

Section 4

4.0 Responsibility for safeguarding in football

We all have a moral and legal responsibility for the safety and protection of children and young people within football. However, there are people designated at every level of the game who take a lead with regards to safeguarding children and young people. Their role also includes supporting staff and volunteers in raising and thinking through how to manage concerns with the aim of making football as safe as possible for all concerned.

The FA requires a Welfare Officer in all clubs and leagues with youth teams in order to affiliate in grassroots football. The Welfare Officer role is a position of significant responsibility. The FA therefore requires that prior to appointment, every potential Welfare Officer is considered to be 'suitable' to hold such a position as defined in the 'Welfare Officer Person Specification and Suitability Checklist' see Appendix 4.

The FA requires that all Welfare Officers are perceived as being approachable, having a child-centred approach and the ability to maintain this perspective when carrying out their role. A Welfare Officer should be clearly identified in every football setting and that includes football festivals and tournaments.

All grassroots football Welfare Officers must have:

- Attended an FA Safeguarding Children Workshop
- Attended a Welfare Officer Workshop
- Completed a Disclosure Barring Service Enhanced Criminal Record Check: with Children's Barred List via The FA Criminal Records Body

- Been made aware of The FA's Welfare Officer Code of Conduct, (for more information please see Appendix 5).

For more information about The FA's safeguarding courses and how to book on them please visit – www.TheFA.com/football-rules-governance/safeguarding/raising-awareness---downloads-section or speak with your CFA Welfare Officer.

4.1 The club Welfare Officer

Where clubs have multiple youth teams feedback from Welfare Officers has shown that having more than one Welfare Officer in place is incredibly helpful. Your club might wish to consider having a Welfare Officer for each of its age groups or perhaps one for boys' teams and another for girls' teams.

Having a realistic ratio of Welfare Officers to teams will help to ensure everyone knows who their Welfare Officer is, how to contact them and therefore ensure more effective safeguards are in place in your club. Why not speak with other clubs and see what the benefits have been for them.

We would also recommend that the Welfare Officer sits on the club's management committee in order that safeguarding becomes embedded in grassroots football – remember safeguarding is everyone's responsibility and the club's management committee must play its part in supporting the club Welfare Officer.

The club Welfare Officers are responsible for promoting best practice throughout the club and play a key role in dealing with poor practice concerns in line with the club's own disciplinary processes. Matters of a more worrying nature should be referred to the CFA Welfare Officer for advice and support. Confidentiality regarding concerns should be maintained on a strictly 'need to know' basis.

Club Welfare Offices are required by The FA to:

- Know who the CFA Welfare Officer (CFA WO) is and how to contact them
- Refer all child protection and relevant poor practice concerns to the CFA WO
- Seek advice from the NSPCC Helpline if the CFA WO is unavailable or in circumstances of child protection urgency
- Seek advice from local Children's Social Care or the Police in an emergency
- Assist the club in effectively implementing The FA's safeguarding children policy
- Assist the club to utilise The FA's Safer Recruitment best practice guidance on recruiting volunteers and always requesting and following up references and recruitment checks
- Support the club in identifying those members who require a criminal records check, ensure they complete the appropriate check via the FACRB and making use of the Online Safeguarding Service to manage compliance across the club
- Promote, support and encourage the benefits of the Safeguarding Children education programme
- Assist the club in implementing The FA's best practice guidelines.

Please refer to section 3.3 or download information via – www.TheFA.com/football-rules-governance/safeguarding/raising-awareness---downloads-section

4.2 The youth league Welfare Officer

All Youth League Welfare Officers (YLWOs) are expected to promote awareness of The FA's safeguarding children policy and procedures and best practice guidelines. The introduction of codes of conduct, appropriate sanctions and proactive requirements for affiliation such as signing up to the Respect programme will do much to safeguard children and young people. It is anticipated that the league's rules and disciplinary procedures will deal appropriately with many poor practice issues.

However, where appropriate the YLWO may be required/asked to acknowledge and support sanctions imposed by the CFA. Any concerns about a child's or young person's welfare should be reported immediately to the CFA WO.

YLWO are required by The FA to:

- Know who their CFA WO is and how to contact them
- Know who their registered clubs Welfare Officers are and how to contact them
- Ensure all their registered clubs have a safeguarding children policy
- Encourage all their registered clubs to implement The FA's Safeguarding best practice guidelines
- Promote and support as many people as possible to complete The FA's Safeguarding Children Education programme
- Have an understanding of The FA CRB and its role within safeguarding children and young people

- Advocate the importance of complying with appropriate criminal records checks via the The FA CRB and make use of the Online Safeguarding Service to monitor club compliance
- Coordinate annual CWO network gatherings for those CWO who are affiliated to their league

Youth League Welfare Officers are also advised to make use of The FA's Respect programme which will help to embed safeguards. Please refer to section 3.2. or visit – www.TheFA.com/Respect

4.3 The county football association Welfare Officer

The CFA WO is a key member of The FA's safeguarding team and works closely with The FA. They will receive and collate child protection concerns in accordance with FA protocols and procedures and deal with poor practice concerns directly. As and when required they will seek advice from The FA Case Manager, Children's Social Care, the Police or the NSPCC Helpline regarding case referrals.

Part of their role is to promote and support the aims of The FA's safeguarding children policy and procedures and The FA's best practice guidelines. They will assist the youth, mini-soccer and girls' leagues to appoint Welfare Officers. Thereafter they will maintain contact with the network of Welfare Officers to offer support and guidance where necessary. The CFA WO will also support clubs and leagues in implementing criminal records checks and can advise on making use of The FA's Respect programme.

4.4 The FA's online safeguarding service

The FA Online Safeguarding Service (FA OSS) is a tool which allows club Welfare Officers to monitor who are current members at their club/league who has completed The FA's Safeguarding Children Workshop, who still needs to and who has completed a criminal records check and who still needs to.

Welfare Officers are reminded that they should be making use of The FA OSS each time they take on a new volunteer. Please note this is only available to Welfare Officers with an accepted criminal records check, Safeguarding Children Workshop (SCW) certificate and Welfare Officer Workshop (WOW) certificate. The system provides different levels of information for club and league Welfare Officers as detailed below.

This system for club Welfare Officers includes the following tools:

- Receive updates from the Equality & Children Protection (ECP) department via the Safeguarding page
- View the CRC and SCW Certificate via the Club Status screen
- Filter records by CRC Status (Accepted or Not Started)
- Remove individuals who are no longer involved with the club
- Add individuals missing from the club records
- Print the Safeguarding records of individuals at the club
- View the Safeguarding profile of an individual by clicking on an individual's FAN via the Club Status page. This includes their CRC, SCW and WOW records along with the contact details we have on record.

The system for league Welfare Officers includes the following tools:

- View the CRC, SCW and WOW information of individuals of any club within their league via the Safeguarding screen.
- View the Safeguarding profile of the club Welfare Officer by clicking on their FAN via the Safeguarding page. This includes their CRC, SCW and WOW records along with the contact details we have on record.

For more information about requesting access to this system, FAQs about the service and to access the CWO and YLWO users guide please contact your CFA Welfare Officer.

4.5 Everyone's responsibility; raising awareness

The network of designated persons is critical; but for clubs and leagues to be really effective in creating a well run, happy and safe club/league everyone needs to play their part.

Raising awareness of what safeguarding means for everyone will pay dividends. Make sure you encourage parents/carers as well as the club's/league's management committee to get to know your Welfare Officer(s) and also to attend The FA's Safeguarding Children Workshop.



Section 5

5.0 Poor practice and abuse

Child abuse is a very emotive and difficult subject. It is important to understand the feelings involved but not to allow them to interfere with our judgement about any action to be taken. It is also important that child abuse and child protection are openly discussed as this helps create an environment where people are more aware of the issues and sensitive to the needs of children. Open discussions also create environments that deter abusers.

Neglect and child abuse can occur anywhere both within and outside of the family. This includes sport, leisure, cultural, religious and care environments and on the transport to and from these places. It can also occur on-line and through social media. Recent inquiries have also indicated that abuse which takes place within a public setting is rarely a one-off event. This means that if abuse is detected, it is highly unlikely to be the first time it has happened. It is therefore crucial that all allegations and suspicions are treated seriously and appropriate actions taken.

Children may be harmed or abused by professionals, volunteers, carers, family members and by other children. The issue is the effect on the child; sometimes harm or abuse is intentional; sometimes the intent is unclear, sometimes the harm is unintended.

5.1 Legislative framework

The Children Acts 1989 and 2004 set out duties to support families to meet the needs of children, to meet needs and to carry out enquiries where 'significant harm' is suspected. This role is given to Social Care but all agencies and organisations have a duty to work together, share information and cooperate in the best interests of the child.

Working Together to Safeguard Children 2013 is the guidance for all local authorities and all agencies whether statutory, non-statutory and including sports bodies.

All local authorities have Local Safeguarding Children Boards (LSCBs) which coordinate the work of the agencies, and organisations in their area.

Extra government guidance, Safeguarding Disabled Children, was produced in 2009.

All individual agencies working with children will have their own child protection policies which fit into this framework.

It is not the role of The FA to investigate where significant harm to a child is suspected – but it is our role to carefully pass on to Social Care our concerns, record and report them accurately including areas we are unsure about – it is the role of the Police to investigate possible criminal offences and of Children's Social Care to investigate risks to children and to consider how they need to be managed.

The use of social media/mobile technology continues to increase and whilst they offer many benefits for football it's important that those working with children and young people understand that appropriate boundaries must be in place in an online environment just as they need to be on or off the field of play. For more information about social media refer to section 3.4.

An environment that explicitly attempts to identify and report abuse helps create a safer culture for children and young people.

Let's make football safe – not sorry.

Allegations may also relate to poor practice where an adult's or a peer's behaviour is inappropriate and may be causing concern to a young person within a football setting.

Poor practice includes any behaviour that contravenes existing Codes of Conduct, infringes an individual's rights and/or reflects a failure to fulfil the highest standards of care. Poor practice is unacceptable in football and will be treated seriously with appropriate actions taken. Sometimes a child or young person may not be aware that practice is poor or abusive and they may tolerate behaviour without complaint. An example of this is a child with a disability who is used to being excluded from activities or a bullied young person who is used to being mocked. Children may also be used to their cultural needs being ignored or their race abused. This does not make it acceptable.

Many children and young people will lack the skills or confidence to complain and it is therefore extremely important that adults in the club advocate for the children and young people. Advocating for children and young people who find it hard to speak out is part of creating a safer culture for them. For information about the categories of abuse and signs and indicators see Appendix 6. If you have not already attended The FA's Safeguarding Children Workshop but would like to find out more about Safeguarding Children in football then please contact your CFA Welfare Officer.



5.2 Relationships of trust

The power and influence an older colleague (where an U18 has taken on a leadership role) or member of staff has over someone attending a group activity cannot be underestimated. If there is an additional competitive aspect to the activity and the older person is responsible for the young person's success or failure to some extent, then the dependency of the younger member upon the older will be increased. This is the case in coaching. A coach has significant power and influence over his or her players and is therefore in a relationship of trust. Coaches are therefore expected to act within appropriate boundaries with their players, in relation to all forms of communication. Coaches should be mindful of any physical contact with their players and coaches should not have intimate or sexual relationships with their players. It is therefore vital for volunteers to recognise the responsibility they must exercise in ensuring that they do not abuse their position of trust.

Genuine relationships do occur between different levels of volunteers and participants in a group; however no intimate relationship should begin whilst the member of staff or volunteer is in a position of trust over them.

The FA acknowledges that intimate relationships between teenagers take place and often no harm comes from them. However, it is also acknowledged that children and young people who suffer abuse often do so at the hands of other children or young people.

It must be understood that the notion of 'relationships of trust' applies as much to young people who have taken on a leadership role as it does to adults involved in football.

"The inequality at the heart of a relationship or trust should be ended before any sexual relationship begins". Caring for Young People and the Vulnerable? Guidance for preventing abuse of trust (Home Office 1999).

Please note: young people aged 16-18 can legally consent to some types of sexual activity; however, in some provisions of legislation (under the Children's Act 1989) they are classified as children.

"It is an offence for a person aged 18 or over to involve a child under that age in sexual activity where he or she is in a specified position of trust in relation to that child. This includes those who care for, advise, supervise or train children and young people (Sexual Offences Act 2003)".

The principle of this section of the Sexual Offences Act 2003 will be applied by The FA thus if you engage in an intimate or inappropriate relationship with a young person it is a breach of The Football Association Regulations and as such may result in disciplinary action. You can download The FA's safeguarding regulations via this link – www.TheFA.com/~/_/media/files/thefaportal/governance-docs/rules-of-the-association/2014-15/025a_safeguarding-children-regs.ashx

For further guidance on 'position of trust' download the CPSU 'briefing paper' via – www.thecpsu.org.uk/resource-library/2013/abuse-of-positions-of-trust-within-sport/

5.3 Raising awareness of potential vulnerability

Some children may experience multiple challenges and difficulties. This could be due to family circumstances, poverty, discrimination, disability, family problems with mental health, domestic violence or substance and alcohol use. The more challenges facing a child or young person the greater their vulnerability.

This safeguarding children policy is inclusive and the same actions should be taken regardless of the needs and background of the child or young person. The FA recognises however that some children and young people are disadvantaged by their experiences and would want to highlight the following.

5.3.1 Children and young people with disabilities

Research has consistently shown that children with a disability are more at risk of abuse. Disability may be visible such as Cerebral Palsy or invisible such as a learning disability. Many things contribute to this including:

- Poor practice resulting from not understanding the care and support the child needs
- Attitudes and assumptions about disability
- Lack of awareness and the belief that disabled children are not abused
- Factors linked to the impairment i.e. it may be harder to communicate or avoid the abuser if the child depends on them
- Targetting by abusers who may believe they are less likely to tell or be believed

Because of this clubs may need to put extra safeguards in place. Best practice to build safeguards includes:

- Making sure everyone working with the child understands what the impairment actually means for the child
- Talking to the child and parents/carers to understand the child's needs
- Making sure there is a plan to meet additional needs and that this is clear and shared with those who work with the child

- Listening to what the child says and communicates by their behaviour as well as their words or signs
- Making sure the child knows who to go to and how to do so if they are worried about anything
- Observing carefully and getting to know the child and understanding how they respond to different experiences
- Reviewing the child's involvement regularly to help them get the most from the game
- Looking for the child's abilities not their disabilities!

For further information please download the 'Best Practice guidance for including and safeguarding children with disabilities' via – www.TheFA.com/football-rules-governance/safeguarding/raising-awareness---downloads-section

County Welfare Officers can also offer additional guidance and signposting to other organisations who can help and advise.

Coaches can take a course called 'Coaching Disabled Footballers' which helps safely include all children.

5.3.2 Children and young people from minority ethnic groups

Children and young people from minority ethnic groups are additionally vulnerable because they may be:

- Experiencing racism and racist attitudes
- Experiencing racism being ignored by people in authority
- Afraid of further abuse if they challenge others
- Subjected to myths, e.g. all people of a particular culture are good with or hit their children

- Wanting to fit in and not make a fuss
- Using or learning English as a second language.

The FA's commitment to ensuring that football is for everyone means that as more people from all communities and faiths get involved in the game, there is an increased possibility that instances of female genital mutilation, forced marriage or honour based violence may be reported or advice sought. Please refer to 5.3.3, 5.3.4 and 5.3.5 respectively for further advice and guidance.

"Child trafficking is about taking children out of their protective environment and preying on their vulnerability for the purpose of exploitation". International Labour Organisation (ILO).

Any concerns about the possibility of a child or young person being trafficked should be reported via the statutory agencies. Although no precise figures exist, the ILO (in 2005) estimated that between 980,000 to 1,225,000 children - both boys and girls - are in a forced labour situation as a result of trafficking internationally.

FIFA has implemented regulations and an on-line system to monitor and control the movement of under 18s to help safeguard children and young people in football. The regulations only permit the international movement of under 18s in very limited circumstances and require the approval of FIFA before an under 18 can be registered in a new country. The FA, Premier League and Football League work closely to ensure the FIFA regulations are fully respected by English clubs. If you have any concerns about a young person involved in football then please contact your CFA Welfare Officer or The FA Safeguarding Team.

For more information please download our 'Useful Contacts' document, via – www.TheFA.com/football-rules-governance/safeguarding/raising-awareness---downloads-section

5.3.3 Female Genital Mutilation (FGM)

Female genital mutilation is a form of child abuse common to some African, Asian and Middle Eastern communities in the UK. This illegal and life-threatening initiation ritual can leave young victims in agony and with physical and psychological problems that can continue into adulthood. Carried out in secret and often without anesthetic it involves the partial or total removal of the external female genital organs.

The NSPCC Female Genital Mutilation (FGM) helpline offers specialist advice, information and support to anyone concerned that a child's welfare is at risk because of female genital mutilation. Though callers' details can remain anonymous, any information that could protect a child from abuse will be passed to the Police or Social Care services.

Clubs should be mindful if a regular attender goes missing from a club or if a child, their peer or relative starts expressing worries about a trip abroad.

If you are worried that a child may be at risk of FGM, you can contact the 24 hour helpline anonymously on 0800 028 3550 or email fgmhelp@nspcc.org.uk.

If you wish to find out more about FGM then you can access the NSPCC's fact sheet via this link – www.nspcc.org.uk/Inform/resourcesforprofessionals/minorityethnic/female-genital-mutilation_wda96841.html

5.3.4 Forced marriage

A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. It is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights.

The pressure put on people to marry against their will can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological (for example, when someone is made to feel like they're bringing shame on their family).

The Forced Marriage Unit (FMU) operates a public helpline to provide advice and support to victims and those being pressurised into forced marriages. Of the 1,300 plus cases dealt with in 2012 40% of victims were under 18.

If you are worried that a child may be at risk of forced marriage, you can contact FMU via the helpline on 020 7008 0151 or email fmu@fco.gov.uk. For more information on forced marriages go to www.gov.uk/forced-marriage

5.3.5 Honour based violence

The term 'Honour Based Violence' (HBV) is the internationally recognised term describing cultural justifications for violence and abuse. It justifies the use of certain types of violence and abuse against women, men and children.

The Association of Chief Police Officers defines HBV as:

'A crime or incident, which has or may have been committed, to protect or defend the honour of the family and/or community'.

HBV cuts across all cultures, nationalities, faith groups and communities and transcends national and international boundaries. HBV is also a Domestic Abuse issue, a Child Abuse concern and a crime. If you are worried that a child may be at risk of HBV contact Children's Social Care for further advice and guidance or speak with your County FA Welfare Officer.

5.3.6 Supporting lesbian, gay, bisexual and transgender young people

Lesbian, gay, bisexual and transgender (LGB&T) young people come from all socio-economic backgrounds, religions, faiths, ethnicities and cultures. It is estimated that six per cent of the population is lesbian, gay or bisexual, so there's a good chance that in a group of 30 young people, at least two will be or will grow up to be lesbian, gay or bisexual. Most young people will know LGB people too, including family and friends. In addition, a 2010 piece of research, funded by the Home Office, estimated that between 300,000 and 500,000 people in the UK may identify as transgender.

However, LGB&T people remain largely invisible across sports, and two thirds of LGB young people say they don't like team sports. This lack of visibility, as well as the misapprehensions about LGB&T people, contribute to an environment of homophobia and transphobia in sport. This can potentially cause LGB&T young people to feel excluded, isolated or undervalued.

We therefore all have a role to play in dispelling myths about LGB&T people, challenging homophobia and transphobia when they occur, and creating a football environment where everyone feels included. It's important to remember that people realise they are lesbian, gay, bisexual or transgender at different stages of their lives; so if a young person seems to identify in a certain way, it doesn't mean they will remain that way in the future. It's also worth remembering that, when young people come out or identify a wish to reassign their current gender it's often the first time they've told anyone and how they do that will often be in response to the way they think others will react. Let them decide how they feel and what, if any, identity, they feel they have, and be supportive.

"Many lesbian, gay or bisexual people in sport face discrimination simply because they are perceived to be different from the heterosexual 'norm': As well as causing many lesbian, gay or bisexual athletes to leave clubs or sport entirely, in the worst cases such negative treatment has resulted in self harm or suicide".

Source: CPSU Homophobic Bullying in Youth Sport, April 2011

Every young person has the right to be treated with dignity and respect; this includes all young people who are openly lesbian, gay, bisexual or transgender or are thought to be. A club culture that permits casual use of homophobic or transphobic language makes it all the easier for players to suffer name calling and bullying. This can impact on a young person's sense of belonging, self-esteem and therein achievement.

Lesbian, gay, bisexual and transgender young people have the same needs as any other teenager. They'll enjoy, achieve and stay safe if they:

- Feel able to be themselves
- Feel valued for who they are
- Feel included and part of a community
- Have access to resources and information relevant to them
- Feel safe and supported
- Feel they have people to talk to if things aren't going so well

Don't make assumptions; it's impossible to tell whether a young person is lesbian, gay, bisexual or transgender by the way they act, talk, dress or by who their friends are.

Be positive when young people come out and know what to say; offer them reassurance, listen and be supportive – direct them to where they can get further advice and guidance.

Don't discuss a young person's sexual orientation; with their parents/carers without the young person's permission.

Protect young people from bullying; all young people have the right to grow up free from fear of bullying and that includes those young people who are lesbian, gay, bisexual or transgender.

Be inclusive; any football setting for young people can make sure it's inclusive by creating zero tolerance for homophobic and transphobic bullying. Make sure your club/league makes use of The FA's Equality and Anti-Bullying Policies

Much of this information has been taken from materials developed by Stonewall. For further information visit www.stonewall.org.uk, or to speak with someone call 0800 050 2020. The FA's equality team has more information about tackling homophobia in football, email equality@TheFA.com or visit www.TheFA.com/equality

5.3.7 Children and young people who take on leadership roles

Taking on a leadership role within football is intended to be an enjoyable and positive learning experience. However, coaches, club officials, players, parents/spectators in both adult and junior football often lose sight of the fact that an individual in a leadership role who is under 18 is still legally a child! As a consequence young coaches, medics and referees are open to experiencing abusive behaviour verbally, physically and emotionally. This behaviour is not acceptable in adult or youth football. The increased potential harm that verbal, physical and emotional abuse can cause to children and young people in these roles needs to be recognised.

It is important that clubs acknowledge their role in ensuring that club officials, players and spectators behave appropriately towards young people who take on such roles. It is necessary to recognise that, like adults, children and young people can and do make mistakes when they are learning, and overly critical and unsupportive responses may constitute verbal and or emotional abuse.

Some young match officials have experienced physical abuse from coaches, spectators and players. Please make use of the Respect Codes of Conduct to guide appropriate behaviour and ensure those who fail to adhere to their code are dealt with accordingly.

Remember failing to take action means you can become part of the problem!

Inappropriate behaviour unchallenged can often become the norm – everyone needs to take responsibility for creating change and ensuring positive and supportive environments for children and young people involved in football, whatever their role. There is safeguarding guidance provided directly to Young Leaders when they enter into the Football Futures Programme, if you would like more information about this please speak with your CFA Welfare Officer.

From January 2015 Children in Leadership positions over the age of 14 and under 16 can take The FA's new Online course 'Be on the Ball - Safeguarding Children in football'. This helps young leaders recognise poor practice and abuse and know how to report it. It helps them keep themselves safe from harm and report concerns.

5.4 Dealing with bullying

No one deserves to be the victim of bullying. Everyone has the right to be treated with respect. The FA will not accept or condone bullying in football and has defined bullying as a category of abuse. It is the responsibility of everyone in football, whatever their role, to ensure that bullying is dealt with appropriately.

Bullying can be defined as:

- Physical: hitting, kicking and theft
- Verbal: name-calling, constant teasing, sarcasm, racist, sexist or homophobic taunts or comments about disability, threats and gestures
- Emotional: tormenting, mobile text messaging, ridiculing, humiliating and ignoring or isolating.

Bullying can take place anywhere but is more likely to take place where there is inadequate supervision, e.g. in the changing rooms or on the way to and from the football pitch - but it can also take place at a training session or competition. Football's competitive nature can create and even support an environment for the bully if individuals and clubs are unaware or fail to challenge.

The bully in football can be:

- A parent who pushes too hard
- A coach or manager who has a win-at-all-costs philosophy
- A child or young person intimidating another
- An official who places unfair pressure on a child or young person.

The damage inflicted by bullying can often be underestimated. It can cause considerable distress to children and young people, in some cases affecting their health and development. In extreme circumstances it can lead to self-harm.

5.4.1 Bullying as a result of any form of discrimination

Bullying because of discrimination occurs when bullying is motivated by a prejudice against certain people or groups of people. This may be because of their gender, age, race, nationality, ethnic origin, religion or belief, sexual orientation, gender reassignment, disability or ability.

Generally, these forms of bullying look like other sorts of bullying, but in particular it can include:

- Verbal abuse – derogatory remarks about young female players, suggesting they are inferior to boys; or that young black, Asian or minority ethnic coaches are not as capable as white coaches; spreading rumours that a young referee is gay, or that someone or something is inferior and so they are 'gay' - for example, "you're so gay!" or "those trainers are so gay". Ridiculing a young volunteer because of a disability or mental health related issue, or because they have a physical, mental or emotional developmental delay. Referring to someone by the colour of their skin, rather than their name; using nicknames that have racial connotations; isolating someone because they come from another country or social background etc.
- Physical abuse – including hitting, punching, kicking, sexual assault, and threatening behaviour.

- Cyberbullying – using on-line spaces to spread rumours about someone or exclude them. It can also include text messaging, including video and picture messaging.

Discrimination is often driven by a lack of understanding which only serves to strengthen stereotypes and can potentially lead to actions that may cause women, ethnic minorities, disabled people, lesbian, gay, bisexual or transgender people, or people who follow specific religions or beliefs, to feel excluded, isolated or undervalued. Ensure that club members know that discriminatory language and behaviour will not be tolerated in your club/league.

- If an incident occurs, members should be informed that discriminatory language is offensive, and will not be tolerated. If a member continues to make discriminatory remarks, explain in detail the effects that discrimination and bullying has on people. If it is a young person making the remarks their parents should be informed just as in any breach of the club's Code of Conduct and Anti-Bullying policy
- If a member makes persistent remarks, they should be removed from the training setting in line with managing challenging behaviour procedures and the club Welfare Officer or club officials should talk to them in more detail about why their comments are unacceptable
- If the problem persists, the member should be made to understand the sanctions that will apply if they continue to use discriminatory language or behaviour

- Consider inviting the parents/carers to the club to discuss the attitudes of the youth member in line with the procedures detailed in The FA's Anti-Bullying template policy.

5.4.2 Cyberbullying

Young people are communicating more frequently online through social networking sites and via mobile – whilst a great way to communicate it also lends itself to potential abuse. Cyberbullying is when a person uses technology i.e. mobile phones or the internet (social networking sites, chat rooms, instant messenger), to deliberately upset someone. This behaviour can also be referred to as 'Trolling' when deliberately offensive comments are posted on an individual's social media pages aimed at causing upset and distress. This type of behaviour could result in legal action.

Bullies often feel anonymous and 'distanced' from the incident when it takes place online and 'bystanders' can easily become bullies themselves by forwarding the information on. There is a growing trend for bullying to occur on line or via texts - bullies no longer rely on being physically near to the young person.

Clubs and leagues have a responsibility to ensure their websites and/or social networking pages are being used appropriately and any online bullying must be dealt with swiftly and appropriately.

All young people should know that there are potential risks associated with meeting up with people they have only met online. A young lesbian, gay, bisexual or transgender person will naturally want to meet other lesbian, gay, bisexual or transgender people with similar

experiences, and they will seek friends they can relate to and a community where they can be themselves. This can make them particularly vulnerable in an online environment. It's essential that they understand that healthy friendships are based on mutual respect and trust and where to turn for further advice and support. For more information visit www.stonewall.org.uk to speak with someone call 0800 050 2020.

Children with disabilities also use the online world to meet others and at times hide their disability in order to make friends and build relationships. People who pose on line as children may target disabled children and young people.

Remember that The FA's equality team has more information about tackling homophobia in football, email equality@TheFA.com or visit www.TheFA.com/equality

5.4.3 Taking a proactive approach

- Ensure The FA's definition of bullying and its anti-bullying policy are promoted
- Ensure your club or league has codes of conduct of which an anti-bullying policy is a part; why not make use of The FA's Respect Codes of Conduct?
- Ensure that you take all signs of bullying seriously
- Raise awareness of what discriminatory bullying is and how your club or league will respond
- Develop an open environment that encourages children and young people to share their concerns; why not introduce a young person's forum into your club or league?

- Ensure you have someone regularly monitoring your club website and social networking sites

Remember that it is not the responsibility of an individual to decide that bullying is or is not taking place in football, but it is their responsibility to act on any concerns. If your club or league signs up The FA's Respect Programme then measures should be in place to seek to prevent bullying if everyone is adhering to their Respect Code.

Download further information on developing an anti-bullying policy via – www.TheFA.com/~media/files/thefaportal/governance-docs/safeguarding/raising-awareness/the-fa-anti-bullying-policy-for-clubs-2012.ashx



5.5 Reducing the potential for vulnerability

Bearing in mind that children and young people can be and are disadvantaged by these and other experiences, it is important for all clubs, leagues and County FAs to be extra vigilant in creating a safe culture, including:

- Finding ways of understanding and communicating with all children and young people
- Ensuring best practice at all times in physical and health care
- Developing knowledge of the diverse cultures they serve
- Respecting cultural differences
- Promoting positive environments and behaviours in which difference (in a variety of senses) is embraced
- Building relationships with parents and carers and including all families in club activities
- Observing carefully changes in mood, appearance and behaviour and discussing those concerns with families, carers or the Welfare Officer if suspicions or concerns are significantly aroused about the care of the child or young person
- Acknowledging that disabled children and young people are additionally vulnerable and that vigilance is essential
- Acknowledging that abusive behaviour directed towards a minor whilst they are carrying out a leadership role is not acceptable and will be reported to the appropriate designated person as poor practice and or abuse

- Raising awareness of what discriminatory bullying is, how you will respond and ensure effective reporting systems are in place to enable members to report incidents
- Implementation of a club code of conduct for spectators and players
- Acceptance of the special role club officials have in setting a good example of the way in which people should behave towards children and young people in leadership roles.

It may be necessary to ask other specialist agencies for help and advice in including some children and young people in football. It should be seen as a strength of the club and league to approach families, Education, Health, Social Care, voluntary agencies and community groups for advice on including and protecting particular children.

The mentoring of young match officials is particularly helpful in supporting them if they are faced with abusive behaviour and indeed preventing the continuation of such behaviour. The mentors role is to support, assist and help the young referee develop their confidence and offer effective guidance. They can offer support should the young referee be subjected to abusive side-line behaviour and be on hand to prevent this. It's vitally important the mentor ensures the referee is able to enjoy the game as much as the players. Further information can be obtained via The FA's Referees Department 0800 169 1863.

It's recognised that empowering children and young people helps to protect them; ensure your club or league is effectively communicating with its young members and listening to their needs and suggestions for change. The FA provides safeguarding guidance for children and young people; this can be viewed via – www.TheFA.com/football-rules-governance/safeguarding/be-on-the-ball



Section 6

6.0 Responding to concerns, allegations and disclosures*

*The term disclosure in this context is used to describe the sharing of child protection concern(s) by one individual to another and not the Disclosure Barring Service formal record of an individual's relevant convictions.

There is a moral responsibility to report any concerns about a child or young person in any context. The FA will support anyone who, in good faith, reports his or her concern that a colleague is, or may be, abusing a child or young person, even if that concern is proved to be unfounded. The following guidelines are relevant whether or not the child or young person is involved in football. It is essential that you follow The FA procedures for any concerns that are related to football settings.

Concerns may arise because:

- A child or young person informs you directly that he or she is concerned about someone's behaviour towards them
- You become aware, through your own observations or through a third party, of possible abuse occurring.

Most suspicions of abuse come about from observation of changes in the child or young person's behaviour, appearance, attitude or relationship with others. Your suspicions may develop over time (see Appendix 6 Signs and Indicators of Abuse). Where the concern does not involve individuals in football settings, the matter should be reported directly to local Children's Social Care or the local Police.

6.1 What to do if a child or young person discloses to you

If a child or young person informs you directly that they are concerned about someone's behaviour towards them, this is known as a disclosure. A disclosure may be given slowly over time or all at once and it may seem incomplete, unclear and may sometimes be retracted. Children don't often tell in one simple 'disclosure'.

The person receiving the disclosure should:

- React calmly so as not to frighten the child or young person
- Ensure the immediate safety of the child or young person
- Tell the child or young person that he or she is not to blame and that he or she was right to tell
- Take what the child or young person says seriously
- If the child or young person needs immediate medical treatment, take them to hospital or telephone for an ambulance, inform doctors of concerns and ensure that they are aware that this is a child protection issue as it is their responsibility to refer this on appropriately to the Police or Children's Services
- When speaking with the child or young person keep any questions to the absolute minimum. Ask only what is necessary to ensure a clear understanding of what has been said
- Re-assure the child or young person but do not make promises of confidentiality or outcome, which might not be feasible in the light of subsequent developments

- In the event of suspicion of sexual abuse try to avoid the child bathing or showering until given permission to do so. Washing can destroy valuable evidence
- Take a detailed written record of what the child said to you
- As soon as the child or young person completes the disclosure make sure you accurately record what they said using their language and of any actions you may have taken as a result
- Inform the parents/carers immediately unless you have a specific reason not to, e.g. the child has named the parent/carer as the abuser. If this is the case then contact the Welfare Officer. If they are unavailable contact local Children's Social Care or the Police for guidance.

6.2 The FA's reporting procedures

Whether informed directly by a child or young person, via a third party, or through your own observations within a football setting, you should follow The FA Procedures outlined below and in the flow diagrams on pages 37, 38 and 39.

- Ensure the immediate safety of the child or young person
- If the child or young person needs immediate medical treatment, take them to hospital or telephone for an ambulance, inform doctors of concerns and ensure that they are aware that this is a child protection issue
- Report the concerns to the designated person for child protection or the person in charge immediately, unless the concern is about this individual

- If the designated person is not available, or the concern is about this person, report your concerns directly to the local Children's Social Care, the local Police or the NSPCC Child Protection Helpline
- If the child has a disability or extra communication needs share the needs with the people you report to so they can communicate effectively with the child or young person
- These agencies will advise you whether a formal referral to Children's Services is necessary and what further action you might need to take. If you are advised to make a formal referral make it clear to Children's Social Care or the Police that this is a child protection referral
- All Police forces have dedicated Child Protection Teams (CPTs) which deal with allegations of abuse within the family setting and by people in a position of trust. In a real emergency dial 999 to involve the full squad
- Remember if the concern is about someone involved within a football setting and you are unable to contact the Welfare Officer in your club/league or CFA, then you should also inform The FA's Safeguarding team on 0800 169 1863 Extension 6300 or 6400 or via email on safeguarding@TheFA.com and let them know what action, in line with FA procedures, you have taken.
- The flow diagrams on pages 37-38 explain how to deal with a concern about possible poor practice and or child abuse within a football setting. The following definitions on page 36 will help you to decide whether the issue is likely to be poor practice or abuse. If you are at all unsure make sure you seek guidance from your club or league Welfare Officer or CFA Welfare Officer as appropriate.

- If you decide the concern relates to poor practice follow flow diagram 1 on page 37. If you decide that the concern relates to abuse use flow diagram 2 on page 37. If you decide that the concern relates to concerns outside of a football setting use flow diagram 3 on page 38.

6.2.1 Dealing with possible poor practice and/or abuse in a football setting

You become aware of a poor practice and/or possible abuse situation.

- Stay calm
- If child or young person is present reassure him or her they are not to blame
- Don't make promises of confidentiality or outcome
- Keep questions to a minimum
- Is the concern poor practice or child abuse?
- Write down what the child has said using their words and phrases or the signs and gestures they used

For clarification concerning poor practice concerns see page 37. If the concern is child abuse follow flow diagram 2 on page 38. If you are not sure talk to the designated person and ask their advice, if the concern is poor practice:

Contact the CWO who will either:

- Follow club procedures for a first report of poor practice, complete and submit The Affiliated Football referral form to the CFA WO for information only
- Seek advice from the CFA WO

Where appropriate the CFA WO will either:

- Give advice for the CWO to action
- Monitor the behaviour of individual or club as required
- Gather additional evidence
- Refer concerns to The FA's Safeguarding team for advice

Where deemed appropriate, contact will be made with and action taken by:

- CFA Disciplinary Committee
- CFA FDO or CDM
- YLWO

Possible outcomes:

- Further information requested
- Advice/warning as to future conduct/sanctions
- Further training/support needed
- No case to answer
- Referral to FA's Safeguarding team for action
- All appeals regarding County FA decisions will be dealt with via CFA complaints procedures*

(*refer to the current FA Handbook)

6.2.2 Distinguishing between child abuse and poor practice

Concerns identified as child abuse will fall within the following five categories:

Physical Abuse; A child is physically hurt or injured by an adult or an adult gives alcohol or drugs to a child or young person

Neglect; A child's basic physical needs are consistently not met or they are regularly left alone or unsupervised

Sexual Abuse; An adult or peer uses a child or young person to meet their own sexual needs

Emotional Abuse; Persistent criticism, denigrating or putting unrealistic expectations on a child or young person

Bullying; Persistent or repeated hostile and intimidating behaviour towards a child or young person.

Incidents of poor practice occur when the needs of children and young people are not afforded the necessary priority, so that their welfare is compromised.

For example:

- When insufficient care is taken to avoid injuries (e.g. by excessive training or inappropriate training for the age, maturity, experience and ability of players)
- Giving continued and unnecessary preferential treatment to individuals and regularly or unfairly rejecting others (e.g. singling out and only focusing on the talented players and failing to involve the full squad)

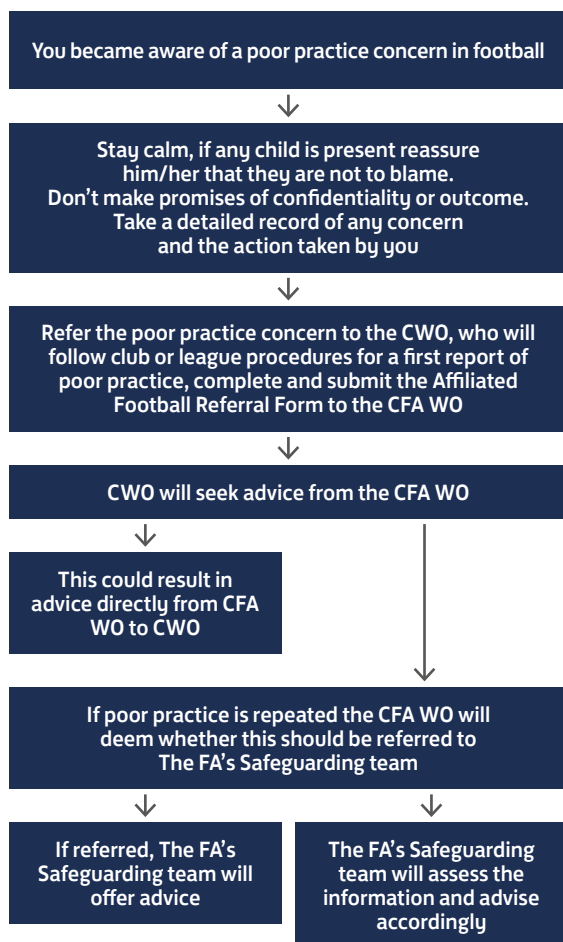
- Placing children or young people in potentially compromising and uncomfortable situations with adults (e.g. changing in a 1:1 situation with a young referee)
- Allowing abusive or concerning practices to go unreported (e.g. a coach who ridicules and criticises players who make a mistake during a match)
- Ignoring health and safety guidelines (e.g. allowing young players set up goal posts unsupervised by adults)
- Failing to adhere to the club's codes of practice (e.g. openly verbally abusing the referee)
- When a child's impairment related needs have not been taken into account

There is evidence which indicates that some children and young people have experienced what may be referred to as 'initiations more commonly now referred to as 'hazing' into a sports club or team; often a historical practice which may have been started with good intentions but can result in oppressive, intimidating and abusive behaviour. Hazing; is any action or situation, with or without the consent of the children and young people, which recklessly, intentionally, or unintentionally endangers the mental, physical, or emotional wellbeing of a child or young person. Reported concerns of hazing will be taken seriously and appropriate actions taken.

Please note:

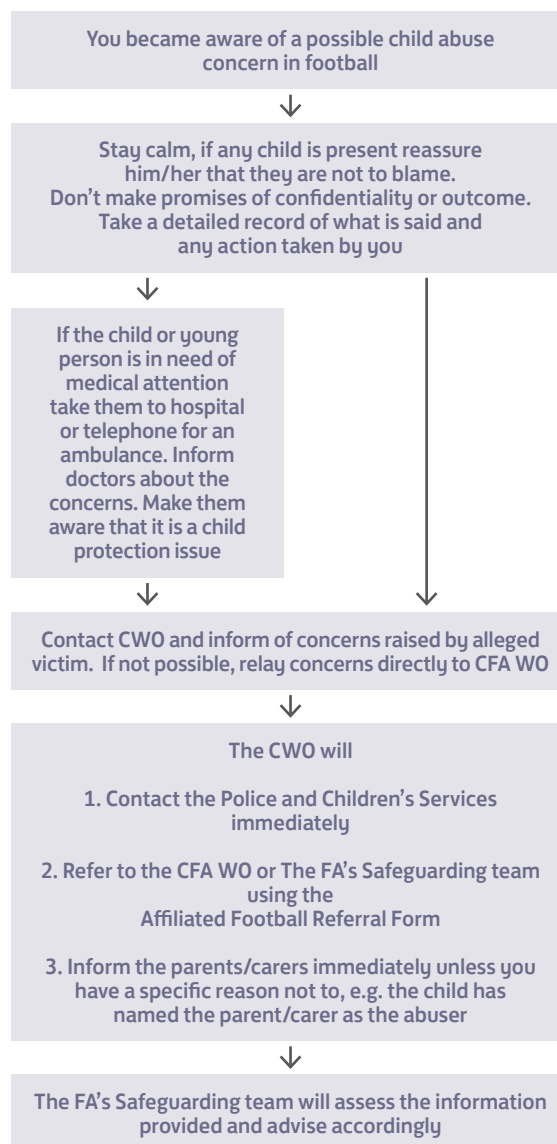
- The assessment about whether an incident is one of child abuse or poor practice (or hazing) may not be able to be made at the point of referral, but only after the collation of relevant information
- The majority of poor practice concerns can be dealt with by the club or alternatively with support and guidance from the County FA
- All child abuse will be dealt with by The FA (in conjunction with the statutory agencies) and with the support of the County FA
- For further clarification concerning abuse concerns see Appendix 6.

6.2.3 Flow diagram 1: dealing with possible poor practice in a football setting



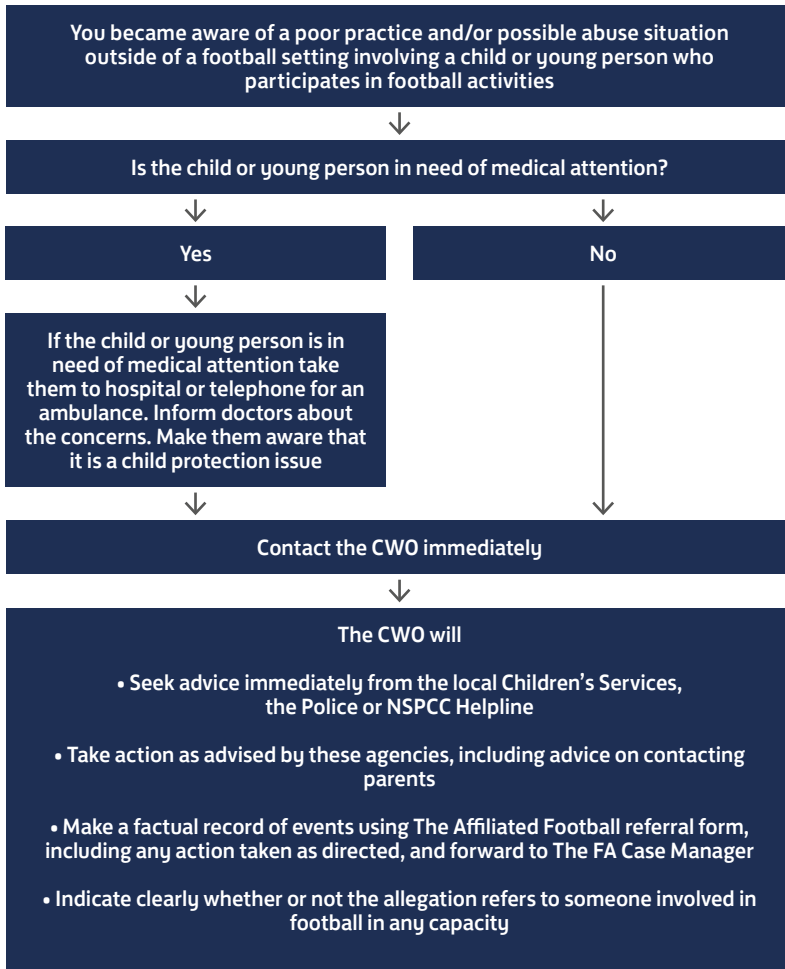
NB If the designated person is not available, or the concern is about this person, report your concerns directly to The FA Safeguarding team

6.2.4 Flow diagram 2: dealing with possible child abuse in a football setting



NB If the designated person is not available, or the concern is about this person, report your concerns directly to the local Children's Social Care, the local Police or the NSPCC Child Protection Helpline

6.2.5 Flow diagram 3: dealing with concerns outside of a football setting



NB If the designated person is not available, or the concern is about this person, report your concerns directly to the local Children's Social Care, the local Police or the NSPCC Child Protection Helpline

6.2.6 Concerns outside of a football setting

You may receive information regarding the welfare of a child or young person who is involved in football, yet the concern itself does not relate to someone within the game. In these circumstances (e.g. the concern relates to the child's home or a social setting other than football) you need to follow The FA Procedures outlined below:

- Follow the guidance on page 34 if the child or young person informs you directly
- If your concerns are via a third person or through observation, report your concerns directly to the CWO
- If you are unable to contact the CWO immediately or the CFA WO refer your concerns directly to local Children's Social Care or to the local Police
- These agencies will advise you whether a formal referral to Children's Social Care is necessary and what further action you might need to take. If you are advised to make a formal referral make it clear to Children's Social Care or the Police that this is a child protection referral
- Make a factual record of events using 'The Affiliated Football Referral Form' including any action as directed, indicating clearly whether or not the allegation refers to someone involved in football. Forward this to The FA Case Manager.

6.3 Recording of suspicions, concerns or events

- Accurate recording is essential, as there may be legal proceedings at a later date. Referrals to Children's Social Care or Police should be confirmed in writing within 24 hours - if not, then at the earliest opportunity
- Keep a record of the name and designation of the Children's Social Care member of staff or Police Officer to whom concerns were passed and record the time and date of the call in case any follow-up is needed
- Ensure all information is maintained safely in accordance with data protection legislation
- Information should only be shared on a strictly 'need to know' basis
- Complete Appendix 7 (Affiliated Footballs Referral Form) and send this to the CFA WO. The CFA WO in turn will send this onto The FA's Safeguarding team.

Section 7

7.0 The FA safeguarding team

In case of child abuse or alleged child abuse, The FA's Safeguarding team will:

- Complete an initial assessment on the alleged perpetrator and take any action required to safeguard children, pending further Police and Children's Social Care inquiries
- Assess all individual cases under the appropriate FA misconduct and disciplinary procedures, irrespective of the findings of the Children's Social Care or Police inquiries
- Decide whether the nature of the concerns need to be dealt with by The FA Disciplinary Commission
- Support all Welfare Officers in carrying out their role and responsibilities
- Inform individuals when they are the subject of a child protection concern and provide a point of contact to keep the alleged perpetrator informed of proceedings
- Decide and advise on any contact with the media
- Monitor the types and volume of poor practice and child abuse referrals and utilise this information to inform its educational programmes and develop The FA referral process
- Decide whether a member of staff or volunteer can be reinstated and how this can be handled sensitively.

Decisions about reinstatement may be difficult. The FA, advised by the Police and Children's Social Care and/or the NSPCC, will reach a decision based upon the available information. This could suggest that, on a balance of probability, it is more likely than not that the allegation is true, regardless of any decisions relating to criminal prosecutions. The welfare of children and young people should always remain paramount. NB. The FA is entitled to carry out its own investigations independently of the Police and Children's Social Care and does so regularly where it believes this is necessary.

7.1 Possible outcomes

Cases of poor practice will be investigated by the CFA and may be subject to CFA disciplinary procedures. Cases of child abuse (having been dealt with by the statutory agencies) will be investigated by The FA's Safeguarding team who may refer the case to The FA Safeguarding Review Panel. In these circumstances, the following outcomes are possible:

- No case to answer
- Advice and or warning as to future conduct
- Further support or training
- Supervision and or monitoring
- Suspension.

7.2 "Whistle-blowing"

Whistle-blowing can be used as an early warning system or when it's recognised that appropriate actions have not been taken. It is about revealing and raising concerns over misconduct or malpractice within an organisation or within an independent structure associated with it.

Any adult or young person with concerns about a colleague can also use whistle-blowing by contacting The FA's Safeguarding team on **0800 169 1863 Extension 6300 or 6400** or via email on safeguarding@TheFA.com. Alternatively you can go direct the Police or Children's Social Care and report your concerns there.

7.3 Appeals

The appeals procedure is available to anyone who is subject to a decision made by The FA Safeguarding Review Panel or the Head of Judicial Services. Every individual and organisation wishing to appeal against decisions by The FA must do so in writing, to be received by The FA Head of Judicial Services, The Football Association, Wembley Stadium, PO Box 1966, London SW1P 9EQ within 14 days of the date of notification of the decision appealed against. The appeal must identify the specific decision(s) being appealed and set out the grounds of appeal and the reasons why it would be substantially unfair not to alter the decision. A fee of £100.00 must be enclosed with the appeal. The FA Disciplinary Appeal Panel will exclude anyone who sat on the initial decision-making panel and will consist of an independent Chair and two other members. Further information regarding The FA Appeals Procedure can be downloaded via – www.TheFA.com/~media/files/thefaportal/governance-docs/rules-of-the-association/2014-15/031e_disciplinary-procedures---appeal-regulations.ashx