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# A COLLABORATIVE APPROACH TO NEVER-ENDING WORK

When we published our first safeguarding strategy – Building an Ever-Safer Culture – in February 2022, we knew three things:

Firstly, that we had specific objectives we wanted to achieve over the strategy's three-year term.

Secondly, that we wouldn't gain or achieve tangible positive change without working in collaboration with football's other lead bodies in England. That's why the bedrock of all our work is the united ethos and commitment of ourselves, the professional men's and women's leagues, the Professional Footballers' Association, the League Managers Association, the Professional Game Match Officials Limited, the County FAs and National Schools Associations.

Thirdly, we knew our long-term strategy work would have no end. The importance of safeguarding is an ever-present at every level of football, is everyone's responsibility and requires constant vigilance.

I'm pleased to report that, as this Year 2 Review and Report demonstrates, we are making significant progress across all our five focus areas and strategic goals. Here are three topline workstreams I want to highlight:

- Standards: Every County FA, Premier League and EFL Club must undergo
  independent assessments against set Safeguarding Standards and I'm delighted
  to say that the feedback from the relevant assessors demonstrates the positive
  strides taken across the game. In the women's professional game, it's great to see
  all the clubs are now compliant with having a full-time designated safeguarding
  and player welfare officer, or a fixed-term employee as they recruit for this role.
- Training: Our goal is to ensure that 100% of under-18 team coaches are up to
  date with all the latest safeguarding training we offer. We're at 90% now, and in
  2023/24 this will be an affiliation requirement, so 100% will be compliant and
  we can monitor this 24/7, alongside our continuous checking of Disclosure and
  Barring Service Checks.

Awareness: The 'Play Safe' campaign – now in its third year – enables the whole
of football to come together over one weekend every year to promote the
importance of safeguarding. County FAs, clubs and leagues at every level also use
the opportunity to explain to everyone with a connection to their organisation –
crucially parents/carers – how they are embedding safeguarding in their everyday
work. The engagement levels are huge – last season we reached one million
people via social channels – and crucially Play Safe also helps football explain how
people should report any safeguarding concerns they have.

It's also vital that all our safeguarding work is credible and well-informed. That was one of the key reasons for forming a Survivor Support and Safeguarding Advisory Group Survivor five years ago. The majority of members of the Group have lived experience of childhood sexual abuse in football and their honesty and insight helps shape and provide a critical eye across numerous areas of our safeguarding work.

The aim of all this work is – and will always be – to provide a safe and positive environment for everyone who wants to be part of our national game.



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Mark Bullingham Chief Executive, The FA

# OUR PURPOSE, APPROACH AND PRINCIPLES

#### Football's lead organisations in England are united by a threefold safeguarding purpose:

#### **WE WILL:**

 Implement preventative safeguarding measures and create fun, safe football environments.

- 2. Make the reporting of concerns as easy as possible.
- 3. Ensure safeguarding, child and adult protection concerns are investigated swiftly and thoroughly in conjunction with statutory agencies and with demonstrable outcomes.







MARK BULLINGHAM

Chief Executive, The FA





RICHARD MASTERS

Chief Executive, Premier League





TREVOR BIRCH

Chief Executive, EFL







**DAWN AIREY** 

Chair, FA Women's Super League and FA Women's Championship Board





MAHETA MOLANGO

Chief Executive,





RICHARD BEVAN

Chief Executive, LMA





**DANIELLE EVERY** 

Chief Operating Officer, PGMOL

- Our approach: The above chart reflects the collaborative safeguarding work that goes on every day across the football landscape. This work extends beyond the football bodies and for example, encompasses the group set up to ensure survivor voices are heard. It also means working closely with statutory bodies and organisations such as those listed in the second columns on page 34. Crucially, collaboration also means ensuring the voice of the child is heard this may sound obvious, but is often overlooked.
- Our principles: Our safeguarding work is based on the five principles on page 13 of Building an Ever-Safer Culture, our main Safeguarding Strategy, which you'll find <u>here</u>.

## **OUR FIVE FOCUS AREAS AND STRATEGIC GOALS**

Our strategy has five focus areas, each with its own strategic goal:

#### **FOCUS AREA** STRATEGIC GOAL 1. LEADERSHIP To provide strong leadership of safeguarding across the game and deliver effective governance frameworks. **AND GOVERNANCE** To clearly communicate the expected standards, regulations, and policies across the game and to 2. STANDARDS support those in designated safeguarding roles to drive and monitor safeguarding practice and culture. To create ever-safer football environments through robust recruitment processes, driving safer working practice and culture, utilising insight and delivering clear messaging and 3. PREVENTION inspirational campaigns. 4. EDUCATION To deliver accessible, impactful safeguarding education programmes, resources and AND EMPOWERMENT information to help create ever-safer football environments for children and adults at risk. To make the reporting of concerns as easy as possible, continue to build strong 5. PROTECTION partnerships with statutory agencies in managing abuse cases, provide guidance on managing 'low-level concerns' and deliver robust case management by The FA.

From pages 8-30 inclusive, you'll read about the work we've undertaken in the last 12 months against each of the above focus areas. Within that work, we've listed a number of interventions which reflect recommendations made in Clive Sheldon QC's independent report into allegations of non-recent child sexual abuse in football, published in March 2021.

#### **YEAR 2 IN NUMBERS**

#### 1. LEADERSHIP AND GOVERNANCE

100%

of FA Board and Senior Management Team received safeguarding refresher training. 100%

of County FA Board Directors up to date with safeguarding training. 82

**INDIVIDUALS** 

and family members accessed Sporting Chance support this season. £84,186

awarded by FA Benevolent Fund this season to survivors of abuse in football. 30

individuals supported this season via Professional Footballers' Association (PFA) Survivor Support Advocate Service.

#### 2. STANDARDS

50%

of County FAs, English and Independent Schools Associations (52) independently assessed this season as part of a rolling programme. 100%

of Premier League clubs (20) independently assessed this season. 30%

of EFL clubs independently assessed this season, as part of a rolling programme through which all clubs have been assessed by Barnado's. 100%

of BWSL and BWC clubs (24) have appointed a Designated Safeguarding Officer or an FTE equivalent.

#### **YEAR 2 IN NUMBERS**

#### 3. PREVENTION

90%

of under-18 grassroots coaches in-date with safeguarding training. c1,000, showing as non-compliant are being monitored through to compliance or suspension by County FAs. 99,826

DBS checks undertaken August 2021 – June 2022. 100%

of 32 football, sport and concert events at Wembley risk-assessed, with safeguarding plans in place. 27

England Teams camps, at St George's Park or England fixtures 'on the road' were risk-assessed and had event safeguarding plans in place. 47%

of parents/carers of youth players are aware of Play Safe (see pages 20/21). 59%

of parents/carers think grassroots football is safer, having seen the Play Safe campaign.

# 4. EDUCATION AND EMPOWERMENT

151K

learners completed safeguarding courses

91.6%

of learners feel confident/very confident in their safeguarding skills and knowledge having completed The FA Safeguarding Children course. 13,416

completed new Safeguarding Awareness for Parents/Carers' course (launched May 2022).

4.8/5

average post-course confidence rating by parents/carers.

#### 5. PROTECTION

94%

referrals received by FA initially assessed in two working days, in line with our KPI for this area of work.

100

concerns about child and adult safeguarding at Wembley events resulted in five referrals to statutory agencies.

# LEADERSHIP AND GOVERNANCE

#### **STRATEGIC GOAL:**

To provide strong leadership of safeguarding standards across the game and deliver effective governance frameworks.

#### What we said we'd do

- Continually improving the ways in which we assess the impact of the safeguarding measures that are implemented.
- Continuing to deliver safeguarding training and continuous professional development (CPD) to The FA Board and the Boards of all County FAs and Affiliated Associations.
- 3. Continuing to engage with and support The FA Board Safeguarding Champion and enhance the support for the County FA Board Champions.
- 4. Continuing to partner with Sporting Chance to provide therapeutic support to survivors, support the work of The FA Benevolent Fund and the PFA in relation to the Survivor Support Advocate Service.
- Support The FA Survivor Support and Safeguarding Advisory Group (FASSSAG) to input to football's work and exert their influence more widely in sport and society.

- Measures' framework in place to track all strategic actions. Shared with FA Board and FA Survivor Group.
- Insight tracks impact of public-facing campaigns, e.g., Play Safe, Respect, Enough is Enough.
- An independent QA process was implemented by Praesidio, for the independent Safeguarding 365 assessments, conducted by NSPCC CPSU on behalf of The FA. The QA process confirmed that the assessments are "a people exercise that is thorough and evidence-based and carried out through expert questioning with a range of relevant people from the County FAs." It also confirmed that the assessments are conducted consistently and to an overall high standard.
- S365 tracks 11 measures across the Standard, in grassroots youth and adult open age football.
   For each measure there is a definition, baseline, target, data source and reporting process.

- 100% FA Board members received training input on 'low-level concerns'.
- 100% County FA and National Associations' Boards received safeguarding updates and maintained safeguarding CPD, and this was verified by the NSPCC CPSU as part of the Safeguarding 365 Standard independent assessments.
- FA Board Champion met with FA Survivor Group and regularly engaged with Head of Safeguarding and Head of Safeguarding Case Management. She also met separately with the Irish FAs Board lead.
- County FA Board Champions were provided with tailored input via the County FA Safeguarding Conference (November 2022) and were invited to a webinar on leadership and culture delivered in conjunction with Professor Jay and colleagues from the Independent Inquiry into Child Sexual Abuse (IICSA).
- Sporting Chance delivered support to 58 survivors and family members, supporting 283 in total since 2017.
- The Benevolent Fund supported a further 22 applications, from a total of 127 applications, with £493,666 awarded since 2019.
- The PFA Survivor Advocate supported 30 individuals this season, with 117 supported in total since 2019.

- The FA Survivor Group met six times during the season, inputting to The FA's thinking on:
- the Play Safe 22 campaign and and planning for Play Safe 23;
- responding to the Government's consultation on Mandatory Reporting;
- discussing the IICSA Final Report;
- debating an FA project to address risks in relation to external coaching providers
- hearing about a new Player Welfare Course for adult open age football;
- and helping to shape the evolving work to address bystanding.
- Members of the Group, as well as Ian Ackley, the PFA Survivor Support Advocate, contributed their voices and lived experience on seven occasions via films, podcasts or speaking at events. See case study on page 10.

# **LEADERSHIP AND GOVERNANCE**

# (continued)

#### Specific activity based on Sheldon Report recommendations:

#### What we said we'd do

- 6. Regular safeguarding refresher training every three years for The FA Board and Senior Management Team.
- 7. Safeguarding training every three years, for the Boards of all men's and women's professional clubs, across the Premier League, EFL, Barclays Women's Super League (BWSL) and Barclaus Women's Championship (BWC).
- 8. Enhance the advocacy for safeguarding at Board level, through the appointment of and engagement with additional Board Safeguarding Champions e.g., in the women's professional game.
- 9. Publish a safeguarding report at the end of each season, providing a position statement and progress updates on safeguarding across the game.

- FA Board received training input on 'low-level concerns'.
- The FA Senior Management Team input discussed current safeguarding progress, risks and mitigations.
- All professional clubs must ensure Board members receive annual safeguarding training. This is subject to regular audit.
- The Premier League's Safeguarding Standards require club Board members to attend its Safeguarding Leadership, Governance and Culture Training which must be succeeded by annual continuing professional development.
- All 72 EFL club Board members are required to complete the newly released, bespoke EFL Board of Directors' mandatory course within three months of appointment.
- 62% of BWSL and BWC club Board Members trained either via PL, EFL, FA or other training input. The nine remaining BWSL and BWC Boards have a plan in place to ensure their Board members are trained during the first part of 2023/24 season.

- 100% BWSL and BWC Clubs have a named Board Champion in place.
- There is a named Board Champion on the BWSL and BWC Board and The FAs Women's Football Board will appoint a Board Champion in 2023/24 season.
- The Safeguarding Strategy Year 2 Review you are reading is the report on the 2022/23 season.



### Case study, looking at:

### The positive influence of sharing lived experience

Former professional and grassroots footballers with lived experience of non-recent child sexual abuse in football have inputted to The FA and football's work again this season – to positive effect.

"Last October, Gary Cliffe, Dion Raitt, Ellie Guedalla and Jamie Cartwright appeared in films supporting the Play Safe 2022 campaign to raise awareness of safeguarding in football," says Sue Ravenlaw, FA Head of Safeguarding. "The films featured on the Play Safe page on The FA's website and were amplified via sites like Team Grassroots, playing a part in helping us reach over one million people."

One month later, as part of the Safeguarding 365 conference for all County FAs and National Schools Football Associations, Gary Cliffe, Ellie Guedalla and Jamie Cartwright sat on a panel answering Q&As about the importance of the work of the County FAs in safeguarding across the grassroots game.

"We also collaborated with the Independent Inquiry into Child Sexual Abuse (IICSA) and hosted a webinar with 300+ delegates from across the game," notes Sue. "Two of The FA Survivor Group members sat on the panel alongside Professor Alexis Jay and other football and child protection speakers and discussed the IICSA recommendations – including the call for Mandatory Reporting".

Anne Tiivas OBE, Chair of Trustees for Safe Sport International, who co-presented with Dion Raitt on a sport-wide safeguarding webinar, said: "Hearing and centring the voices of survivors like Dion is essential for all sports bodies to inform the development and implementation of safeguards for every child and adult. Dion was a truly inspirational speaker and his interview was moving and humbling."

In June, Ellie Guedalla co-presented alongside FA staff at the Women's National League AGM, helping focus minds on the importance of driving the right culture and behaviours in the adult game, including reporting concerns. In the same month, Ian Ackley, PFA Survivor Support Advocate, co-presented alongside Sue Ravenlaw and Sarah Walker of The FA at a UEFA webinar for National Football Associations across Europe on managing concerns and ensuring the survivor welfare.

The cycle of input has already started for next season, with The FA Survivor Group actively supporting Play Safe 2023.



To discuss the above topic and other aspects of their lived experience of non-recent child sexual abuse in football, Jamie Cartwright (left), Gary Cliffe and Ellie Guedalla recorded an honest and insightful video for the 2022 Play Safe campaign. You can watch it here.



# **STANDARDS**

#### **STRATEGIC GOAL:**

To communicate clearly the expected standards, regulations and policies across the game and to support those in designated safeguarding roles to drive and monitor safeguarding practice and culture.

#### What we said we'd do

- 1. Continuing to demonstrate that The FA meets and evolves in line with the NSPCC CPSU Standards.
- 2. Collaborating with the Premier League and EFL as they ensure their independently assessed Standards are met across their club membership.

- The NSPCC CPSU confirmed that The FA has met the requirements of the Standards and evidenced that in many cases these have been exceeded.
- The Premier League and EFL require their clubs to demonstrate they meet their safeguarding standards.
- This season all 20 Premier League clubs and 22 (30%) EFL clubs have been independently audited against the Premier League's and EFL's Safeguarding Standards.
- The Premier League commissions a regular independent review of its own procedures and practice. The 2022/23 audit found that safeguarding is well embedded within governance, operations and culture' and described the Premier League as 'one of the leading organisations in terms of setting safeguarding standards'.
- The Premier League also received an Ofsted inspection in July 2023 and has again been awarded a rating of 'Outstanding' across all areas. Ofsted noted that 'the arrangements for safeguarding are effective' and 'that there is a very strong culture of safeguarding'.
- Where relevant, actions have been identified for clubs to implement continuous improvements.
- Ofsted assessed the support to scholars in EFL clubs as outstanding in all areas, February 2023. Ofsted quotes:
  - "Learners and apprentices highly value the support they receive from staff at LFE.
     They have access to mental health first aiders, counselling, and cardio screening to monitor and improve their physical health. Learners and apprentices receive specialist training sessions from external organisations who promote positive mental health and, sexuality and gender issues in sport."

- Ofsted quotes continued:
  - "Learners and apprentices feel safe. They know how to keep themselves and
    others safe from radicalisation and extremism. Learners and apprentices are
    aware of local risks such as county lines and knife crime. They complete an
    extensive range of learning on topics such as healthy lifestyles, drug and alcohol
    misuse and mental health. A range of specialist speakers provide training on
    safeguarding awareness in football and suicide prevention."
  - "Leaders place a very high priority on the safeguarding and well-being of their learners and apprentices. They effectively record and monitor safeguarding referrals and welfare concerns."
  - "Leaders ensure that they liaise well with external agencies and put support
    in place swiftly. Bullying and harassment is not tolerated within LFE.
    The designated safeguarding lead and their deputies are very well trained
    and experienced to carry out their roles effectively. Player care leads provide
    high levels of well-being support for learners and apprentices. Staff and board
    members benefit from annual training on safeguarding and the 'Prevent' duty.
    Staff know how to report safeguarding concerns. Managers carry out appropriate
    checks on staff during the recruitment process to ensure they are safe to work
    with learners and apprentices."

## **STANDARDS**

# (continued)

#### What we said we'd do

- Ensuring all Barclays Women's Super League and Barclays Women's Championship clubs meet the required safeguarding standards as per their club licence.
- 4. Supporting the independent assessment of every County FA and Affiliated Association<sup>1</sup> against The FA's bespoke 'Safeguarding 365' Standard and ensuring all compliance requirements are met.
- Ensuring The FA meets and continues to evolve in line with the Ann Craft Trust Safeguarding Adults' Framework to develop standards and promote best practice when working with adults in football.
- 6. Reviewing the safeguarding provision within men's clubs in the National League System (NLS) and women's clubs in The FA Women's National League (FA WNL) and supporting their development.
- Regularly reviewing and updating our safeguarding regulations, policies and procedures.

- 100% of the 24 clubs have appointed a Designated Safeguarding Officer or an FTE equivalent. Seven clubs are recruiting.
- 100% of the 50 County FAs, ISFA and ESFA were independently assessed in 2022, and demonstrated that they met the Safeguarding 365 Standard.
- Between March and July 2023, 26 County FAs were assessed, and all 100% met the Standard at the initial assessment – this is the first time this has been achieved. The remainder will be assessed during the 2023/24 season.
- Collaboration with The Ann Craft Trust (ACT) continues to ensure practice and guidance are developing in alignment with the ACT safeguarding adults' standards framework.
- Safeguarding plan and risk assessment undertaken for The FA Disability Cup 24-25 June 2023, including the new experience area allowing attendees to try different formats of the game.
- Designated FA safeguarding staff are in place to drive safeguarding standards and support the case management for NLS Steps 1-4 Clubs.
- The Vanarama National League has appointed a DSO to support clubs in Steps 1-2.
- A survey was distributed to the NLS Steps 1-4 Club Welfare Officers (Adult) and will help shape bespoke training for this level of the game.
- Meetings with clubs, leagues and county FAs have taken place and are ongoing. These have ensured we continually reflect on the live safeguarding landscape and ensure that our actions are informed by the needs of those within this level of the game.
- Working with the Women's National League and in line with the WNL strategy 'Empowering for Success', enhanced safeguarding requirements have been built into the Club Licence that will be rolled out over coming seasons.

- The FA Safeguarding Children Regulations were updated for 2022/23.
- A new safeguarding declaration was developed and introduced as part of the Club Affiliation process for 2023/24 season.

<sup>&</sup>lt;sup>1</sup> Affiliated Associations are national bodies who govern specific areas of the game, such as the English Schools FA (ESFA), the Independent Schools FA (ISFA) and the football associations of the various armed forces.

# **STANDARDS** (continued)

#### What we said we'd do

- 8. Providing ongoing support and training for the network of designated safeguarding persons (Board Champions, organisation Senior Leads and Designated Officers) across the game.
- Ensuring that those in regulated activity working with children's (under-18) and adult teams - including adult disability teams – who have not yet undertaken safeguarding training, do so.
- 10. Refreshing and publishing updates to the series of FA safeguarding guidance notes which can be found *here* on various topics, and proactively promoting them across the game.

- Training opportunities provided for those in designated safeguarding roles, i.e.:
  - County FAs: Safeguarding 365 conference;
     IICSA leadership and culture webinar;
     Managing Safeguarding in Your County;
     Safeguarding Adults; Thresholds for Referrals.
     In addition, County FAs accessed third-party training e.g., via local authorities.
  - Premier League clubs receive tailored support and training as part of individual support plans.
     Additionally, the Premier League delivers regular training and awareness events to support club staff at all levels to fulfil their safeguarding responsibilities. Clubs are also provided with opportunities to attend peer support and practice-sharing events.
  - EFL Clubs rolling programme of: DSO Level 3
     qualification; Adverse Childhood Experiences;
     Contextual Safeguarding; Child Sexual
     Exploitation; Introduction to Domestic Abuse;
     Recognising and Dealing with Bullying Issues;

- Mental Health First Aid (Youth and Adult); Safeguarding Investigations and Decision-Making; Online safety; Training for Senior Safeguarding Managers with NSPCC, Safer Recruitment and new for 2022/23 Harmful sexual behaviour and adultification.
- EFL Trust: Level 3 DSO Qualification; Safer Recruitment; Safer Culture; Safeguarding Adults at Risk and Mixed Age Activities; Safeguarding Online Activities; Writing a Safeguarding Policy; Responding to 'low-level concerns'; Safeguarding Walking Football. EFL Trust also hosted monthly DSO sessions to network and share best practice.
- BWSL and BWC Clubs: Safeguarding forums in place for BWSL and BWC DSOs to discuss emerging themes, share good practice and reflect on practice. Board training developed for and offered to BWSL and BWC Clubs.
   Programme scoped for new FTE DSOs operating across the BWSL and BWC Clubs.

- Registered under-18 teams must name coaches working with them.
- 24,000 coaches of under-18 grassroots teams did not have an in-date safeguarding training record.
- We promoted 50% discounts to this cohort over a four-month period and 90% of under-18 grassroots coaches in-date with safeguarding training.
- Under 1,000, are showing as noncompliant and are being monitored through to compliance. Coaches who remain non-compliant will be suspended.

- FA safeguarding guidance notes 1.9 (Safeguarding Risk Assessment and Guidance) have been updated and a new user-friendly form has been added: 1.9A (Editable Safeguarding Risk Assessment Form).
- FA safeguarding guidance notes 1.7 (Appropriate Behaviours and Position of Trust) have been further revised.
- Section 3 Safer Recruitment and DBS Checks has had a significant review. Guidance on DBS checks is now available in one download 3.1, Safer Recruitment of Volunteers in Grassroots Football, which is simpler, and we trust more accessible.
- The remaining guidance is covered by the following Guidance Notes:
  - 3.2 Eligibility of roles
  - 3.3 Recruitment of Ex-Offenders
  - 3.4 FA Policy on handling of DBS check certificates
- Section 4 Safeguarding Courses, the landing page has been updated to reflect the courses currently available.
- Section 5 DSO Network, the landing page has been updated to reflect the changes re WGS to Club Portal.

# **STANDARDS** (continued)

#### Specific activity based on Sheldon Report recommendations:

11. Ensure that clubs proactively share their welfare/
safeguarding officer's contact details, as well as their policy
and procedures with their players and their parents/carers
when players join and at the beginning of each new season.

# 12. Incorporate into the Safeguarding 365 Standard a review

What we said we'd do

- of the clubs' safeguarding policies and practices, including overnight stays, away travel and trips, use of social media, and coaching in a digital environment and obtain the views of children and young people.
- 13. Ensure that the designated safeguarding persons in professional clubs regularly report to their club's Board on safeguarding matters. At every Premier League and English Football League (EFL) Championship club, there should be a dedicated, full-time, salaried post, with suitable qualifications and experience. In EFL Leagues 1 & 2, there should be, as a minimum, a part-time salaried post, with suitable qualifications and experience, and 50% of their time should be dedicated to safeguarding.

#### What's happened?

- The Premier League and EFL Standards require clubs to do this. Club compliance and practice is subject to regular independent audits.
- In grassroots football, The FA undertook a survey of over 500 clubs to sense-check club proactivity. This indicated:
- 80% adopted The FA's Safeguarding Children policy template. 1% stated they did not have a Safeguarding Children policy – these clubs were contacted immediately to address this.
- Almost all clubs share their policy with their members; twothirds make it available online and at least one-third make it available as hard copu.
- Clubs are most likely to share their policy at the start of the season with two-thirds sharing it when someone joins.
- This insight, as well as learning from County FA proactive work with clubs, informs how we continue to check and challenge club practice and support clubs to be proactive and transparent with this information.

- The grassroots club survey also provided insight into club practice highlighting:
- How Covid-19 impacted club activity in relation travel and overnight stays.
- 1 in 5 clubs hosted online coaching sessions for under-18s.
- 6 in 10 clubs stated they always required parent/carer supervision in these sessions.
- At least half of clubs said they only worked in groups when running sessions online with under-18s.
- Half the clubs enabled children to contribute to the way the team/ club runs e.g., via surveys or asking their captains for feedback. This insight, alongside County FA Safeguarding 365 desktop reviews of club policies, informs how we best support, check and challenge club practice.

- Safeguarding is a standing Board agenda item for the Premier League and EFL.
- The Premier League and EFL Safeguarding Standards require club boards to provide effective leadership and governance over safeguarding arrangements.
- The Premier League standards also state the minimum staffing requirements, ensuring clubs meet this recommendation.
- The EFL introduced minimum staffing requirements via a regulation for the 2021/22 season. EFL Club Chief Executives completed a self-certification in November 2021 stating that they met the staffing requirements. This is also checked as part of the independent audit process to ensure that all Clubs are compliant.

# Case study, looking at:

#### Giving safeguarding everyday meaning

Making safeguarding understood, visible and accessible to players, staff and fans was Lisa Reynolds' self-set goal when she arrived at West Bromwich Albion in June 2022 as the club's Head of Safeguarding and Player Welfare.

First came a detailed review of safeguarding policy and practice across the club, revealing there was more to do to bring safeguarding into the everyday consciousness of all the club's stakeholders.

"With this in mind – and with the full backing of the Board – we created the 'Baggies Safe' brand," says Lisa. "We used it as the platform to educate and inform staff and players, empowering them to talk openly about safeguarding and if they had any, how to report concerns."

Behind the scenes, all the club's safeguarding policies were re-written, with easy-read versions made accessible online. Printed copies were made available at safeguarding stations throughout the club.

"To promote safeguarding messages further, we formed a Safeguarding Champions Group," continues Lisa. "The whole project was a club-wide initiative, with all departments invested and involved. It became everyone's journey. The media and marketing teams produced posters with QR codes for easier reporting. These are now displayed throughout the stadium, as well as at our Academy and training ground."

In addition, the first team helped produce an information film which is now played before every home match. Matchday safeguarding staff are clearly identifiable and there has been a significant increase in matchday reporting.

"Overall, our club staff have grown in confidence around safeguarding and the quality and quantity of concern-reporting has improved greatly."

Beyond the club, local support services have been embraced and an excellent relationship has been forged with the local authority and the LADO (Local Authority Designated Officer) now sits on the Club's Case Management and Safeguarding Steering Groups.

Looking ahead, the club's safeguarding team is expanding, with the Board recognising the vital role 'Baggies Safe' plays in creating a safer environment for all.





# Helping County FAs drive grassroots club safeguarding culture and compliance

Helping County FAs consistently meet The FA's enhanced safeguarding compliance requirements is the positive purpose of the Safeguarding Shared Services project, launched in 2021.

The project has also delivered a more efficient and cost-effective way for County FAs to proactively manage the continuous compliance of DBS Checks and safeguarding training requirements for eligible participants. That's because even though FA systems notify participants with a three-, two-, and one-month reminders that their credentials are nearing the expiry date, people don't always act swiftly, often resulting in non-compliance suspensions.

The service is hosted by West Riding FA and is led by Gemma Webster, National Safeguarding Officer, who explains: "We started with 11 County FAs and because it's been so effective, we have now scaled up with three staff, supporting 30 County FAs. The service has brought a consistent approach to the process of compliance oversight and management."

Nigel Saverton, Oxfordshire FA's Designated Safeguarding Officer testifies to the positive impact of the project: "We receive a high-quality service, freeing up many hours of staff time and importantly resulting in all our teams remaining compliant. It means we have not had to suspend any teams for non-compliance, which we had to prior to joining the Safeguarding Shared Services project."

To convey scale, The FA processed c99k DBS Checks in the 2022/23 season and there were c151k attendances on The FA's safeguarding courses. On average, every month 5,301 individuals' DBS Check and or safeguarding training 'expires' against The FA's in-date requirements.

As Gemma explains: "Our team of data analysts works closely with the participating County FAs through scheduled weekly calls, helping focus County FA DSOs' time on relevant individuals and or clubs. Working together and being proactive in this way, results in fewer than 1% of individuals credentials actually expiring.

"It's been great to see that through our interactions, clubs have become more aware of the importance of maintaining up-to-date data on their officials and acting in a timely manner when red flags notify them of upcoming expiry dates."



# **PREVENTION**

#### **STRATEGIC GOAL:**

To create ever-safe football environments through robust recruitment process, driving safer working practice and culture, utilising insight and delivering clear messaging and inspirational campaigns.

#### What we said we'd do

- Reviewing and updating The FA safer recruitment policy for all staff and consultants.
- Processing 70-75k DBS Checks each season and risk-assessing and managing the checks that include content indicating criminal convictions, cautions or additional information that may be relevant to safeguarding children and or adults at risk. This directly links to Focus Area 5: Protection.
- 3. Continuing to embed safeguarding in all relevant FA strategies and participation programmes.

- Further training on safer recruitment delivered for new HR staff.
- 99,826 DBS Checks undertaken August 2022 July 2023.
- The checks enabled The FA and professional clubs to risk assess and screen out anyone with a known history indicating they may pose a risk of harm to children or adults at risk.
- The Premier League works in partnership with the Disclosure and Barring Service (DBS) and the National Society for the Prevention of Cruelty to Children to help clubs and their community organisations implement robust and effective safer recruitment procedures and practices, which ensure that staff and volunteers are suitable to work with children and adults at risk. The Premier League and its clubs implement robust safer recruitment and procurement procedures.
- Club staff can seek support and updates from the DBS in relation to safeguarding and referring concerns about individuals that may or do pose of risk of harm to children and adults at risk.

- Multiple existing and new FA and partner initiatives and programmes have been supported for example:
- Nike Sports bra roadshows as part of Nike's global commitment to getting kids moving, removing barriers, and expanding girls' access to the many benefits of physical activity they ran three regional sports bra roadshows, hosted at two Premier League clubs and one National League football club, to educate about the apparel and equipment girls and women need to play with confidence. The roadshows were incorporated into a series of tournaments where girls were invited to try on sports bras and were educated about the perfect fit and how it can help with body confidence and performance in sport. Protocols around the tournaments and sports bra fittings, as well as the Nike Sports Bra Playbook, Sports Bra Distribution Guide and Sports Bra Fit Card were all reviewed, and guidance given from a safeguarding perspective.
- Weetabix Wildcats is a national programme
  of non-competitive football for girls aged 5-11
  years, who want to give football a go for the
  very first time or want to play with other girls
  their own age. It's all about fun and meeting
  new friends. The safeguarding team supported
  the risk assessment and safeguarding plans in
  relation to an event at St George's Park, with
  c90 Wildcats and Community Coaches, the
  event included them being able to watch the
  Lionesses train.
- Barclays Girls' Football School Partnership –
  we reviewed and refreshed the safeguarding
  agreement and practices, as part of our work
  with Youth Sport Trust (YST) who have been
  integral to delivering this programme.
- The Premier League and EFL have embedded safeguarding in their commissioned activity and programmes.

# **PREVENTION**

# (continued)

- Ensuring safer working practice is maintained across all England teams, at Wembley events, at England 'on the road' events, and at UEFA Women's EURO 2022.
- 5. Piloting and then launching a safeguarding self-audit tool for grassroots clubs' committees to track their progress in
- Promoting the UK Government's safeguarding guidance for out ofschool settings to parents/carers who may access football activity via unaffiliated private football providers.

What we said we'd do

Continuing to evolve The FA's Respect campaign messaging to influence behaviour on the sidelines of youth matches and abuse towards referees.

- 32 football, sport and concert events were delivered at Wembley. 100% were risk-assessed and had event safeguarding plans in place.
- Our Event Safeguarding Advisors (ESAs) were deployed to these events and as a result managed the 100 concerns that arose at these events, resulting in 5 referrals were made to statutory agencies. These referrals related to child or adult welfare concerns that came to light whilst they were at our venues.
- 27 England Teams camps, at St George's Park or England fixtures 'on the road' were risk-assessed and had event safeguarding plans in place.
- 67 events held at St. George's Park by third parties had safeguarding plans and risk assessments in place.

- This work is planned to begin in 2023/24.
- This guidance for parents / carers continues to be reflected in:
  - FA guidance notes 8.1
     'Questions You Should Ask' for parents/carers.
- The FA Play Safe campaign.
- The Safeguarding Awareness course for parents/carers in football.

- All FA-led campaigns were aligned in messaging.
- We created two separate campaigns, to tailor messages on behaviour. Enough is
   Enough was launched to set expectations and address unacceptable behaviours in
   the game. Respect has evolved to focus on promoting the behaviours we want to see
   in the game, through the Positivity Always Wins campaign.
- In terms of activations:
  - Silent Support Weekends were trialled in the youth game with two pilot weekends, to shine a light on side-line behaviour. The aim of the trial was to assess the impact of silent side-lines, on youth games. Around 30,000 teams took part in each pilot weekend, and extensive feedback was collected from players, coaches, referees and spectators. Referees found the match experience in this environment more enjoyable, while feedback from players and parents was mixed. During the first pilot, coaches were also asked to remain silent, which they felt negatively impacted their role, whereas in the second pilot, they were encouraged to use their voice in a more targeted than normal manner, and in this environment, they found the lack of interference from spectators beneficial. We will continue to promote the weekends in 2023/24 to highlight the impact side-line behaviour can have in youth matches
- We also re-emphasised to referees, the need to use Sin Bins, to combat dissent from players, in the hope that temporary dismissals, curtail this behaviour. The initiative was introduced in the 19/20 season, to great effect, but the usage had dropped off after football returned post-Covid.

# PREVENTION (continued)

#### Specific activity based on Sheldon Report recommendations:

#### What we said we'd do

- Launch an ongoing safeguarding awareness campaign, to signpost those involved in football, including parents and families, towards information on safeguarding and minimising risk.
- Work with stakeholders across the game and devote one day of the year to a National Day of Safeguarding in Football every season.

- The Play Safe campaign 2022/23 had a massive 1M reach via social media.
- Monitoring shows that over 2022/23 season 78% of parents/carers felt positively about the Play Safe campaign, with 57% of them feeling football is safer, having seen the campaign. See case study on pages 20-21.
- We further amplified Play Safe via The FAs support for two national safeguarding events:
- Anti-Bullying Week 14-18 November 2022
- Safer Internet Day 7 February 2023.
- All Play Safe activations included a call for parents to complete The FA's free online parent/carer course.

- While safeguarding is 365 days a year and 24/7 throughout football, the National Safeguarding Weekend is the main iteration of Play Safe campaign (see case study on pages 20-21).
- The 2022/23 Play Safe-branded weekend was scheduled for 17th/18th September but was deferred to 1st/2nd October 2022. following the passing of Queen Elizabeth II. It was testament to the commitment of football stakeholders to safeguarding, that the Play Safe weekend was rescheduled so swiftly, and was delivered only two weeks after the original planned date.
- As part of The FA's Play Safe campaign, the Premier League worked with the NSPCC to fund its Childline service as part of the charity's 'One Unforgettable Day' initiative.



# Case study, looking at:

#### Football's united safeguarding campaign: Play Safe

October 1st/2nd 2022 saw the second annual national football safeguarding weekend, branded Play Safe.

Led by The FA and endorsed by the NSPCC, Play Safe is supported across every level of English football, including the Premier League, EFL, Barclays Women's Super League and Barclays Women's Championship, and across the grassroots game.

The primary audience for the Play Safe weekend flexes each year – 2022 was mainly aimed at parents and carers, with two key messages to convey:

- Awareness of the vital safeguarding role parents/carers play in football; and
- Encouragement to take the short, new and free online safeguarding course created specifically for parents/carers. You can access the course **here**.

Importantly, encouragement to take the new course came from FASSSAG – The FA's Survivor Support and Safeguarding Advisory Group: "We have inputted into the course and helped frame its key messages from our collective experiences. It's vitally important to us that every parent/carer understands they role they need to play in football. Taking this course can make a real difference – we are asking every parent/carer to commit to help ensure football is ever-safer."

To activate the campaign across the country, The FA created and distributed a range of assets, many of which were editable so a County FA, league or club could place their own logo alongside the main Play Safe branding. You can see examples of these assets on these pages.















Play Safe 2022 was supported across every leval of the game. At professional level, managers wore Play Safe pin badges and captains wore Play Safe-branded armbands (see pics top left) and some clubs produced bespoke t-shirts, such as the one worn by Aston Villa Women above.





In addition, short films were produced and captains across the professional game wore Play Safe-branded armbands over the weekend. Managers of professional clubs also wore Play Safe pin badges. A specialist social media agency was brought on board to get conversations about safeguarding going across the grassroots game – and to encourage clubs to post usergenerated content about their Play Safe-related activities.

Engagement was massive, with more than 1.1 million people reached across the country and numbers increasing all the time of parents/carers taking the 'Safeguarding Awareness for Parents/Carers' course.

This year's Play Safe weekend was September 30th/October 1st. New assets were created, with the addition of the <u>Play Safe Pledge</u>, where everyone could state their support for the campaign and share details of the Play Safe activities they planned to undertake.

It's all part of the never-ending push to create an ever-safe culture within the game we all love.

The FA created assets such as those on the left to enable clubs, leagues and County FAs to show their backing for Play Safe

# EDUCATION AND EMPOWERMENT

#### **STRATEGIC GOAL:**

To deliver accessible, impactful safeguarding education programmes, resources and information to help create eversafe football environments for children and adults at risk.

#### What we said we'd do

- Instilling a child/adult at riskcentred approach and embedding this via wider FA programmes, educational courses and general messaging.
- Delivering safeguarding refresher training for all FA staff and consultants.
- 3. The Premier League continuing to deliver workforce learning and development opportunities, empowering children, young people and their parents/carers, and working with the NSPCC to enhance child-centred interventions.
- 4. Providing safeguarding training for the designated safeguarding persons across the men's National League System and The FA Women's National League.
- Reviewing, revising and relaunching the free 'Safeguarding for Committee Members' course run by England Football Learning, to ensure it is also meets the needs of grassroots adult open-age clubs.

- Child/player-centred principles remain core to the way in which The FA shapes the thinking re: the future development of grassroots football.
- Work has continued this season to embed adult at risk-centred practice at all levels. For example:
- On a case-by-case basis, supporting County FAs to build their confidence to work in collaboration with adults at risk.
- Ensuring the player perspective has been considered and included in the design of the new Player Welfare resources.

- Session delivered with 100% of FA Senior Management Team.
- Briefings and refresher training delivered to targeted groups working with England Teams, specialist St George's Park events and those operating the Wembley Stadium Sensory Rooms.
- FA staff e-learning reviewed and thirdparty agencies supporting development contracted. The refreshed course will be released in 2023/24 season.
- 1:1 sessions were delivered for Commercial Partnerships Managers working with U18s or adults at risk in relation to media or social media activity.
- Key FA Grassroots Programme leads regularly used the Safeguarding Risk Assessment Template tool as part of their planning.

- The Premier League continues to deliver regular national training and awareness events, as well as training to clubs through individual support plans.
- In 2022/23, these training and awareness events focused on contextual safeguarding, care and accommodation providers/host families, safer recruitment, keeping children safe online, match day safeguarding, creating safe experiences/delivering safe events/activities, Prevent Duty, international safeguarding, concern, and allegation management.
- The NSPCC offered online safety sessions to young players as part of the Premier League's Life Skills programme, supporting them to keep themselves safe in an online space.

- Update provided to the Alliance Committee, April 2023 and training is scheduled for early in 2023/24.
- We've delivered input to the Women's National League (WNL) including via the 2022/23 AGM, which included input from a female coach with lived experience of non-recent child sexual abuse in football, as well as a focus on the safeguarding requirements for WNL clubs for 2023/24 season and beyond, through the new club licence.
- The safeguarding for Committee Members Course was re-launched in October 2022.
- Since the new course has launched, learners rated the course an average of 4.7 out of 5.
- Learners have also positively endorsed the course, saying it's:
- "Well put together and useful for any team / committee"
- "Another excellent course!"
- "Fantastic knowledgeable course"
- "Excellent course, worth putting the time in for this one."

# **EDUCATION AND** EMPOWERMENT

### (continued)

- 6. Continually evaluating, reviewing and improving critical courses to ensure they are high quality and provide appropriate support.
- 7. Evolving the e-learning Safeguarding Children course run by England Football Learning with contextualised webinar content and the opportunity for learners in different roles to interact with an expert tutor.
- 8. Continuing to embed safeguarding messages across all England Football Learning provision.
- 9. Continuing to align with the UK Government's plans and messaging to empower adults to identify risk and keep children safe as part of its Child Sexual Abuse (CSA) strategu.
- 10. Similarly, aligning FA messaging with the UK Government's compulsoru relationships' education in primary schools and relationships and sex education in secondary schools.
- 11. Reviewing and enhancing the safeguarding adult's guidance published on The FA's website. promoting this information directlu to adult players.

#### What's happened in the last 12 months?

What we said we'd do

- Accessibility review has introduced numerous changes to improve the learner experience aligned to Web Content Accessibility Guidelines 2.1 AA. Courses undergoing update in 2023/24 will also go through accessibility checks.
- The research conducted independently by Loughborough University on The FA's Safeguarding Children Course. concluded. It showed that online delivery is perceived to be as effective as face-to-face with essential knowledge.
- It also endorsed The FA's approach of requiring re-certification every two years. This is because the retention of some key information was significantly less 36 months or more after course completion. (see case study page 25)
- Areas of focus have been identified for contextualised webinar content and will be piloted in 2023/24.

- We recorded a podcast on safeguarding, with two current coaches from The FA Survivor Support and Safeguarding Advisory Group. This will be released as part of the Coachcast series in mid-September 2023 to align with Play Safe.
- Connected conversations across the business to build out an annual marketing and comms plan to ensure there is ongoing focus on safeguarding.
- Creation of a new welfare section on England Football Learning with a dedicated safeguarding section.

- All England Football Learning safeguarding courses are designed to empower adults in this way.
- The Safeguarding Awareness for Parents/Carers course empowers parents/carers in football and includes content on the potential risk of sexual abuse, grooming, exploitation, and reporting.
- Messages within our 'The Greater Game' programme are closely aligned with those within compulsory relationships' education. This includes a focus on positive interactions, thoughts, feelings, and behaviours. This is currently at pilot phase, prior to a national rollout in 2024.
- Child-friendly safeguarding polices, which are currently in creation, will support children to know how to report concerns and thus align with the 'Being Safe' objectives within the relationships' education requirements.
- The review and refresh of the safeguarding adult's guidance published on The FA's website is underway and will continue to the end of the 2023/24 season.

# EDUCATION AND EMPOWERMENT

### (continued)

Specific activity based on Sheldon Report recommendations:

#### What we said we'd do

- 12. Build and launch a tailored safeguarding e-learning course aimed at parents/carers, including content to help them to understand grooming and how to regularly check in with their child(ren).
- 13. Ensure the child's voice is considered and resources created for children themselves to empower them to contribute their views and to know they can speak up if they are worried about something. Partner with external experts and develop age-appropriate toolkits to support clubs and organisations. Regularly assessing the impact and acting on the feedback.
- 14. Create and disseminate safeguarding resources to raise awareness with adult players on how to recognise that another player may be struggling with something and may need help.
- 15. Mandatory
  safeguarding training
  for anyone working in
  regulated activity, who
  has not yet completed
  the training as part of
  an FA qualification.

#### What's happened in the last 12 months?

- The bespoke 30-minute
   Safeguarding Awareness for
   Parents/Carers course released
   in May 2022 covers this content,
   which is informed by parents/
   carers and The FA Survivor Support
   and Safeguarding Advisory Group
   (FASSSAG).
- Between 17 September 2022 2 August 2023, our website page on this course had:
- Page views 78,785
- Users 19,642
- Engagement rate 32.22%
- There have been:
- 20.544 enrolments
- 13,416 completions, (68% conversion rate)

- Learners have said:
  - "Good concise course that can be taken in a short amount of time.
     Perfect for busy parents who want to know how to keep their children safe in football."
  - "Great learning and hard hitting it has increased my sense of what to look out for with some good hints and tips."
- "Great training course will be recommending it to other parents/carers within the club."
- The course has an 4.8/5 average post-course confidence rating by parents/carers.

- Our research, in partnership with the University of Chichester, has been expanded to build on the initial phases commissioned last year. Listening to and understanding the experiences young players and officials from across the country has been central to this. Good practice case studies, child friendly policies and codes of conduct are being developed with and by children and young people.
- Our County FAs have been steadfast in enabling young people to contribute their views. This has been evidenced through the independent safeguarding assessments of the County FAs, undertaken by the NSPCC. Identified good practice has been shared across all counties via our \$365 conference and manual.
- We continue to collaborate with colleagues internally, as well as partners, including the Premier League and UNICEF to further opportunities to strategically embed the practice of listening to children across all areas of our organisation.

- Player Welfare resources have been developed in consultation with county FAs and clubs.
- The Player Welfare in Open Age Football eLearning module has been designed to support openage teams to recognise and respond to the key issues that impact player welfare and takes c45mins to complete. It launches at the end of August 2023.
- The welfare section on the England Football Learning website supports participants with information, guidance, and signposting.

 Please see the Standards' focus area, point 9, page 13.



#### Safeguarding learning that reaches more people, more often

In the last two seasons, England Football Learning – The FA's educational arm – has shifted its course development approach, with one aim in mind:

To deliver accessible, impactful safeguarding programmes, resources and information, reaching more people, more often.

The new approach has embraced multimodal opportunities, with the additional creation of resources such as a podcast and written resources that can be accessed anytime, anywhere.

"The podcast development has involved two current grassroots coaches who are also members of the FA Survivor Support and Safeguarding Advisory Group (FASSSAG)," notes Kim Hide, Head of Learning and Development at England Football Learning. You can listen to the podcast **here**.

"Since the Group was formed in 2018, they have played a critical consultative role in developing safeguarding courses. That involvement has stepped up this season as we develop learning resources that everyone can access."

Of course, with any significant shift of learning provision, it's vital to understand if the shift has been effective and is having greater impact.

"With this in mind, we commissioned Loughborough University to research the Safeguarding Children Course as a start point," says Kim. "We asked them to look at course satisfaction, confidence of learners, self-reported knowledge development and the overall course value."

Using a combination of online survey and small focus groups, headline evidence-backed outcomes included:

- The digital and virtual learning solutions effectively support individuals with essential knowledge for their roles.
- Our safeguarding learning offer supports learners in making the game safe for all.
- The more holistic, frequent, and accessible learning offer meets learners' needs.

To access England Football Learning's suite of safeguarding courses, go <u>here</u>.







# Case st

# Case study, looking at:

### Listening to and empowering children and young people

Embedding a child-centred ethos is a cornerstone of The FA's safeguarding work – particularly when it comes to creating child-friendly resources.

That's why throughout 2022/23 we have continued to build our multifaceted research project with the University of Chichester, 'Listening to Children'. It's meant working directly with young people within clubs and County FAs across the country to listen to and understand their experiences.

As a result, child-centred resources informed and shaped by young people themselves will be published in the months ahead. These will include:

- Good practice case studies, reinforcing the positive impact that listening to children can have.
- Child-friendly safeguarding policies to empower children to speak up if they are worried.
- Codes of conduct adapted into formats preferred by under-18s.

Listening to children has been a central component in the development of 'The Greater Game' and 'Comets' programmes this year. At all stages from conception, planning and refinement through the ongoing pilot, authentic collaboration with children has ensured their views have directly informed content and approach.

In addition, The FA National Youth Council (FANYC) has continued to give young people a forum to impact change. The development of resources, combined with the FAYNC's annual leadership academy, is supporting young people to develop their confidence and skills, while reaffirming that their voice is valued, listened to, and makes a positive difference across the organisation.

County FAs have consistently enabled young people to contribute their views, in the knowledge that these will be listened to and lead to positive change. This has been evidenced through the NSPCC's independent safeguarding assessments of County FAs, as the NSPCC's Child Protection in Sport Business Manager, Laura Whapham explains:

"We have identified some excellent, sector-leading practice amongst the County FA network that is ensuring the voices of children and young people are reflected at all levels of the game. The breadth and innovation in support is a testament to work that the County FAs continue to provide."

We remain resolute in our commitment to work collaboratively with football and wider stakeholders to strategically identify opportunities to further embed 'listening to children' practices.





# **PROTECTION**

#### **STRATEGIC GOAL:**

To make the reporting of concerns as easy as possible, continue to build strong partnerships with statutory agencies, provide guidance on managing 'low-level concerns' and deliver robust case management by The FA.

#### What we said we'd do

- Continuing to investigate all safeguardingrelated allegations and concerns in line with internal policies and procedures.
- Refreshing our policy around 'low-level concerns', taking on board the learning from Clive Sheldon QC's Review as well as more recent publications to drive a safeguarding culture at all levels of the game.
   We will also continue to and learn from other sectors so we can assist clubs and organisations dealing with such concerns.

#### What's happened in the last 12 months?

- FA Board regularly apprised of statistics and analysis relating to Caseloads.
- All County FAs and National Associations that have had 'low-level concerns', have or are managing them with oversight of the NSPCC CPSU on behalf of The FA and where appropriate have escalated referrals to The FA.
- Some of our referrals, mirror Police reporting trends, and the progression of cases has been impacted by a continued delay in the court systems.
- 94% of referrals to The FA had an initial assessment within two working days of receipt.
- All cases assessed by The FA that met the threshold for referral to statutory agencies were referred.

- 'Low-level concerns'<sup>1</sup> (LLCs) that do not meet the threshold for referral
  to The FA continued to be managed by the County FAs and/or the
  clubs (with input from The FA as appropriate).
- An interim PowerApps solution was launched for County FAs to log all LLCs. 100% of County FAs and National Schools Football Associations are now using this or another approved system.
- The NSPCC CPSU, as the current Safeguarding 365 Standard Assessors, have been commissioned to regularly review the uploaded LLCs.
- Ongoing developments made to case management system to improve the efficiency and effectiveness of LLC case management for County FAs. Policy is being developed to coincide with the system development.

<sup>1</sup>A 'low-level concern' is a behaviour which falls below the standard required by a club as set out in their codes of conduct. Learning from survivors of non-recent sexual abuse in football has shown that often the abuse started as an LLC, normalising behaviour which is unacceptable.



Here are just some of the comprehensive suite of FA-produced safeguarding guidance notes, you can find them all **here**.

# **PROTECTION**

# (continued)

#### What we said we'd do

- 3. Continuing to deliver training on the types of concerns that must be referred to The FA, to all Designated Safeguarding Officers at County FAs/Affiliated Associations and men's and women's professional clubs (from the Premier League down to Step 4 and Tiers 1 and 2 of the women's pyramid).
- Constantly improving
   awareness of the ways to report
   safeguarding concerns via all
   lead football organisations.
- Utilising The FA's Quality
   Assurance Framework to provide insight and patterns of concerns about the referrals made into The FA and drive improvements in the way we manage concerns in football.
- 6. Continue to provide anonymised case data to Sport Englandfunded prevalence studies, to help gain a picture of the prevalence and type of concerns arising across sport.

#### What's happened in the last 12 months?

- The threshold for making a referral to The FA SCMT is as follows: An individual now or previously involved in football activity in any capacity has or is alleged to have:
- Been involved in the harm, abuse or exploitation of a child and/or AAR.
- Committed a criminal offence against or related to a child and/or AAR.
- Committed a sexual offence against anyone (adult or child).
- Behaved in a way that indicates they may pose a risk of harm to children and/ or AAR: or
- Been subject to two previous 'lowlevel concerns' and a further 'low-level concern' has been raised.
- Over the past two seasons, threshold

- training for Referrals' to The FA and statutory agencies has been delivered to representatives from the Premier League, Premier League Charitable Fund and Club Community and Organisations, EFL Championship and League One, EFL Trust and Club Community Organisations, Barclays Women's Super League and Barclays Women's Championship Clubs.
- Threshold training has continued to be delivered to all new County FA DSOs, Deputy DSOs, Senior Safeguarding Leads (SSLs) and Deputy SSLs every quarter.
- Emerging themes are being identified from referrals, to help shape ongoing training and CPD.

- We continuously strive to increase awareness through everything we do. These messages are core to:
  - All our safeguarding courses

     which reached 151k
     learners in 2022/23.
- The Play Safe campaign see pages 20-21.
- Increased liaison with statutory agencies with an updated version of The FA Statutory Agencies Guidance.
- All case work continues to be subject to quality assurance within our dedicated FA Safeguarding Quality Assurance Framework. A Lessons Learned model has been added to the existing Audit and Data Prevalence Models.
- This continues to support practice standards, internally and in relation to the quality of referrals received.
- The learning from the QA work is discussed during the season by the case management and preventative safeguarding teams, enabling the learning to help to shape relevant policy and procedures.

 In collaboration with Sport England and the NSPCC CPSU, we continue to provide anonymised safeguarding case management data to assist with the overall understanding of abuse concerns in sport.



#### Collaborating and learning from 'low-level concerns'

"Safeguarding is a real team effort at Northumberland FA," says their Designated Safeguarding Officer Gill Upperton, who has been in post for just over a year. She joined Northumberland from a local authority Early Help Allocations Team.

Gill works alongside the compliance team, which comprises the Discipline Officer, Football Services Assistant and the Head of Compliance – all using a shared software system to collate and track all safeguarding concerns, safeguarding compliance monitoring data and discipline cases.

"We discuss the content every week, giving due attention to new concerns and cases, assessing risk, and agreeing actions to mitigate this risk. By analysing the data from the shared system, we can identify any concerning trends, agree how we will focus resource to address this and discuss any matters that might need to be escalated to The FA, or reported to our Board."

The team reflects on lessons learned from low-level safeguarding concerns and poor-practice cases and uses this information to plan their ongoing learning and development offer for Club Welfare Officers. As Gill explains: "Last season we saw an increase in concerns involving conflicts between parents and coaches, which often led to pitchside issues and incidents.

"As a result, I developed and delivered online training for clubs, focusing on how to identify the early signs of potential conflicts and the importance of having robust club policies and codes of conduct in place. Collectively, these set and manage expectations about acceptable and unacceptable behaviours."

In turn, clubs now proactively reach out to Northumberland FA for advice and support to bring their safeguarding policies to life.

The joined-up internal approach also means swift identification of clubs who will receive an unannounced safeguarding visit – a requirement of The FA Safeguarding 365 Standard. Priority clubs are those where concerns have been raised, or non-compliance and poor-discipline behaviours have been highlighted.

"Our aim is to make Northumberland a safe and positive place for football to be played and experienced," says Gill. "We believe this data-led, cohesive approach is the best way to fulfil that goal."



### Case study, looking at:

#### Increasing awareness of how and when to refer concerns to The FA

Significant work has been undertaken in the last year by The FA Safeguarding Case Management Team (FA case team) to increase awareness of the ways of reporting concerns and the threshold for referral to The FA.

Specific work has been devoted to advising County FAs on the management of 'low-level concerns' (LLCs) and how they are recorded. LLC means behaviours which fall below the standard required by a club e.g., breaches of their codes of conduct. As such, LLCs are managed by clubs and/or County FAs and generally do not meet the threshold for referral to The FA.

As Sarah Walker, The FA's Head of Safeguarding Case Management explains, the threshold for making a referral to The FA case team is when: "An individual now or previously involved in football activity – in any capacity, has or is alleged to have:

- Been involved in the harm, abuse or exploitation of a child and/or adult at risk (AAR);
- Committed a criminal offence against or related to a child and/or AAR;
- Committed a sexual offence against anyone (adult or child);
- Behaved in a way that indicates they may pose a risk of harm to children and/or AAR; or
- Been subject to two previous 'low-level concerns' and a further 'low-level concern' has been raised.

Following some cases relating to allegations of offences by adults in football against other adults, an additional regulation was added to The FA Safeguarding Children Regulations and The FA Safeguarding Adult at Risk Regulations for the 2022/23 season. "This change to the

regulations is important because it enables our team of safeguarding

professionals, working alongside the statutory agencies, to consider these adult-on-adult cases and any transferable risk to the football setting," says Sarah.

To support understanding of the referral process and thresholds for referrals to The FA case team, training on referrals, as well as LLCs, has been delivered over the last two seasons to:

- · Clubs in the men's and women's professional game;
- The Premier League Charitable Fund and EFL Trusts and their Club Community Organisations.

This training also runs quarterly for all new County FA staff in designated safeguarding roles.

#### Regulation 1.6 states:

A Participant must immediately report to The Association any alleged incident, facts or matters regarding potential abuse or harm against a child, or any sexual offence against anyone (whether an adult or child). Any failure to do so may amount to Misconduct.

#### 17 - SAFEGUARDING CHILDREN **REGULATIONS**

THE ASSOCIATION'S SAFEGUARDING CHILDREN REGULATIONS

#### PREAMBLE

This Preamble is provided for guidance. If there is any inconsistency between the Preamble and the operative part the Safeguarding Children Regulations below, the operative parts shall prevail.

As set out in The Association's Safeguarding Children Policy, The Association is committed to safeguarding children within football and has Case Management procedures in place to assess the risk of harm that individuals may pose to

In assessing that risk, children's welfare is the paramount consideration

one or more of the following applies:

- (i) The individual fails to comply with any part of The Association's Criminal Records Check (CRC) process
- The individual has been barred by the Independent Safeguarding Authority (ISA) or the Disclosure and Barring Service (DBS) from engaging in regulated activity relating to children:
- The individual has been disqualified from working with children under the Criminal Justice and Court Service
- The individual is subject to any other restriction on their involvement with children not within (ii) or (iii) made pursuant to statute:
- The individual has been convicted of, or made the subject of a caution for, an "Offence" defined in Regulation
- Following a risk assessment, The Association is satisfied that the individual poses or may pose a risk of harm to
- Following a risk assessment. The Association is satisfied that the individual is or was in a position of trust in relation to another person and has engaged in sexual activity and/or an inappropriate relationship with that person

In these Regulations the expression "Offence" shall mean any one or more of the offences contained in the Schedules of the Criminal Justice and Court Services Act 2000 and any other criminal offence which reasonably causes The Association to believe that the person accused of the offence poses of may pose a risk of harm to a child or children.

> The expression "position of trust" shall mean any position where an individual is in a relationship of trust with any person with responsibility and / or authority in relation to that person, and shall include without limitation those who care for, advise, supervise, train, coach, teach, manage, tutor, mentor, assess, develop, guide, treat or provide therapy to children and young people

- The Safeguarding Review Panel shall determine its own procedures save that in making findings of fact the test that the Safeguarding Review Panel shall apply shall be the civil standard of the balance of probability. Where a case is referred to the Safeguarding Review Panel pursuant to these Regulations it shall have the discretion to depart from the procedures set out in these Regulations where it considers it appropriate to do so
- 1.3 The actions that may be taken under these Regulations by a Case Manager may also be taken by the





# **OUR YEAR 3 TARGETS**

#### 1. LEADERSHIP AND GOVERNANCE

- Build collaboration and enhanced support for Board Leads.
- Continue to provide support for survivors of child abuse in football.

#### 2. STANDARDS

- Ensure FA continues to demonstrate its safeguarding practice and culture meets the NSPCC CPSU standards.
- Work towards achieving the Ann Craft Trust Safeguarding Adults Standards.
- Assess remaining 26 County FAs and National Associations to ensure they are maintaining the Safeguarding 365 Standard.
- Ensure all Barclays Women's Super League and Barclays Women's Championship Clubs meet all licence requirements and seek greater alignment with men's pro game standards.

- Support National League System (Steps 1-4) leagues, the Women's National League and respective clubs to prepare to implement a new safeguarding standard.
- Continue to deliver safeguarding training for those in designated safeguarding roles.
- Drive safeguarding compliance and practice in grassroots youth and adult clubs, including the greater transparency of policies by sharing them with club members and parents.

#### 3. PREVENTION

- Continue to deliver safer recruitment guidance and DBS checks.
- Continue to risk-assess and deliver safeguarding plans for all FA, Wembley and major tournament events.
- Continue to drive campaigns to tackle poor behaviours and raise awareness of parents to ask safeguarding questions in the different settings their children play football, including via private coaching providers.
- Deliver third Play Safe-branded National Safeguarding Weekend September/October 2023.
- Increase awareness of the Play Safe campaign and messaging from 47% to 65%.
- Aligned with overarching FA strategy, make progress in relation to a process for clubs to self-audit their safeguarding practice and culture.



# **OUR YEAR 3 TARGETS**

#### 4. EDUCATION AND EMPOWERMENT

- Drawing on research, deliver 5-year 'Voice of Child' strategic approach to centralise children's voices, including aligning child-friendly resources for U18 players, with messaging children receive in schools.
- Launch new resources for those running adult open-age clubs and leagues.
- Continue to promote the Safeguarding Awareness course for parents/carers, seeking 100,000 completions by the end of 2024.
- Deliver safeguarding resources and messaging for adult players.
- Deliver refreshed FA staff e-learning course, and continuous roll out of internal briefings and training.
- Review and update as appropriate our Safeguarding Children, Safeguarding Adults and Welfare Officer Course.

#### 5. PROTECTION

- Continue to Investigate all safeguarding allegations and concerns in line with internal policies and procedures.
- Drive greater consistency with the management of 'low-level concerns' reported to County FAs and related support and guidance to grassroots clubs.
- Continue to deliver threshold training on a quarterly basis to County FA safeguarding leads and to National League System (Steps 1-4).
- Review Adults at Risk Policies and Regulations.
- Ensure our quality assurance work continues to drive best practice in The FAs management of safeguarding cases.



# REPORTING CONCERNS

Anyone who has a safeguarding concern related to a child and/or adult at risk, including child-on-child abuse, or the behaviour of an adult towards an under-18-year-old, or an adult who may be at risk of harm in football, must refer it to The FA's safeguarding team.

Anyone who is concerned about misconduct between adults in grassroots football should report the concerns to their County FA and in men's and women's professional football should report their concern to The FA Integrity team via <a href="mailto:integrity@TheFA.com">integrity@TheFA.com</a>

The safeguarding and integrity teams are staffed by professionals who are experienced in dealing with these concerns.

It is important to state that anything urgent, where there may be an immediate risk of harm to a child, or an adult at risk, must be reported to the police, children or adult social care in your area.

Referring non-immediate risk of harm concerns can be done via a club, league or County FA/Affiliated Association – all have a Designated Safeguarding Person. Alternatively, The FA can be emailed directly at Safeguarding@TheFA.com

If clubs or the County FA DSO cannot be contacted, call the NSPCC Helpline for expert advice and support on 0808 800 5000 or email <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>

Concerns that someone may be behaving inappropriately or seeking to groom a child in an online environment should be reported to <a href="https://www.ceop.police.uk/safety-centre">www.ceop.police.uk/safety-centre</a>. Reports made there will be directed to the team at the National Crime Agency. The relevant County FA should also be informed, or The FA at <a href="mailto:Safeguarding@TheFA.com">Safeguarding@TheFA.com</a>

Victims of non-recent abuse in football should contact the NSPCC or The FA at **Safeguarding@TheFA.com** 

If a child or young person or adult is in immediate danger, the advice is ALWAYS to call 999.

#### WHISTLE-BLOWING

Whistle-blowing in a safeguarding context means revealing and raising concerns over misconduct or malpractice within an organisation, or within an independent structure associated with it.

It can be used as an early-warning system or when it's recognised that appropriate actions have not been taken. This approach or policy is adopted in many different walks of life.

 Any adult or young person with concerns about a colleague's conduct towards a child or young person can also use whistleblowing by emailing The FA's Safeguarding Team at: <u>Safeguarding@TheFA.com</u>

Alternatively, whistle-blowing concerns can be reported:

- Direct to the local Police or Children's Social Care services, or
- the NSPCC Child Protection in Sport Unit at <a href="mailto:cpsu@nspcc.org.uk">cpsu@nspcc.org.uk</a>, or
- The NSPCC Helpline on 0808 800 5000 or email: help@nspcc.org.uk

## FOR FURTHER INFORMATION

To find out more about safeguarding measures in football – and in general – please contact the organisations below. All relevant phone numbers and email addresses can be found by visiting the specific organisation's website.

FOR ALL	www.TheFA.com/football-rules-governance/safeguarding
COUNTY FOOTBALL ASSOCIATIONS	A list of all County FAs and contact details is available <a href="here">here</a> . Click on the specific County FA website to obtain the email address of the County FA Designated Safeguarding Officer (DSO).
Premier League	www.premierleague.com/safeguarding
EFL	www.efl.com/-more/governance/safeguarding
Professional Footballers" Association	www.thepfa.co.uk Note – services only available to PFA members
LMA  LEAGUE MANAGERS  ASSOCIATION	www.leaguemanagers.com Note – services only available to LMA members
PROFESSIONAL GAME MATCH OFFICIALS	www.premierleague.com/referees  Note – services only available to PGMOL members

To read about football's overarching safeguarding framework and football bodies' responsibilities and accountabilities, see pages 36 to 40 inclusive of Building an Ever-Safer Culture, The FA Safeguarding Strategy to 2024. You can find it <a href="https://example.com/here-safeguarding-safegu

Childline ONLINE, ON THE PHONE, ANYTIME	www.childline.org.uk
NSPCC	www.nspcc.org.uk
Child Protection in Sport Unit	www.thecpsu.org.uk
CEOF	www.ceop.police.uk/safety-centre

#### **ADDITIONAL SERVICES FOR SURVIVORS**

#### **The PFA Survivor Support Advocate**

Survivor Support Advocate offering support and signposting for victims of all forms of child abuse in grassroots and professional football.

E: SupportAdvocate@thepfa.com

#### The FA Benevolent Fund

Apart from its general remit, the Fund has provided financial assistance to survivors and is open to new applications. You can read more about the Fund and football's other discretionary funding sources **here**.

E: benevolentfund@TheFA.com





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