-level concern

A low-level concern is any concern, no matter how small, even if no more than causing a sense of unease or a 'nagging doubt', that a person working in or on behalf of Wolves FC may have acted in a way that:

- is inconsistent with the "Premier League Safer Working Practice Guidance", and the Safeguarding Children and Young People Policy including inappropriate conduct outside of work, and
- does not meet the allegations threshold or is otherwise not considered of severity to make a referral to the LADO but may meet the thresholds as defined by The FA Safeguarding Concerns in the Professional Game, Referral & Threshold Document.

Examples of behaviour that could require reporting of a low-level concern include, but are not limited to:

being over friendly with children
- having favourites
- taking photographs of children on their personal mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating, or offensive language.

Such behaviour can exist on a wide spectrum; from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, however, in specific circumstances may not be, through to that which is ultimately intended to enable abuse. It is crucial that any such concerns, including those which do not meet the harm threshold, are shared responsibly and with the Head of Safeguarding/HR/Safeguarding Leads. Sharing concerns responsibly means they are dealt with sensitively and we will support those individuals who have low-level concerns raised against them and potential false allegations or misunderstandings. Any suspicions or concerns relating to poor practice must be reported immediately to the Designated Safeguarding Officer or the Department Manager however if a member of staff believes that this route has been ineffective, they can contact Head of Safeguarding, Head of Department, Director of HR, or the NSPCC Helpline. Staff can also follow Wolves FC whistleblowing procedures.

If the concern warrants more information (fact finding) this will be completed by the Designated Safeguarding Officer, who will consult with the Department Manager. The Head of Safeguarding must be made aware of the outcome including the case management documentation being sent for referencing to HR and disciplinary procedures may be initiated. Wolves FC Club will send a referral to The FA Safeguarding Team where repeated poor practice incidents occur. Specifically, a referral will be made where there are three incidents of poor practice by the same individual. This is whether these incidents are for the same type of poor practice, or for different forms of poor practice.

Position of Trust

The "position of trust" offences is intended to target situations where the child has some dependency on the adult involved, often combined with an element of vulnerability of the child. This means that those in relationships of trust should not:

- Use their position to gain access to information relating to person that the individual is in a position of trust or authority over, and most certainly not an u18. for their own or others' advantage. Such information should only be used or shared to meet the needs of the children or adult at risk.
- Use their power to intimidate, threaten, coerce, or undermine a child or adult at risk.
- Use their status and standing to form or promote inappropriate relationships; professional boundaries must be always maintained.

This means that any sexual activity between a member of staff in a position of authority and trust and a child under 18 on a Club activity may be a criminal offence, even if that child is over the age of consent.

Self-Referral

When colleagues and volunteers identify their own poor practice or practice which could be questioned as to their integrity, they have a duty to self-refer themselves to their manager, HR, or the Safeguarding Team.

For positive engagement with vulnerable groups, professional boundaries must always be maintained, to ensure these professional standards are upheld. It is important that colleagues and volunteers self-refer when vulnerable groups are forming an over familiar attachment with them, as discussed in the Premier League Guidance for Safer Working Practice. In addition, and in accordance with the Policy for the Management of Criminal Records, colleagues and volunteers are required, regardless of their role, to notify HR of anything that affects, or might affect, their suitability to work at the Company, including any reprimands, warnings, cautions, convictions, enquiries/investigations by a statutory agency. This also extends to those working with children and/ or adults at risk having children in their charge taken into care proceedings. At this stage the Safeguarding Team with HR will risk assess what steps need to be taken including a completion of a new criminal records check, investigating and engaging with statutory services as examples.

SUPPORTING CHILDREN AND YOUNG PEOPLE

Children are encouraged to conduct themselves and behave in a responsible manner and we regularly discuss and co-produce codes of conduct specifically for certain age groups. We remind children, young people, parents, and carers who they can talk to if they are worried or concerned about any staff behaviour or other children's behaviour. We embed safeguarding into regular newsletters across the club, on our website, in all inductions and new projects. Wolves FC participates in safeguarding campaigns such as Anti-Bullying Week, Safer Internet Day and hosts its own 'safeguarding week' each season. We have a children's parliament within our Academy and are in the process of developing other opportunities for children and young people to influence practice, protocols, and policy. We are currently working in partnership with UNICEF to strengthen children's voices. We will make use of partner relationships and we will actively promote an ethos of respect for children and young people.

Listening to children when they want to talk

When you work regularly with children, young people and adults at risk safeguarding issues and concerns can be daily. Dealing proactively and confidently is part of the role and expected. However, a child protection issue can be more complex and as well as devastating for the child can also result in distress and anxiety for staff who become involved. Children very rarely (if at all) use the word 'disclose' this is an adult term. It is more likely a child will approach you and tell you something informally. Children may tell you part of the story and another member of staff the other half of the story. This is why we record low level observations and concerns using MyConcern.

A child tells you they are experiencing abuse

If a child starts to tell you something that is worrying them then remember they have chosen, you. They feel you are a trusted adult, and they want you to help. Sometimes a child may say 'can I tell you a secret or please don't tell anyone' – explain that you will need to tell someone from the safeguarding team, but you will not make decisions behind their back or without trying our very best to speak to them first. Staff are not allowed to keep secrets.

How to respond

- Listen and/or closely observe their presentation and behaviour
- Do not interview, investigate, or ask leading questions.
- Let them know that you will need to tell someone else to help them.
- Do not promise to keep what they tell you secret.
- Do not speak with the alleged person or parents/carers of the child.
- Respond appropriately: make notes and discuss with your line manager.
- Report your concerns: Contact your Designated Safeguarding Officer or the Head of Safeguarding.
- Record your observations using MyConcern
- Keep your own personal notes in case of criminal investigation.

IMPORTANT: If a child starts telling you something but does not continue when he/ she is told that it cannot remain confidential, this needs to be raised as a concern.

Children and young people Low Level Recording

We use MyConcern to record safeguarding concerns however we can also use to make a note and report low level observations and low-level concerns. By capturing issues, we can build a picture that is helpful in how we engage with and/or support children, young people, and adults at risk.

All staff with our Foundation and Academy should have MyConcern access. We are transitioning during 22/23 season to ensure all staff have access and are confident to use.

Reporting concerns about a child

There will be occasions when staff may suspect that a child may be at risk of harm. The child's behaviour may have changed and be out of character, they may write stories or draw images that reveal confusion or distress, or physical but inconclusive signs may have been noticed.

In these circumstances, staff should give the child the opportunity to talk. The signs they have noticed may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill, or an accident has occurred. Following an initial conversation with the child, if the member of staff remains concerned, they should discuss their concerns with their manager, designated safeguarding officer or Head of Safeguarding.

It is fine for you to ask a child or young person if they are OK or if you can help in any way. Remember any child could become a victim of abuse.

Staff should record these early concerns using MyConcern.

If a child/young person does begin to reveal that they are being harmed, staff should follow the advice below

Key points for staff to remember for acting is:

- Discuss your concern with your line manager and report it your Designated Safeguarding Officer or the Head of Safeguarding– follow the procedure for your activity.
- In an emergency take the action necessary to help the child, if necessary, call 999 or 101 for local police.
- Do not start your own investigation
- Share information on a need-to-know basis only – do not discuss with colleagues, friends, or family Make a record and upload to MyConcern
- Seek support for yourself if you are distressed.

If the child needs immediate medical attention:

- Call for an ambulance.
- Inform parents you are doing this.

If parents are allegedly involved in the abuse, only inform them that you are taking the child to hospital. Do not share any other information. Inform doctor of your concerns in relation to child protection issues. The doctor will take appropriate action. Inform your manager and report your concerns.

Reporting procedure for activities in schools (or other organisations)

When delivering activities in a school or other organisation or directly under the supervision/ management of school/organisation staff, the school's/organisation's arrangements for child protection will apply: - You must inform the designated teacher or person for that school/organisation, who will follow the Local Safeguarding Children Board (LSCB) procedures. - You should then inform your Safeguarding Officer or the Head of Safeguarding. When delivering activities in partnership with a school, but on Club premises or out of school hours and without supervision from the school/organisation, follow the Club's procedures.

Notifying parents

The Club will normally seek to discuss any concerns about a child with their parents. This must be handled sensitively, and the Head of Safeguarding will contact the parent in the event of a concern, suspicion, or disclosure. However, if the Club believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care.

Referral to children's social care

The Head of Safeguarding/Designated safeguarding Lead will make a referral to children's social care if it is believed that a child is suffering or is at risk of suffering significant harm. The child (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

Any member of staff may make a direct referral to children's social care if they genuinely believe independent action is necessary to protect a child.

Preserving Evidence

In situations of possible physical or sexual assault:

- In physical abuse cases, where a child, young person or Adult at Risk wishes to show you an injury, only observe what they consent to show you and only ever observe what is appropriate Do not touch what you do not have to. Wherever possible leave things as they
- are. Do not clean up, do not wash anything or in any way remove fibres, blood etc. If you do have to handle anything at the scene keep this to a minimum
- Do not touch any weapons unless they are handed directly to you. If this happens, keep handling to a minimum
- Place the items into a clean dry place to hand to the police
- Preserve anything that was used to comfort the victim, for example a blanket etc as this could have fibres or other evidence transferred to it
- Secure the room. Do not allow anyone to enter unless strictly necessary to support you or the victim until the Police arrive

Prior to the arrival of the Police and medical examination:

- Ensure that no one has physical contact with the abused or any alleged perpetrator as cross contamination could destroy evidence
- Encourage the victim not to shower
- Encourage the victim not to change their clothing
- Even when the victim says they do not want police involvement, preserve items anyway as they may change their mind later or you may be legally obliged to inform the Police Encourage the victim not to eat or drink if there is a possibility
- that evidence may be obtained from the mouth

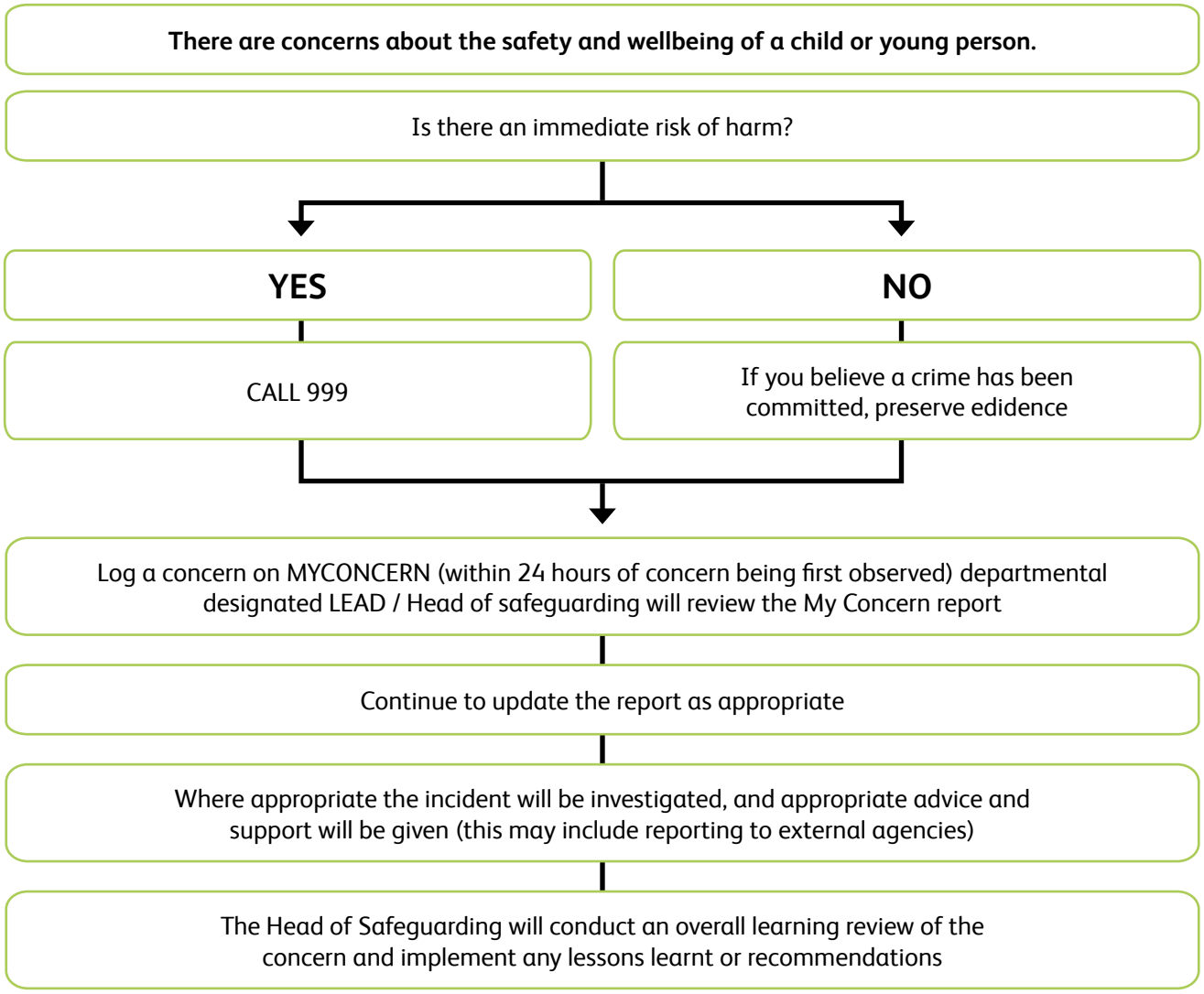
REPORTING FLOWCHART

Raising a Safeguarding Concern

No one should ever assume that someone else will help a child OR young person. It is not the responsibility of anyone at the Club to decide whether abuse has taken place.

However, everyone does have a responsibility to act on any concerns that are reported or witnessed. We ask everyone to remember that safeguarding is everyone's responsibility.

All Staff will be fully supported and protected if they make any report in good faith about a concern. If you have a concern you should follow the following procedure.



Taking no action is never an option if you have legitimate concerns.

CONCERNS ABOUT ALLEGED ABUSE BY STAFF

- Any suspicion or concern that a child has been abused or is at risk of abuse must be reported immediately
- to the Head of Safeguarding/Safeguarding Manager and/or designated safeguarding lead.
- The Safeguarding Team will take necessary steps to ensure the safety of the child and any other individuals who may be at risk.
- Colleagues and volunteers must not carry out their own investigations.
- The Safeguarding Team will assess the information disclosed and take appropriate action. The Safeguarding Team will, together with other appropriate senior colleagues (where appropriate), assess whether the suspicions or concerns should be referred to the Local Authority and/ or the police. Throughout the process clear records of decision making will be documented.
- The parents or carers of the alleged victim and/or perpetrator will be contacted as soon as possible and if applicable, following advice from statutory agencies.
- Internally the safeguarding escalation flow chart will be activated.
- Following guidance from statutory agencies The Football Association and Premier League may be notified (under Premier League Rule section S) within 24 hours.
- Allegations have the right to have their case dealt with fairly, quickly, and consistently and to be kept informed of its progress. Suspension is an entirely neutral act and may assist the
- unfettered investigation of concerns. However, it is not the default option and alternatives to suspension will be considered. In some cases, staff may be suspended where this is deemed to be the best way to ensure that both the staff member and children are protected. In the event of suspension, the Club will provide support and a named contact for the member of staff.

Remember:

It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen.

Reporting and responding to low level concerns about colleagues/members of staff

Where a low-level concern has been identified, this should be reported as soon as possible and no later than 24 hours from having the concern.

The concern should be made to Head of Safeguarding, Designated Safeguarding Lead and/ or HR. The recording of low-level concerns follows the same process as all safeguarding concerns. Where a low-level concern has been raised this will be taken seriously and managed promptly. The Safeguarding lead will follow the allegations procedure within the Safeguarding Policy and the HR Disciplinary Policy will be followed to ensure all relevant information is gathered in a timely manner.

The information reported and gathered will then be reviewed to determine whether the behaviour:

- is consistent with the "Premier League Safer Working Practice" – no further action will be required
- constitutes a low-level concern: no further action is required, or additional training/guidance/support may be required to rectify the behaviour as part of normal day-today management processes.
- The individual should understand that failure to improve or a repeat of the behaviour may lead to further action being taken, e.g., either via the Performance Management or Disciplinary Processes.
- is serious enough to consult with or refer to the LADO, including a notification to the FA.
- when considered with any other low-level concerns that have previously been raised about the same individual, this may result in the concern being reclassified as an allegation and referred to the LADO or Police. This will involve a referral to The FA and HR processes.
- Feedback will be given to both parties to explain to support learning and development in practice.

Can the reporting person remain anonymous?

The person bringing forward the concern will be named in the written record. Where they request to remain anonymous, this will be respected as far as possible. However, there may be circumstances where this is not possible, e.g., where a fair disciplinary investigation is needed or where a later criminal investigation is required
Any suspicion or concern arising outside the immediate sporting environment (so an adult working with a child or young person not employed by Wolves FC) must be reported immediately to the Safeguarding Team.

Supervision and Support

Managing a child through a challenging time in their life (including abuse) can be stressful and upsetting for colleagues. This emotive topic can be difficult for managers supporting their colleagues as well. It is important that colleagues and managers engage with the Safeguarding Team particularly after an incident to ensure that appropriate support, counselling, and supervision can be actioned for colleagues involved. Staff can access group supervision and one to one supervision. We have a safeguarding supervision policy in place that can be followed.

Managing a high-profile concern

Designated Safeguarding Officers and Senior Management are advised to familiarise themselves with the document 'Crisis incident response Guidance', which details the internal steps that will be taken to appropriately manage cases where a high-risk safeguarding case has taken place.

Non-recent abuse Allegations

Non-recent abuse allegations refer to allegations concerning staff who no longer work at the Club. Any staff that become aware of an incident should report it to the Head of Safeguarding. All non-recent abuse allegations will be reported to the Local Authority Designated Officer and the Police even if the alleged perpetrator of the abuse is believed to be deceased.

Complaints Procedure

Our complaints procedure will be followed where a child or parent/carer raises a concern about poor practice towards a child that initially does not reach the threshold for a safeguarding concern.

A safeguarding complaint may include:

- Poor practice, examples include unfairly singling out a child or attempting to humiliate them, bullying, or belittling a child or discriminating against them in some way.
- Formal complaints are managed by senior staff.
- Complaint and feedback mechanisms should be promoted on all children's activities.
- Complaints from staff are dealt with under the Club's complaints and disciplinary and grievance procedures.
- Complaints which escalate into a child protection concern will be managed under the Club's safeguarding and child protection procedures.

STAFF TRAINING AND INDUCTION

New staff will receive a briefing during their induction by their line manager, which includes familiarisation with the Club's safeguarding policy, safe working practices, reporting and recording arrangements and details for their Designated Safeguarding Officer(s) and the Head of Safeguarding. Staff should be aware of systems within the Club which support safeguarding. All staff members should also receive appropriate safeguarding and child protection information throughout the season.

The minimum being:

For staff working with children in Regulated Activity - The FA Safeguarding Children Workshop (or equivalent) Essential club and/or Premier League Safeguarding Training

For other staff working with children in a position of authority and trust - Essential club and/or Premier League Safeguarding Training plus additional appropriate safeguarding information and/or training.

For all other staff - Safeguarding awareness through safeguarding emails and other communications.

Staff are responsible for maintaining their certificates and ensuring that their safeguarding training, first aid and criminal records checks are updated every three years.
Visitors with a professional role, such as social worker or members of the Police will have been vetted by their own organisation.

Any professionals visiting the Club should provide evidence of their professional role and employment details (an identity badge for example). If felt necessary, the Club can also contact the relevant organisation to verify the visitor's identity.

Safer Recruitment

The club recognises the importance of safe recruitment and has considered the government guidance in Keeping Children Safe in Education 2018 and the FA's Responsible Recruitment guidelines to ensure there is a safe and responsible recruitment process for all individuals within the club who meet children and young people. This applies whether in a paid or voluntary capacity.

The club's safe recruitment process includes:

- Monthly practitioners panel chaired by Head of HR to discuss key issues and best practice.
- A commitment to ensuring job descriptions and job advertisements highlight the key responsibilities of the role and the club's commitment to safeguarding.
- Applications must be in writing; the club will then shortlist and interview as appropriate for the role. Each candidate will be interviewed by at least two members of staff prior to any offer and interviews questions will include dedicated safeguarding questions.
- Ensuring all applicants identity, qualifications and experience are verified through original documentation and any gaps in will employment will be properly explored.
- Those working with children/adults at risk will need two written references
- All roles or positions will require satisfactory references and criminal record checks under the Disclosure & Barring Service (DBS) appropriate to the role concerned.

A person shall not commence work until such time that all background checks and references are completed and deemed to be acceptable by the club. A list of key information including DBSs will be maintained.

Prevent Duty

it is essential that staff can identify children who may be vulnerable to radicalisation and know what to do when they are identified. Prevent Duty is embedded within our safeguarding process. We have a responsibility to ensure that we are helping protect our young people from radicalising influences and able to Identify any vulnerabilities or worrying changes in behaviour.

Essential training can be found here - https://www.elearning.prevent.homeoffice.gov.uk/edu/screen1.html

Storage of Information:

- Child protection information will be stored and handled in line with all applicable Data Protection Legislation. Information will be stored separately from other records and in a secure place with limited access to designated people, in line with the NSPCC Guidance on Child Protection Records Retention and Storage and all applicable Data Protection Legislation (e.g., that information is accurate, regularly updated, relevant and secure). Written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals, on a need-to-know basis only.
- The Head of Safeguarding will normally obtain consent from the child and/ or parents/ carers to share sensitive information (or, as it is known under the Data Protection Legislation, "special category personal data") within the Club or with outside agencies. Where there is good reason to do so, the Head of Safeguarding may share such information without consent and will record the reason for not obtaining consent.
- Child protection records are normally exempt from the disclosure provisions of the Data Protection Legislation, which means that children and parents/carers do not have an automatic right to see them. If any member of staff receives a request from a child or parent to see child protection records, they will refer the request to Head of Safeguarding.
- Neither Data Protection Legislation nor the Club's Data Protection Policy prevents staff from sharing information with relevant agencies, where that information may help to protect a child. Files on children concerns are secured electronically.
- The case management process records how and when concerns are received and responded to, together with details on how the concerns have been dealt with

Information Sharing and Duty to Inform:

Children's Wellbeing and Schools Act 2026 has made it clear that effective safeguarding depends upon the timely, necessary, and proportionate sharing of information. Information will be shared with appropriate agencies, football authorities, and partner organisations where doing so is necessary to safeguard or promote the welfare of a child, young person, or adult at risk.

The Club acknowledges that data protection legislation, confidentiality and consent should not be used as barriers to the lawful sharing of safeguarding information. Where there are safeguarding concerns, information will be shared in accordance with statutory guidance, legal obligations and the principles of necessity, proportionality, relevance and the best interests of the child or adult at risk.

This means we are committed to sharing safeguarding information proactively where it may help protect or promote the welfare of a child or young person and we continually strive to ensure our workforce understands their duty and responsibilities.

Head of Safeguarding Responsibilities when there is an Allegation of Abuse

1. The Head of Safeguarding will ask for a written factual statement from the person making the report – this must be signed and dated. If any statement has been made by the child, this should be reported in the child's own words. These reports should be confined to facts and should not include any opinion, interpretation, or judgement.
2. If the report involves an allegation about a member of staff, this will be referred out to Wolverhampton LADO (Local Authority Designated Officer) Otherwise, if abuse is suspected, the Head of Safeguarding will contact children's social care where the incident occurred or where the child lives. Children's social care may involve the police. The Head of Department (or, if the Foundation, the Chief Executive Officer) will be informed of the referral and the Director of HR will also be notified. The parents/carers of the child will be contacted as soon as possible following advice from children's social care or the police.
3. The Safeguarding Officer or line manager will ensure that any child concerned is immediately removed from any possible risk of harm.
4. Once children's social care has been informed and the incident accepted as a referral or notification, the Head of Safeguarding will notify the Club's Head of Legal. If the allegation relates to a member of staff, the Head of Safeguarding will also make the Club's Head of Media aware to liaise with the FA (or relevant Sport Governing Body) media department and agree a holding statement.
5. On confirmation that a referral has been accepted: The Head of Safeguarding will notify the FA Safeguarding Team (and other relevant Sport Governing Body), using the FA's Affiliated Football Referral Form (E: safeguarding@thefa.com). The FA will deal with any media enquiries. - The Head of Safeguarding will also notify the Safeguarding Lead at the Premier League (E: safeguarding@ premierleague.com). Wolves Foundation: If the referral relates to a member of staff, worker, consultant, third party or volunteer then the Premier League Charity Fund (E: safeguarding@ plcf. co.uk) and the Charity Commission (E: RSI@charitycommission.gsi.gov.uk) must be informed. Note: If the abuse relates to a participant disclosing abuse outside the Foundation, this does not need to be shared with the PLCF or Charity Commission. The Charity Commission are only expecting reports regarding abuse or harm to beneficiaries within the charity's care.
6. All information will be dealt with confidentially and shared only with the people on a need-to know or who-must-know basis.
7. If the Head of Safeguarding is implicated, the Head of Legal should be contacted who will inform children's social care in line with the procedure in this section.

REMEMBER - reading and understanding this policy, referring to it, following safe working practice and being familiar with wider safeguarding issues, for example bullying, physical contact, sexual exploitation, radicalisation and extremism, e-safety and information-sharing is everyone's responsibility.

Esport

We have a designated safeguarding lead within the team. We follow existing practise already in place and refer to academy transport policies, safer recruitment, risk assessment processes in the same way we would for an academy player. We have an internal best practise established with legal. HR, Safeguarding and Esport senior staff to navigate how to ensure best safe practise in this new and emerging area of work for us.

Photography and Images

Most people who take or view photographs or videos of children do so for entirely innocent and legitimate reasons. Sadly, some people abuse children through taking or distributing images. We must therefore ensure that we have some safeguards in place.
To protect children, we will:

- Seek parental consent for photographs to be taken or published (for example, on our website, on our publications or in newspapers). If a child does not wish to have their image taken, we will respect this.
- Use the child's first name with an image if consent has been given to do so.
- Ensure children should be appropriately dressed in outer clothing garments covering their torso from at least the bottom of their neck to their thighs (i.e., a minimum of vest/ shirt and shorts) and feature safety equipment, such as shin pads or guards.
- Encourage children to tell us if they are worried about any photographs that are taken of them. Forbid photography in private areas, such as changing rooms, toilets,
- showers, or bedroom or whilst a child is in a state of undress.

Matchday Photography

Children and young people attend games as spectators. Images of children may appear as part of the crowd on matchdays and be reproduced in official Wolves promotional material and appear in the public domain. The Club's terms and conditions of ticket purchase and standard ground regulations state that images may be taken of fans within the crowd and used in promotional material. Ticket holders agree to these conditions when purchasing a ticket. Any queries on promotional material featuring a child/ child should be addressed to The Head of Safeguarding and/or Head of Media.

Lost or Missing Children

During club activities every effort is made to ensure children and young people remain with their parents, carers, or the activity leaders. Should a child or young person become lost or go missing during a club activity every effort will be made to locate the child or young person as quickly as possible. Should the child or young person not be located within a reasonable timeframe, contact will be made immediately with their parents or carers and the police to file a missing child/young person's report. In the event of any such report being made the issue must also be reported to the Safeguarding team at the earliest possible opportunity and recording on MyConcern.

E-Safety, Artificial Intelligence (AI) and Social Media

Children and young people increasingly use electronic equipment daily to access the internet and share content and images via social networking sites such as Facebook, X, Snapchat, Instagram, TikTok and other online platforms. Unfortunately, some adults and young people use these technologies to harm children.

The harm may range from sending hurtful or abusive messages, to grooming and exploitation, coercion, sharing indecent images, online blackmail (sextortion), live-streaming abuse, or arranging face-to-face meetings.
Artificial Intelligence (AI) and Emerging Online Risks
We recognise the growing risks associated with artificial intelligence (AI) and other emerging technologies. AI tools can be used positively; however, they can also be misused to facilitate abuse, exploitation and harm.

Risks may include:
- The creation, sharing or threat of sharing manipulated or synthetic images and videos (deepfakes)
- Impersonation of trusted individuals using AI-generated content
- AI-enabled grooming and exploitation
- Online coercion linked to image sharing
- Online blackmail (sextortion)
- Live-streaming abuse
- Harmful peer-on-peer behaviour facilitated through technology
- The use of AI tools to generate harmful, abusive, discriminatory or inappropriate content

All staff should remain alert to these risks and understand that technology may be used to facilitate abuse. Any concerns relating to AI-enabled harm, online exploitation, image-based abuse, grooming, coercion, or harmful online behaviour must be treated as safeguarding concerns and reported in accordance with this policy.

Filtering, Monitoring and Online Safety

The Club implements appropriate filtering and monitoring systems to help safeguard children and young people when accessing Club networks, devices, and internet services. These systems are regularly reviewed to ensure they remain effective, proportionate, and responsive to emerging online risks and technological developments.
Cyberbullying, sexting, online abuse, AI-enabled harm, and peer-on-peer abuse will be treated as seriously as any other form of safeguarding concern and managed in line with the Club's safeguarding and child protection procedures.

Cyberbullying and sexting by children on Club activities will be treated:
- as seriously as any other type of bullying and will be managed through our anti-bullying procedures. Serious incidents, such as sexting and peer-on-peer abuse will be managed in line with our child protection procedures and/or Managing Allegations Against Other Children policy in line with UKCCIS Guidance: Sexting in schools and colleges, responding to incidents, and safeguarding young people (2017).

- Many children own or have access to handheld devices and the Club encourages parents and carers to keep their children safe when using the internet and social media at home and in the community.
- We take part in national awareness events and regularly share information via newsletters. As a rule, children are not allowed to take images on Club activities, in particular images are prohibited in private areas such as: toilets, changing rooms, showers, and bedrooms and when other children are in a state of undress.

E-Safety and Staff

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

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

- Staff should not have direct personal communication with children/young people from Club activities using ICT, e.g., email, mobiles (unless an approved arrangement is in place)
- On Facebook, or any other social media, any requests from children or their parents/carers should be rejected. Concerns arising from contact on Facebook or other social media from children should be directed to the designated safeguarding officer or the Head of Safeguarding. This will help to avoid blurring boundaries between personal and professional life.
- As a general policy, communication with children age under 16 is via the Club through the parent/carer or school/organisation. However, the Club recognises that direct communication with young people may be required on certain activities for professional and welfare purposes and in such circumstances the Designated Safeguarding Officer /Head of Safeguarding should be updated
- From 3 April 2017 anti-grooming legislation (Section 67 of the Serious Crime Act 2015) came into force and it became illegal for adults to send sexual communication to children under 16 years of age for the purposes of sexual gratification. The law covers both online and offline communication, including social media, email, and letters. Wolves has an appropriate filtering system that manages the following content (and web search): discrimination; drugs/substance; extremism; malware hacking; pornography; piracy and copyright; self-harm; violence. This includes the Academy setting and the Wi-Fi settings for Academy visitors (including parents/carers and children)

Children and Young People on Work Experience

The Director of HR and the Head of Safeguarding should be informed of work experience placements at the Club for children of compulsory school age and young people. The Club's Safeguarding Policy, including its Code of Ethics and Conduct, apply to staff overseeing these placements. Any work experience placements must be agreed by the Director of HR and approved by the Head of Department. The placement must be planned and structured in advanced. Work experience placements should not have unsupervised access to children.

Staff that are of Compulsory School Age

Children of compulsory school age employed as staff are subject to more stringent employment conditions and hours than young people (16-18) and require close supervision. Children of compulsory school age require an employment licence from the Education Welfare Service in the Local Authority they intend to work, along with consent from the parent/carer and the school. Seek advice from the Head of Safeguarding and Welfare. Young People as Sports Coaches Many sports have a system to allow under 18's to receive coaching or refereeing awards, but this should be about developing a young person's sense of belonging and responsibility rather than depending on them to take full responsibility for managing a group of children. Coaches under the age of 18 can only supplement the adult coaches supervising the activity.

THIRD PARTY ORGANISATIONS

The Club obtains written confirmation from supply agencies or third-party organisations that agency staff or other individuals who may work at the Club with children have been appropriately screened. Arrangements should be that such staff work in an open environment with Club staff overseeing.

Contractors

Contractors will be given a site induction from their Club contact, including an expected code of behaviour/expectations for conduct.

- To avoid compromising situations, the contractor will be required to avoid contact with children.
- In the event of a contractor carrying out work in an area that is usually occupied by children, this work will be undertaken when children are not present, or where this is not possible, the contractor will work in an open environment and will be overseen by Club personnel.
- Where supervision is not possible, for example in parts of the premises where Club personnel plans will be made to avoid contact with children.

More information can be found www.wolves.co.uk/club/policies/safeguarding

Visitors to the Club

Including contractors, are asked to sign in and are given a badge, which confirms they have permission to be on site. This badge should always be worn. Parents/carers who are delivering or collecting their children do not need to sign in. All visitors are expected to observe the Club's safeguarding and health and safety regulations to ensure children are kept safe. The Club policy is that visitors should be supervised by Club staff while on site.

MATCHDAY

It is important to Wolves FC that we safeguard all those involved in the match day event, whether as staff, participant, spectator, or player.

The Clubs responsibilities towards a child/children or adults at risk goes beyond entering and leaving the ground.

It is important to note that the club recognises it may not be immediately apparent whether older teenagers may be aged U18 and are therefore a child or whether an adult, has care and support needs and may be deemed an adult at risk. All situations should be based on the best judgement of the individual handling the incident or concern and should seek advice.

Babes in arms and Children under 5:

Wolves recommends that fans do not bring babes in arms to football matches as it can be very noisy however we do have some very young children at some games. You should be aware of small children within your designated area and always consider their and their parent's welfare.

Pushchairs and buggies are not allowed into the stadium, babies must be securely strapped to their parent or carer by way of a baby carrier, sling, papoose or similar.

Separated child or adult at risk.

If a steward is informed that a child or adult at risk has become separated from their party

1. Steward must obtain as much information as possible (name, gender, ethnicity, clothing) including where missing person last seen.
2. This information should be shared immediately to Control or via their supervisor
3. The safety officer will be informed
4. The radio controller will immediately circulate a description of missing person
5. The steward or supervisor will remain in the area where the missing person was last sighted ideally with the person who reported them missing for at least 5 minutes.
6. CCTV will be used to review area
7. If the missing person has not been found within 5 minutes of being reported missing tactical options will be followed including deploying a response team to search for the missing person.
8. The police in attendance will be informed and a PA announcement considered.
9. If information becomes known that the missing person last left the stadium staff may search within a local footprint
10. If the person is found, then two stewards will escort them back to parents/carers/ guardians – the police will immediately be informed. All personal details will be recorded, and the log of events sent to the Head of safeguarding
11. If the person has not been found within 30 minutes or less if instructed by Police. Staff will work under the command of investigating officer in liaison with safety officer

A steward locates or is approached by a lost child/vulnerable adult.

1. Steward should summon a colleague to ensure two people present
2. The steward should inform control via their supervisor of incident.
3. If wearing a wristband that information should be shared with control and CCTV can monitor both stewards escorting the child/adult back to their seat. The carer/parents should be called out from their seat and the steward should explain where the child/adult was found.
4. If NOT wearing a wristband the stewards should stay with the child/ adult in the area to see if adult/parent/carer returns.
5. CCTV should monitor situation
6. The child/adult should be reassured, and their name/age should be noted.
7. If the child/adult has not been reunited with their carer/parents/guardian after 5 minutes Control may make the decision to make a PA announcement. The child/adult should be taken to a rendezvous point. Any children lost or found in the BW/JH will use the BW first aid room. Any children lost or found in the SC/SB or outside will use the SB first aid room. Post-match: reception will be used.
8. A child or vulnerable adult should NOT be handed over to any intoxicated adult or a person believed to be under the influence of controlled drugs. If the safety officer/designated safeguarding officer believes this to be the case, then advice from the Police will be sought.
9. In the unlikely circumstances that a child/adult cannot be repatriated with a parents/carer/ guarding the event has concluded then the safety officer will hand the child/adult over to the Police.
10. All personal details will be recorded, and the log of events sent to the Head of Safeguarding

Searching U18s

Stewards should always identify themselves and provide proof that they are an authorised event steward for this event. Good practice is to have two stewards present for the search, who should both give their name and job title.
No searching will be carried out on children (U14) unless there is a specific threat to the safety of others and then only with the child's permission and if possible, with a parent or carer present.
Same gender searching must be used and must be witnessed by a second steward.

Thereafter stewards should follow the below procedures:

1. Explain the reason for the search.
2. Ask the child for permission to undertake the search, explain that the person has a right to refuse. If an adult is present with the child, obtain their permission to conduct the search.
3. Ask the child if they are carrying anything which may be dangerous, prohibited or that they plan to use to celebrate during the match.
4. Ask the child if anyone else has asked them to carry anything for them.
5. Explain what they think they may find in the search.
6. Only search people of the same gender as themselves.
7. Follow the correct Stadium procedure when finding unauthorised items and explain these procedures to the people involved.
8. Keep people only for as long as necessary.

Stewards should not need to touch the child during the search, as the procedure is to guide the child or young person to demonstrate that they are not carrying/hiding any dangerous or prohibited items

1. Ask the child to empty and turn out their pockets.
2. Ask the child to take off any outer jacket(s) and pass them over to the other steward for searching.
3. Ask the child to roll up their trousers to the knees and roll down their socks.
4. If wearing trousers, ask them to pull out the shirt at the waist and visually ensure there is nothing in the trouser belt area.
5. Request that they replace all clothing before moving on.

Children displaying challenging behaviour.

Stewards must show maximum tolerance when dealing with children. Physical restraint must only be used as the very last resort, and then only to prevent the child from harming him or herself, or harming others, or damaging property. It should never be used just to move a child from one position to another. Even in the rare event of a steward needing to separate two fighting children, minimum force only may be used. Only in the most extreme cases of misbehaviour will it be considered necessary to remove a child from the stadium. In such cases the parent/carer should accompany the child outside the stadium. If they refuse to do so, they should be allowed to remain, though under strict supervision and informed that they may be subject to an extended banning order.

Unaccompanied minors

A child who has travelled to the stadium alone must not be removed from the stadium. If his/her behaviour is so extreme as to cause actual or potential harm, he should be taken to a place of safety within the stadium, as dictated by the safety officer. The place of safety must have toilet facilities and a telephone. Parents must be contacted immediately and asked to collect their child from the stadium as soon as possible. The child must be released into the care of an adult even if this means waiting until after the end of the match. The child must be accompanied by at least two stewards throughout the procedure and one steward at least should be the same gender as the child.

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

We encourage you to oversee your own reading and learning.
If you have a gap in knowledge, then fill it!

Pitch incursion

Child/children or an adult at risk may attempt to gain access to the pitch then. Staff should make their supervisor aware so that the Control Room can be made aware, and the necessary staff can support. If a child/young person does run onto the pitch you may use your body and arms to block them, and using open hands attempt to stop them however you should not hold on to a child or 'grab' them. Stewards must show maximum tolerance when dealing with children.

You play an important role in ensuring children, young people and adults at risk are safe in our ground and have a positive experience. If you have any concerns that a child or adult at risk may be suffering abuse or neglect you must make your supervisor aware, and we may decide that we must refer our concerns to the local authority.

Match Day Ball Assistants

At Wolves, we are proud to have a dedicated team from within our Foundation supporting our Ball Assistants. We do not appoint any Ball Assistants under the age of 13. For evening and Sunday fixtures, all Ball Assistants are aged 16 or over. We obtain a Child Worker Permit through Wolverhampton Local Authority for all 13 – 15 year olds.

Our 16-year-old Ball Assistants are recognised as young adult workers and are onboarded as volunteers in line with our full safer recruitment procedures. Every Ball Assistant receives comprehensive training and ongoing support, and we regularly seek their feedback to ensure a positive experience.

We are especially proud that all our Ball Assistants are local to Wolverhampton and consistently express how much they enjoy being part of the matchday experience

Academy

Transport and Travel

We have a dedicated role within The Academy that manages our transport provision to players. We have a standalone policy that is reviewed each season. Our offer includes a mixture of Academy drivers and a contract and service level agreement with a local taxi provider.

ACCOMMODATION

Hotels

If an Academy player is required to stay overnight in hotel accommodation for an Academy activity, the child/children will be accompanied by at least two staff members who have been DBS checked and have undertaken safeguarding training. Parental consent will be sought in advance.
Trialists: No child under the age of 18 should stay in a hotel on their own without adult supervision (e.g., a parent or designated guardian).

Host Families

Academy Host Families welcome elite young players into their homes. Hosts are not employees of Wolves but will be subject to host family recruitment and selection protocols, such as an application form, self-declaration form, home visits, references, and a Host Family Code of Conduct.
Hosts will be visited in their homes as part of the recruitment and selection process and an assessment made of the home and accommodation offered. The family will be subject to an Enhanced DBS check with Children's Barred List check for overnight accommodation. Any other household members aged 16 and over will be subject to a DBS check at basic level.
The home will be subject to initial and ongoing health and safety risk assessment with an annual check before the start of the new season in July. Landlord certificates (or equivalent) for electric and gas obtained. As part of the Academy's ongoing vigilance, Hosts will be regularly monitored and visited by The Player Care Team with support from the Head of Safeguarding.
Hosts will be given appropriate training and support for their role – this will be organised by the Player care team. The training will include safeguarding, first aid, diet, and lifestyle. The Club will seek guidance from specialist organisations.

Private Fostering

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

Youth Loans, Trials & Work Experience Parental Consent

If an Academy Player or young Professional under the age of 18 joins another club on trial, work experience or a Football League Youth Loan consideration will also be given to the player's education programme, travel, and accommodation arrangements.
A loan player is supported by our Loans Manager and the Player Care Team. A trialist or work experience player will be supported by the Player Care team. Updates are regularly shared, and players welfare is discussed regularly whilst on loan, trial, or work experience.

Visiting Trialists

For players under the age of 18 who are joining Wolves Academy on trial (including Work Experience), parental consent will be sought prior to the trial taking place, along with a full medical history and injury disclaimer.

Where accommodation is required during the trial period, the player should be accompanied by an appropriate adult (ideally a parent/carer) – this is the first and preferred option for a trialist's initial visit – and a local hotel may be used. It is the responsibility of the child's parent/carer to ensure safe travel and accommodation arrangements and if the child is accompanied by an adult who is not a parent/carer then it is good practice for separate rooms to be booked.

After the first few initial visits, host family accommodation may be considered if the child is not accompanied by an appropriate adult.

U18, 21 & First Team Progression

As players progress through the Academy system, they may have the opportunity to train and play with the adult provision of the Club. The Club will support the player(s) during this transition and the preparation starts in Youth Development Phase through to the Professional Development Phase with extra activities to develop life skills and independence in the education programme, along with support from Academy staff.

Staff working with Development and First Team provision are DBS checked and receive safeguarding training or awareness. We offer support to any Under 18 'playing up' and have a standalone protocol which identifies vulnerability, risks to promotes vigilance from staff to safeguard the welfare and wellbeing of the player.

Academy Tours and Tournaments

The opportunity to take part in tours and tournaments is something our players really look forward to and we want them to have the best experience they can. We make sure that we update parents and players before going and can answer any worries or concerns.

We ensure:

- Parental consent and arrange how we will be keeping in touch during the tour.
- A designated safeguarding/player care lead is identified for the tour and is responsible for holding emergency contact and personal details for players and staff.
- Academy staff are responsible for players at all times.
- Vehicles used for carrying players and staff will be roadworthy, checks to be made on vehicles on a weekly basis and vehicles insured for the purpose.
- Alternatively, a travel company will be used, and assurances sought that vehicle are roadworthy, and staff are appropriately qualified.
- Any hired vehicles and drivers will be hired from reputable companies.
- All drivers of any vehicles used to transport players and coaches will have passed relevant driving tests, assessments and hold proper insurance to do so.
- Adequate adult/player ratios will be followed for any residential tours.
- If residential tours are undertaken, accommodation booked will be of suitable standard for players' safety and comfort and a pre-visit will be made by a member of Wolves staff.
- Suitable food and drink are provided throughout the tour (unless notified in advance).
- A risk assessment will be completed and signed off – including designated safeguarding lead and/or Head of Safeguarding Staff do not share rooms with players.
- Staff will update My Concern with any worries/concerns.
- Staff and player debrief at the end of each tour/tournament, and we take the positives and 'lessons learnt' into the next opportunity.

In addition to this policy, there are several additional policies, procedures, and guidance in place to support vulnerable groups, colleagues, volunteers, and parents/carers to understand Wolves FC and the Foundation's commitment to safeguarding.

The list is not exhaustive. For further information please contact the Safeguarding Team.

- Risk assessments
- Crisis Management Guidance
- Supporting guidance on Recruitment and selection of colleagues and volunteers in positions of trust Photography and Images of Children – on and off the pitch Stadium Security Match Day safeguarding operations
- Host Families – Accommodation Provision Transport Policy
- Safeguarding Quality Assurance policy and process.

EXTERNAL SAFEGUARDING CONTACTS:

Premier League
Head of Safeguarding Jessica Addicott - jaddicott@premierleague.com

NSPC
0808 800 5000 (24-hour helpline) help@nspcc.org.uk | www.nspcc.org.uk

Child Line
0800 1111 2417 | www.childline.org.uk

Child Protection in Sport Unit
0116 234 7278 | cpsu@nspcc.org.uk | www.thecpsu.org.uk

CEOP Centre – Child Exploitation and Online Protection
www.thinkuknow.co.uk | www.ceop.police.uk

VERSION 4.0
August 26

Head of Safeguarding - Lisa Carter