

LONDON CITY LIONESSES

Professional Game Academy Safeguarding Policy

Version	Review Date	Owner	Approval	Date of Approval	Date of next review
1.0	January 2025	Designated Safeguarding and Player Care Lead	LCL Board	January 2025	January 2027

SECTION A – INTRODUCTION AND SCOPE

A1. Introduction and scope

The Club acknowledges its responsibility to safeguard Academy Players and is committed to ensuring the safety and wellbeing of all Academy Players.

The Club's Academy is split into two user groups:

- The Professional Game Academy for players at the U21 and U16 age groups; and
- The Academy for players at the U14 and U12 age groups.

This Policy specifically applies to the Professional Game Academy and those classified as children (i.e. those under the age of 18) and/or vulnerable adults.

Safeguarding within the Academy structure involves the Professional Game Academy Players ("Academy Players"), their parents/carers ("Parents") and Club personnel associated with the Academy (whether employed/retained directly to work within the Academy or being a wider part of our Club including those that may volunteer to assist in the Academy) ("Academy Staff").

This Policy applies to all activities run or managed by the Club whether they are undertaken at the Academy or at any other venue.

A2. Safeguarding aims

We will promote good safeguarding practice within the Academy and the wider Club with the following aims:

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- Provide Academy Players with appropriate safety and protection whilst involved with the Club.
- Ensure that there are healthy relationships with appropriate boundaries.
- Educate Academy Players, Parents and Academy Staff in relation to safeguarding and safeguarding processes.
- Prevent bullying, harassment, intimidation and other forms of abuse.
- Prevent discrimination.
- Enable all involved with the Academy to make informed and confident responses relating to specific safeguarding issues.
- Ensure that the recruitment of Academy Staff is carried out in a safe and responsible manner with appropriate safeguarding checks.
- Provide routes to raise concerns and complaints.

This Policy should be read in conjunction with the Academy Code of Conduct which cover issues such as bullying and harassment in further detail.

A3. Safeguarding Academy Players

We support The Football Association's Safeguarding Children - Policy and Procedures and endorse and adopt the Policy Statement contained in that document.

The key principles of The FA Safeguarding Children Policy are that:

- The child's welfare is, and must always be, the paramount consideration.
- All children, vulnerable persons and all individuals have a right to be protected from abuse regardless of their age, gender, disability, culture, language, racial origin, religious beliefs or sexual orientation.
- All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately.
- Working in partnership with other organisations, children and young people and their parents/carers is essential.

A4. Abuse and Unacceptable Behaviour

The Club does not tolerate abuse or unacceptable behaviour. Abuse is broadly defined under relevant legislation and in relation to the Academy it could include:

- Neglect: Including ignoring medical or physical care needs.
- Self-neglect: Including neglecting to care for one's personal hygiene or health.
- Abuse occurring in the home: Including psychological, physical, sexual, financial and emotional abuse.

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- Discrimination: which centres on a difference or perceived difference particularly with respect to race, gender or disability or any of the protected characteristics of the Equality Act (2010).
- Organisational abuse: Including neglect and poor care practice.
- Physical abuse: including hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions.
- Emotional or psychological abuse: Including threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, or isolation.
- Sexual abuse: Including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo.
- Financial abuse: Including theft, fraud or coercion in relation to someone's financial affairs or arrangements.
- Cyber bullying / online abuse: Including repeatedly making fun of another person online or repeatedly picking on another person through emails or text messages.
- Modern slavery: Encompasses slavery, human trafficking, forced labour and domestic servitude.

Where the abuse/unacceptable behaviour includes a child or vulnerable adult there may be a safeguarding concern which you should report in accordance with this Policy.

A5. Recognition – signs of possible abuse

Every Academy Player is unique, so behavioural signs of abuse will vary from person to person. In addition, the impact of abuse is likely to be influenced by the Academy Player's age, the nature and extent of the abuse, and the help and support the Academy Player receives. However, there are some behaviours that are commonly seen in children and vulnerable persons who have been abused:

- The person appears distrustful of a particular adult, or a parent or a coach with whom you would expect there to be a close relationship.
- The person has unexplained injuries such as bruising, bites or burns, particularly if these are on a part of the body where you would not expect them.
- The person has an injury which is not explained satisfactorily or properly treated.
- A deterioration in the person's physical appearance or a rapid weight gain or loss.
- Pains, itching, bruising or bleeding in or near the genital area.
- A change in the person's general behaviour. For example, they may become unusually quiet and withdrawn or unexpectedly aggressive. Such changes can be sudden or gradual.

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- If the person refuses to remove clothing for normal activities or wants to keep covered up in warm weather.

SECTION B – ACADEMY PLAYERS

B1. Reporting Concerns

If you have any safeguarding concerns about the way in which you have been treated or about one of your fellow Academy Players you can report those concerns in the following ways:

- Through your parent/carer – if you feel able to, please speak to your parent or carer so that they can help support you in raising the concern with the Club.
- To the Club’s Designated Safeguarding Officer (“DSO”) safeguarding@londoncitylionesses.com
- [Through the “MyConcern” QR Codes displayed at the training ground which will allow a report to be filed with the DSO.](#)
- If you feel unable to report the issue within the Club’s structure you may contact The FA by calling 0800 169 1863 and asking for the Safeguarding Team or via email to: safeguarding@thefa.com
- Serious concerns can be reported to Children’s Social Care, or the NSPCC Helpline on 0808 800 5000.
- If you have a concern about someone’s immediate safety call 999 and speak to the police.
- If anyone needs immediate medical treatment which cannot be provided by the Club, please call an ambulance.

SECTION C – PARENTS AND CARERS

C1. Football Guidance for Parents and Carers

The Football Association issues guidance for parents and carers on safeguarding which can be accessed via the following link.

<https://www.thefa.com/football-rules-governance/safeguarding/section-8-parents-and-carers>

The Women’s Professional Game Academy release guidance for Parents and Carers on a season by season basis. If for any reason you have not received this guidance document please contact the Academy Manager via academy@londoncitylionesses.com to receive a copy.

Parents are encouraged to read all guidance issued by the football authorities.

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C2. Use of Agents

An agent may only approach and/or act on behalf of an Academy Player after the 1st January in the academic year in which the Academy Player turns 16. An agent cannot be paid in relation to the PGA Registration. An agent can only be paid in relation to a Professional Contract and only once that Professional Contract has come into force.

An agent can be beneficial to a player but only at the right time.

If you are concerned about any approaches made by an agent to your daughter or Academy Player within your care please report this concern as set out in Section C3 below.

C3. Reporting Concerns

We support the need to have in place a reporting mechanism to reveal and raise concerns over misconduct or malpractice within our organisation.

If you are worried, then taking no action is not an option. Do not assume that someone else will help or report the issue.

Behaviour that might be considered as inappropriate will often depend on the circumstances. A lower-level concern may not be seen as immediately dangerous or intentionally harmful, but it can soon escalate and become a serious concern. The risk in not receiving reports of low-level concerns when they arise is that behaviour cannot be addressed as soon as possible. Potentially, situations could escalate and adversely affect those involved. Although low-level concerns will often occur through a misunderstanding or lack of awareness, some behaviour may be intended to enable abuse at a later stage.

Having an awareness and culture of safeguarding issues within the Club allows us to act promptly as soon as concerns are brought to our attention. This can include correcting behaviour through education, or where necessary removing an individual from their role.

If you have any safeguarding concerns about the way in which your daughter or Academy player within your care has been treated or if you see other safeguarding concerns within our Academy you can report these concerns in the following ways:

- In relation to any unwanted approach made by an agent to the Club's Designated Safeguarding Officer ("DSO") safeguarding@londoncitylionesses.com and to The FA footballagentqueries@thefa.com
- In relation to any general safeguarding concern within the Academy to the Club's DSO safeguarding@londoncitylionesses.com

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- [Through the “MyConcern” QR Codes displayed at the training ground which will allow a report to be filed with the DSO.](#)
- If you feel unable to report the issue within the Club’s structure you may contact The FA by calling 0800 169 1863 and asking for the Safeguarding Team or via email to: safeguarding@thefa.com
- Serious concerns can be reported to Children’s Social Care, or the NSPCC Helpline on 0808 800 5000.
- If you have a concern about someone’s immediate safety call 999 and speak to the police.
- If anyone needs immediate medical treatment which cannot be provided by the Club, please call an ambulance.

C4. Good Practice Guidelines

All Parents are expected to demonstrate good behaviour to help support their daughter / Academy Player in their care and to help promote a safe environment and positive culture within the Academy. Parents should:

- demonstrate good touchline behaviour;
- respect Academy Staff;
- not “sideline coach” your daughter or other Academy Players;
- not verbally abuse referees, opposition players, your daughter or other Academy Players;
- not overreact to match outcomes;
- not access the field of play or training area;
- report any poor behaviours that you witness to your daughter’s coach or if you believe that there is a safeguarding issue to safeguarding@londoncitylionesses.com;
- consider signs of your daughter / Academy Player in your care acting out of character or becoming withdrawn;
- support and encourage your daughter / Academy Player in your care when a training session or match has not gone well for them;
- support the healthy lifestyle of your daughter / Academy Player in your care;

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- support your daughter's / Academy Player in your care's Educational Individual Development Plan and the relationship between the Club and your daughter's / Academy Player in your care's educational establishment;
- discuss any medical, injury, illness or allergies with the Academy Medical Staff to ensure that your daughter / Academy Player in your care can receive appropriate medical treatment if required; and
- only provide lifts to other Academy Players with the consent of that Academy Player's Parent.

SECTION D - ACADEMY STAFF

D1. Reporting Concerns

We support the need to have in place a reporting mechanism to reveal and raise concerns over misconduct or malpractice within our organisation.

If you are worried, then taking no action is not an option. Do not assume that someone else will help or report the issue.

Behaviour that might be considered as inappropriate will often depend on the circumstances. A lower-level concern may not be seen as immediately dangerous or intentionally harmful, but it can soon escalate and become a serious concern. The risk in not receiving reports of low-level concerns when they arise is that behaviour cannot be addressed as soon as possible. Potentially, situations could escalate and adversely affect those involved. Although low-level concerns will often occur through a misunderstanding or lack of awareness, some behaviour may be intended to enable abuse at a later stage.

Having an awareness and culture of safeguarding issues within the Club allows us to act promptly as soon as concerns are brought to our attention. This can include correcting behaviour through education, or where necessary removing an individual from their role.

If you have any safeguarding concerns within the Academy you can report these concerns in the following ways:

- In relation to any general safeguarding concern within the Academy to the Club's DSO safeguarding@londoncitylionesses.com
- [Through the "MyConcern" QR Codes displayed at the training ground which will allow a report to be filed with the DSO.](#)
- If you feel unable to report the issue within the Club's structure you may contact The FA by calling 0800 169 1863 and asking for the Safeguarding Team or via email to: safeguarding@thefa.com

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- Serious concerns can be reported to Children’s Social Care, or the NSPCC Helpline on 0808 800 5000.
- If you have a concern about someone’s immediate safety call 999 and speak to the police.
- If anyone needs immediate medical treatment which cannot be provided by the Club, please call an ambulance. If this is not possible and/or an ambulance is unavailable, take the individual to a hospital and ensure that there are two responsible adults to accompany the Academy Player.

D2. Good Practice Guidelines

All Academy Staff must: (i) demonstrate exemplary behaviour to safeguard Academy Players, adults at risk and all other individuals, and (ii) report any concern both in the best interests of the Academy Players, adults at risk and all individuals as well as to protect themselves from allegations.

Examples of Good Practice

The following are examples of how we expect Academy Staff to create a positive culture within the Academy:

- Promptly respond to any request to complete or update your Disclosure and Barring Service Checks.
- Ensure that you carry out any training which is required by the Club.
- Promptly inform the Head of People and Culture and the DSO if you are subject to any investigation, allegation or arrest which may impact your role in working with the Academy.
- Work in an open environment, for example, avoid private or unobserved situations and encourage transparency in communication.
- Treat all Academy Players equally and with respect and dignity.
- Put the welfare of the Academy Player first in all instances.
- Avoid any “intimate relationship” with any Academy Player. For further information please see the Club’s which is prohibited by the Club under the Relationships at Work Policy.
- Never take advantage of a position of trust, control, or responsibility for those in your supervision, care, support, or coaching environment.

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- Make football fun, enjoyable and promote fair play.
- Keep up to date with the technical skills and qualifications in football to the appropriate level.
- Be vigilant and ensure adults around Academy Players act in accordance with the standards set by the club. Club personnel are also responsible to monitor those who enter changing rooms.
- Ensure that appropriate club personnel ratios are planned and maintained.
- Ensure that at tournaments or residential events you do not enter the rooms of Academy Players except with another adult or in the case of an emergency.
- Be an excellent role model – this includes not smoking, not drinking excessive amounts of alcohol, not using drugs, or not using bad language in the company of Academy Players.
- When coaching, give enthusiastic and constructive feedback recognising the development needs.
- Secure Parent consent in writing to act, if the need arises, in emergency circumstances to give permission for the administration of medication or emergency treatment.
- Obtain Parent consent in writing for taking photographs and/or video of any Academy Player (including video of training sessions) and provide information on how such footage is to be used.
- Keep a written record of any injury or incident that occurs, along with the details of any treatment given and/or action taken and advise Parents and the DSO on any issue in relation to any treatment of any Academy Player and to log such details on an incident/accident report form.
- Request written Parent consent if club personnel are required to transport children or adults at risk in club vehicles. Transporting vulnerable persons in club members' personal vehicles should be avoided unless necessary.

Examples of Unacceptable Practice

The following should be avoided. If cases arise where these situations are unavoidable (e.g. because of an emergency), they should only occur with the full knowledge and consent of either the Parent or someone in a position of authority within the Club or Academy structure.

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- Avoid taking an Academy Player to their own home where they will be alone (unless over the age of 18).
- Avoid taking an Academy Player to your home where they will be alone with you.
- Academy Staff should never share a room with any Academy Player.
- Do not allow allegations made by an Academy Player to go unacknowledged, unchallenged, unrecorded, or not acted upon.

D3. Coaching Contact

If any form of manual/physical contact is required between a member of Academy Staff and an Academy Player, it should be provided openly and in line with coaching guidelines. In particular you must consider the following:

- Explain the type of/reason for physical contact.
- Unless it is an emergency, ask for permission before any physical contact (e.g. to demonstrate a particular football technique).
- Unless specifically and essentially required for emergency first aid care, contact must not involve touching genital areas, buttocks, breasts or any other part of the body that might cause an Academy Player distress or embarrassment.
- Physical contact should never be used as a punishment.
- Physical contact should always take place in an open or public environment and not take place in secret or out of sight of others. Where essential treatment or emergency first aid provided by the designated first aider takes place away from the rest of the group for confidentiality and privacy reasons, at all times, the first aider should ensure another responsible adult is present for the duration.
- Physical contact should be culturally sensitive.

SECTION E – SAFE RECRUITMENT

In line with our Equal Opportunities Policy, we recruit on the basis of merit, against objective criteria that avoid discrimination.

Through our “safe recruitment process”, we take all reasonable steps to create a safe environment for children and adults at risk and ensure that the right people work in our Club. This will include:

- Developing a role profile / person specification – to describe the tasks, duties and responsibilities of the role and the skills, experience and attributes the role

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requires. This will include specific experience of working with children, being child-centred and necessary sport or other qualifications.

- Advertising the role – we will advertise the role to try and attract a wide candidate pool and to demonstrate an open recruitment process. The advert will indicate whether the role involves working with children, and/or adults at risk and where appropriate, that a self-declaration, references and a DBS check to the correct level is required.
- Completing an application process - to help inform any subsequent interviews and identify any gaps in employment/volunteering history. This may include self-declaring relevant convictions/investigations and consent for appropriate record checks.
- Interviewing candidates – with appropriate Club representatives (ordinarily at least two). Where the role involves working with children or adults at risk, we will ask questions that gauge the candidate’s knowledge of safeguarding to assess their suitability for the role.
- Obtaining written references: We will obtain at least two written references, including (where appropriate to the role) information on the candidate’s previous work with children or adults at risk.
- Requesting identification documents - The club will ensure the candidates identity, qualifications and right to work in the UK are checked prior to appointment.
- Checking Criminal Records - We will ensure a Disclosure and Barring Service (“DBS”) check of the correct level is carried out if a person is selected for a role. Most roles within our club will qualify for a DBS check, and the level of check will depend on the individual’s role. Eligibility for a DBS Check is governed by legislation. In brief this means a DBS Check is required for anyone aged 16 years or over who undertakes any potentially unsupervised activity working directly with children and young adults under the age of 18.

If there are concerns regarding the appropriateness of an individual who is already involved or who has approached us to become part of our club, guidance will be sought from the Club’s DSO and if appropriate the County FA/The FA and/or the Women’s Professional League Limited.

SECTION F – COMPLAINTS AND INVESTIGATIONS

F1. Investigations and disciplinary matters

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The DSO will obtain written details of the concern/allegation and record information about the times, dates and locations of any alleged incidents along with details of any potential witnesses.

A risk management plan will be created to protect any Academy Player at potential risk.

If required the DSO will refer the matter to The Kent County FA, The FA, police and/or other statutory authorities as needed if there is a possible criminal offence.

Where appropriate, the Club may instruct external investigators and/or experts to assist with any safeguarding issues on its behalf.

F2. Consequences of breach

(a) Academy Players

If following an investigation you are found to have breached this Policy, the DSO (in consultation with other appropriate members of the Academy and/or the Club will consider whether your Registration with the Club should be cancelled.

(b) Academy Staff

If the allegation is made against a member of Academy Staff, consideration will be given as to whether any disciplinary action is needed and if so the Club will follow its Disciplinary and Capability Policy (where the individual is an employee) or other relevant procedures if the individual is not an employee (for example a consultant or volunteer). This may include the need to suspend the Academy Staff from work whilst an investigation or disciplinary procedure (or both) is carried out.

Failure to report a safeguarding incident/concern, covering up a safeguarding incident/concern, and/or not engaging in any investigatory process when asked to do so, will all be considered to be breaches of this Safeguarding Policy which may result in disciplinary action.

In cases of gross misconduct, the Club may dismiss the employee without warning, with no notice or payment in lieu of notice (summary dismissal). The Club may cancel the contract of any consultant and/or ask a volunteer to leave their position for any disciplinary issues.

The Club is permitted to make a referral to the Disclosure and Barring Service and/or any other bodies such as the police in any circumstances where it is necessary to do so, including dismissal for gross misconduct.

(c) Parents

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If you breach this Policy, the Club will need to consider whether it is appropriate for your daughter / Academy Player within your care to continue to participate in the Academy.

The Club is permitted to make a referral to the Disclosure and Barring Service and/or any other bodies such as the police in any circumstances where it is necessary to do so.

F3. Record keeping

Where the issue involves an employee, the Club will keep a clear and comprehensive summary of the case record on the individual's confidential personnel file including details of how the allegation was followed up and resolved, the decisions reached, and the action taken.

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

SECTION G – FURTHER INFORMATION

G1. Further contact details

Further advice on Safeguarding can be obtained from:

Kent Football Association Safeguarding (in relation to issues involving Academy Players or Staff)

01622 792140

safeguarding@kentfa.com

The Football Association

<http://www.thefa.com/football-rules-governance/safeguarding>

safeguarding@thefa.com

0845 210 808

Childline offers free, confidential advice and support whatever your worry, whenever you need help - **0800 1111**.

G2. Associated policies and procedures

The following policies have either been referred to in this Policy and/or are relevant to procedures associated with this Policy and should be reviewed for relevant information:

- Unacceptable Behaviour Policy

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- Academy Safeguarding Policy
- Equal Opportunities Policy
- Relationships at Work Policy
- Disciplinary and Capability Policy
- Raising Concerns Policy