



GUIDANCE NOTES NO:

1.11

ENGLAND WOMEN: SAFEGUARDING POLICY AND PROCEDURES

FOR ALL

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SECTION 1:

DEFINITIONS AND TERMS USED IN THIS POLICY

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DEFINITIONS AND TERMS USED IN THIS POLICY

Abuse¹

Abuse of a Child - A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear, or experience its effects. Children may be abused in a family or in an institutional or extra-familial contexts by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.

Adult Abuse²

Abuse can be defined as a violation of an individual's human and civil rights by any other person or persons. It includes acts of commission (such as an assault) and acts of omission (situations where the environment fails to prevent harm). Abuse may be a single act or omission or a series of acts or omissions.

Adult²

A person aged over 18.

Adult at Risk of Harm (or adult at risk)²

A person aged 18 or over who:

- Has need for care and support and:
- Is experiencing, or at risk of abuse or neglect, and:
- As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

¹ Working Together to Safeguarding Children (2023) <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

Child³

Means anyone who has not yet reached their 18th birthday.

Child Protection⁴

Part of the safeguarding process requiring immediate action to protect an individual that has experienced or has been identified as being at risk of experiencing – significant harm or abuse.

Consent

Consent is the action by which an individual gives permission for something to happen or agreement to do something.

Consent is not given for ever and is only relevant at the point of being expressed and may be for a specific reason only. Consent also applies to principles relating to obtaining permission for photography and filming, which may be sought directly from players, and in the case of children, from their parents/carers.

Disclosure and Barring Service (DBS)⁵

Refers to the executive non-departmental public body, sponsored by the Home Office, and established to help organisations make safer recruitment decisions by processing and issuing DBS checks for England, Wales, the Channel Islands and the Isle of Man. DBS also maintains the adults' and children's Barred Lists and determines whether an individual should be included on one or both of these lists and is therefore barred from engaging in certain regulated activity.

² The Care Act (2014) <https://www.legislation.gov.uk/ukpga/2014/23/contents>

³ Keeping Children Safe in Education (2024) <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

⁴ NSPCC CPSU <https://thecpsu.org.uk/help-advice/introduction-to-safeguarding/what-is-safeguarding/>

⁵ <https://www.gov.uk/government/organisations/disclosure-and-barring-service>

SECTION 1:

DEFINITIONS AND TERMS USED IN THIS POLICY (CONTINUED)

Colleagues

For the purposes of this policy, this term refers to any FA full or part time person (whether paid or unpaid), volunteers, casuals, consultants and those providing a contracted service.

England

England Women's National Teams and Future Lionesses Events including; England Senior/U23 Women, England Development Teams, England Talent Pathway and other events organised on behalf of England Women's Teams and/or Women's Technical Division.

Event

Relates to camps and activities taking place under the responsibility of England or Women's Technical.

Event Designated Safeguarding & Welfare Lead (DSWL)

Refers to the individual allocated to undertake designated safeguarding responsibilities in an operational role, in an England Event environment.

Low Level Concerns and Poor Practice

Concerns arising from behaviours or actions which could be described as poor practice, which falls below the standard required by The FA as set out in expectations of acceptable behaviours and conduct. Whilst the behaviour may not be immediately dangerous or intentionally harmful it does set a poor example and if it were to continue, it might lead to harm or put an adult at risk or child at risk of harm. A low-level concern may also relate to a concern about the wellbeing or welfare of an individual participant. Failure to challenge low-level concerns can create an environment where unacceptable behaviour is normalised and where abuse could subsequently take place. Whilst the behaviour may not be immediately dangerous, survivors of non-recent sexual abuse in football describe how abuse often started as a low-level concern.

Non-recent

Non-recent child abuse is when an adult was abused as a child. Non-recent is the preferred term (not historic), to use with adult victims/survivors because it recognises that whilst the abuse may have been some time ago, the impacts of the abuse may continue to be present for the person.

Protected Characteristics

As defined under the Equality Act 2010: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

Regulated Activity in Football

Includes managing, training, coaching and supervising as well as giving advice or guidance on wellbeing, caring for children or driving a vehicle solely for children on behalf of a club or organisation.

Safeguarding and Promoting the Welfare of Children⁶

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and
- Taking action to enable all children to have the best outcomes.

⁶ Keeping Children Safe in Education (2024) <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

SECTION 1:

DEFINITIONS AND TERMS USED IN THIS POLICY (CONTINUED)

Safeguarding Adults⁷

Safeguarding is defined as the protection of a person's health, wellbeing, and right to live in safety, free from harm, abuse, and neglect. The term 'Safeguarding Adults' refers to all work done to help adults with care and support needs stay safe from abuse and neglect.

UN Convention on The Rights of the Child (UNCRC) The United Nations Convention on the Rights of the Child (UNCRC) is a legally binding international agreement setting out the civil, political, economic, social and cultural rights of every child, regardless of their race, religion or abilities.

Welfare and Wellbeing

Describes a person's health, happiness, safety, prosperity, and general wellbeing.

Mental Wellbeing

Describes the wider set of feelings and thoughts that influence emotions and day-to-day behaviour. Having good mental wellbeing can strengthen a person's resilience to developing a mental health problem – or help a person cope better with an existing mental health problem.

A person's mental wellbeing can change, from day-to-day, month-to-month or year-to-year. They may:

- Feel relatively confident in themselves – they value and accept themselves and judge themselves on realistic and reasonable standards;
- Feel and express a range of emotions;
- Feel engaged with the world around them – they can build and maintain positive relationships with other people and feel they can contribute to your community;
- Live and work productively;
- Cope with the stresses of daily life and manage times of change and uncertainty.

⁷ NICE – National Institute for Health and Care Excellence <https://cks.nice.org.uk/topics/safeguarding-adults-in-care-homes/background-information/safeguarding-definition/>



SECTION 2:

OUR SAFEGUARDING COMMITMENT

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Every player involved in our England Team's and Talent Pathway has a right to a safe and positive experience. Supporting our players to thrive in high-performance environments and taking prompt action when required, is of paramount importance to everyone involved in delivering our programmes and activities.

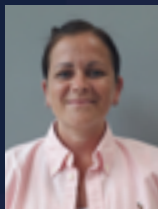
We expect everyone that works with our players and our wider support team to uphold our safeguarding policy, ensuring we have a robust framework in place to deliver on this commitment.

Safeguarding is a non-negotiable foundation of everything we do.

Our responsibility is to create, maintain and promote a safe and positive environment across all levels of football, alongside swiftly and effectively managing any safeguarding concerns that arise. This work is core to our new Safeguarding Strategy 2024-28, which continues to drive enhancements to our safeguarding standards and practices across the game.

As part of our commitment, we ensure that all FA colleagues and consultants within our England camps and activities are well informed of our Policy, Procedures and Safer Working Practice to ensure they are applied consistently.

Thank you for ensuring that you play your part.



Kay Cossington MBE

FA Women's Technical Director



Mark Bullingham

FA Chief Executive



SECTION 3:

SAFEGUARDING FRAMEWORK

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SAFEGUARDING FRAMEWORK

This Safeguarding Policy establishes the framework for the safeguarding of all children and adults (including adults at risk) involved with events involving or on behalf of England.

The FA is fully committed to ensuring we provide a safe, fun and inclusive environment for all. To support this approach, we have bespoke policies and guidance for our England environments which are aligned to:

- UK Legislation and Statutory Guidance relating to children and adults at risk.
- The FA's Safeguarding Children Regulations and the Affiliated Footballs Safeguarding Children Policy.
- The FA's Safeguarding Adult at Risk Regulations and the Affiliated Footballs Safeguarding Adults Policy.
- Sport England – NSPCC Child Protection in Sport Unit (CPSU) Standards for safeguarding and protecting children in sport.
- Ann Craft Trust – Safeguarding Adults in Sport Framework.
- FIFA Guardians' Child Safeguarding Toolkit and the UEFA Child Safeguarding Policy and guidance for safer event delivery.

In line with legislation, statutory guidance and industry best practice, The FA sets out the safeguarding rules, regulations, policies, standards and requirements that must be met at every level of the game to safeguard children and adults at risk.

The FA's regulatory framework means that it has the power to investigate safeguarding concerns and act against any individual or club who breaches its safeguarding policy and/or regulations. This is in addition to the broader

organisational and employment responsibilities which The FA has in relation to those employed or deployed on its behalf. More information on The FA's safeguarding framework can be found [here](#).

3.1 SAFEGUARDING TEAM

The FA has a team of safeguarding professionals who lead and drive safeguarding across football and internally within The FA.

- Part of the team (referred to as **Safeguarding Team**) leads The FA's preventative safeguarding approach across all levels of football. This includes strategy, policy, standards, safeguarding education, guidance and supporting the embedding of safer working practice. Individual team members have specific responsibilities for areas of football, including England Teams and Pathway events, leading the development of safeguarding plans, supporting colleagues with how to undertake risk assessments for camps, events and activities and advising and guiding the management of concerns and issues involving England.
- In parallel, the **Safeguarding Case Management Team** manages referrals and reported child and adult at risk protection concerns within football in accordance with The FA's Safeguarding Children and Adult at Risk Regulations. They assess individuals who pose, or may pose, a risk of harm within football and put in place safeguards where proportionate. These include suspensions from football environments.
- If there are concerns about individuals who are also colleagues, the safeguarding teams also work closely with The FA's Human Resources Team (HR).

SECTION 3:

SAFEGUARDING FRAMEWORK (CONTINUED)

3.2 THE FA'S SAFEGUARDING STRATEGY 2024-28, INCORPORATES OUR SAFEGUARDING WORK IN THE ENGLAND TEAM AND PATHWAY ENVIRONMENTS

Governance and Standards

We will:

- Build a safeguarding culture through all England activity, with safeguarding regularly featuring on the Women's Technical Senior Leadership's agenda.
- Annually collate and analyse safeguarding concerns, incidents, and trends, implementing any recommendations and learning accordingly.
- Ensure safeguarding risks are addressed through relevant Risk Registers and where relevant, raised with FA SMT (Senior Management Team) and Board.
- Develop and implement safeguarding policies, procedures, systems, risk assessments and plans and safer working practice guidance.
- Publicise the safeguarding policy via TheFA.com/safeguarding and communicate related guidance via The FA's intranet.
- Implement tailored Safeguarding Risk Assessments, Safeguarding and Welfare Plans for tournaments and England activity.
- Appoint a named Designated Safeguarding & Welfare Lead for all England events (training camps, fixtures, regional activity etc).
- Support a culture of continuous improvement of safeguarding delivery across England activity.

- Implement robust safer recruitment processes, including the use of Disclosure and Barring Service Checks (DBS) and other vetting checks e.g., in-person interviews, references, and professional qualification and registration checks.
- Ensure that specific members of The FA's Safeguarding Team lead and support safeguarding with England, working closely with the Women's Technical Division Senior Leadership Team, departments and individuals to ensure safeguarding is embedded across England.

Education & Empowerment

We will:

- Guide on appropriate behaviours, deliver safeguarding induction training and ongoing training and briefings to those working with England.
- Provide resources and regular briefings to support players, parents and carers understanding and awareness of safeguarding when on international duty.

Managing Concerns

We will:

- Provide escalation routes into the Safeguarding Team to ensure consistent handling of safeguarding concerns and incidents during camps and events.
- Communicate clear reporting processes to ensure all colleagues and players are enabled to report concerns quickly and effectively.



SECTION 4:

DELIVERING SAFE AND INCLUSIVE ENVIRONMENTS

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4.1 SAFEGUARDING RESPONSIBILITIES

This policy applies to all FA Group colleagues (full- and part-time, including agency workers and casual colleagues, consultants, contractors, and volunteers – and any other individual employed or engaged by or on behalf of The FA Group) when working directly with, or in activity involving, or on behalf of England. We have a responsibility to safeguard and promote the welfare of children and adults involved with England activity and events and we need all our colleagues, partners and suppliers to apply safeguarding consistently and effectively.

It's vital that we all understand our collective and individual safeguarding responsibilities when working with England. **Individually we all have a responsibility for safeguarding. This means when working with England you should:**

- Know what to do if you have a safeguarding concern.
- Be clear what The FA expects in terms of your role, behaviour and conduct.
- Be familiar with the safeguarding reporting procedures and with whom to raise any concerns.
- Be willing to learn, receive training and support to enhance understanding of The FA's safeguarding requirements.

4.2 SAFE AND INCLUSIVE CULTURE

Children and adults involved with England have the right to be heard and be involved in decisions which may affect them. A listening, player-centred culture is integral to ensuring The FA can provide an environment where players can learn and develop within an elite sport and have a positive experience.

We will:

- Actively seek informal and formal opportunities to obtain feedback from players (and their parents/carers where appropriate) about their experiences. This includes event feedback discussions, surveys and questionnaires etc.
- Ensure we obtain the necessary consents from the players and parents/carers in respect of under-18s' participation in activity/photography/imagery when involved with England.
- Develop partnerships with parents/carers of under-18s (and where relevant carers of adults at risk), and their agencies, including education providers, players' parent clubs, host families etc., ensuring we can provide timely and consistent support where required.
- Seek to always act in the best interests of the player and will seek their views in any decision-making process and, where appropriate, the views of their parents and/or carers.
- Deliver events in accordance with safer working practice guidance.
- Embed safeguarding into strategies, policies, guidance and delivery plans across internal departments and teams working with England.
- Uphold FA Safeguarding Regulations, including FA Rule E14, which sets out a duty to report a potential or actual breach of The FA Safeguarding Children Regulations and/or the Adults at Risk Regulations.
- Ensure the Safeguarding Team are involved at the earliest possible stage in project development to ensure that safeguards are embedded throughout the process.

SECTION 4:

DELIVERING SAFE AND INCLUSIVE ENVIRONMENTS (CONTINUED)

4.3 SAFER WORKING PRACTICE

Colleagues working directly with England are provided with guidance via this policy, training and specific Safer Working Practice Guidance to support the safer delivery of England Events, including, training, fixtures and tournament events, travel, overnight stays and lone working.

This guidance and supporting Safeguarding Risk Assessment and Safeguarding/Welfare Plan templates are available via The FA's intranet. All colleagues working with England should familiarise themselves with these resources and understand how to implement them.

4.4 SAFER RECRUITMENT

The FA is committed to recruiting safely and fairly. Colleagues working with England will be recruited in accordance with The FA's HR Recruitment and Employment Policies which include Safer Recruitment practices. This includes the use of interviews, references, professional qualification and registration checks and other relevant vetting checks. All roles will be offered on a 'subject to' basis enabling full recruitment and vetting processes to be completed prior to any decision to employ, deploy or engage an individual's services.

Those who are directly employed/deployed by The FA to work with England Teams will be subject to a vetting process at the appropriate level:

- Those in regulated activity with children will be subject to an FA Enhanced Disclosure and Barring Service Check (with a check of the children's barred list), on appointment and thereafter every three years.
- Those in applicable professional roles registered with the Health Care and Professions Council (HCPC) and General Medical Council (GMC) will be subject to an FA Enhanced Disclosure and Barring Service Check (with

a check of the children's and adults barred list), on appointment and thereafter every three years.

- Where applicable, The FA will use Standard DBS Checks for eligible roles.
- All other roles working around England, who do not meet the eligibility criteria for an enhanced or standard level check, will be subject to a Basic DBS Check.



SECTION 4:

DELIVERING SAFE AND INCLUSIVE ENVIRONMENTS (CONTINUED)

4.5 SAFER PROCUREMENT AND ENGAGEMENT OF THIRD PARTIES

Partners, suppliers and commissioned services, working with England, are required to adhere to this Safeguarding Policy. The manager responsible for engaging any organisation or person in this capacity must ensure they are provided with access to this safeguarding policy.

We expect our partners to uphold our high standards and have their own appropriate safeguarding policies and procedures in place, including for the reporting and handling of concerns in relation to their own delivery (where applicable) and Safer Recruitment Policies (where relevant).

In a case of a dispute in relation to England activity and Events – The FA's Safeguarding Policies, Procedures and Regulations will take precedence over any third-party policy.

Where The FA commissions or contracts a service to work with England, the relevant manager must ensure that safeguarding responsibilities and arrangements are clarified within any contract or Service Level Agreement (SLA). Advice can be sought from the Safeguarding Team with regards to specific safeguarding requirements.



SECTION 4:

DELIVERING SAFE AND INCLUSIVE ENVIRONMENTS (CONTINUED)

4.6 SAFER EVENTS

All camps, tournaments and events/activities delivered by or on behalf of England and the broader England Women's Technical Team, must have appropriate arrangements in place, as described below, to ensure the safety and wellbeing of all who engage with these activities.

Camps, events and fixtures must have as a minimum requirement:

- Travel and Safety/Security Risk Assessments (England Teams).
- A safeguarding and welfare plan which addresses how safeguarding matters will be addressed for the particular context of the event and safeguarding risk assessment, ensuring activities are planned, risks identified, and mitigations put in place.
- A named Event Designated Safeguarding & Welfare Lead (Referred to as Player Engagement Lead or Welfare Lead in Talent Pathway events).

The Safeguarding Team must be consulted at the earliest possible stage (a minimum of six weeks from a one-off event event) to discuss specific arrangements. Each activity/event must be assessed on its own merit as requirements may exceed the requirements above.





SECTION 5:

APPROPRIATE BEHAVIOURS & ABUSE OF TRUST

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Everyone working with children and adults in an England context is responsible and accountable for the way in which they behave towards them. Everyone has a right to be treated with respect and dignity.

Harming or abusing a child or adult is never acceptable under any circumstances. All concerns of harm or abuse must be reported to The FA's Safeguarding Case Management Team and the Safeguarding Team, in line with our reporting procedures, who will then refer the matter, where relevant, to The FA's HR team and Statutory Agencies. Concerns relating to adult misconduct concerns should also be reported to The FA's Integrity Team.

Poor practice is unacceptable in football and must be treated seriously with appropriate actions taken and in accordance with procedures for handling Low-Level Concerns.

It is expected that all colleague-player relationships maintain clear and appropriate boundaries at all times, are supportive, positive and aimed at improving the players' skills, development and progress. Colleague-player relationships should all focus on the respective activity/event.



SECTION 5:

APPROPRIATE BEHAVIOURS & ABUSE OF TRUST (CONTINUED)

5.1 APPROPRIATE BEHAVIOURS

This policy sits alongside The FA's Colleague Codes of Conduct, inc. Anti Harrassment Policy, Colleague Handbook and Dignity at Work Policy. All internal FA policies are available on The FA's intranet. The following detail, specifically refers to expectations about colleagues and partners contact with children and adults involved with our England Teams. All colleagues must demonstrate exemplary behaviour when providing services, support and assistance to all children and adults, to ensure their safety and welfare.

The FA has a zero-tolerance approach to bullying, harassment, victimisation and all forms of discriminatory behaviour.

Please be aware that breaches of this policy may:

- Be classed as a disciplinary offence which will be dealt with under The FA Group's Disciplinary Procedure via The FA HR team (and for third party partners, a review of the contract for services).
- Also result in a referral as a serious safeguarding or misconduct concern or repeated/frequent Low-Level Concerns, to The FA's Safeguarding Case Management Team and/or The FA's Integrity Team.
- Be a criminal offence or a serious safeguarding matter, which will be referred to statutory agencies e.g., the DBS, children's social care, LADO, the police, etc., or other professional regulatory bodies.

The following sets out the expectations of all colleagues involved with England:

- Always work in an open environment with players, avoiding private or unobserved situations. Where your role specifically requires one-to-one

contact e.g. medical treatment, only carry out duties with the consent of the adult player and in regard to children, their responsible adult (e.g. parent, carer, coach).

- Ensure you are polite and courteous and use only appropriate behaviour and language.
- It is an offence for a colleague to knowingly allow a child to purchase or consume alcohol, or other illegal substances while on England duty (Licensing Act 2003). Colleagues shall immediately report any such offence or incident to their manager and the Safeguarding Lead for the event or directly to the Safeguarding Team.
- When working within an England event environment, colleagues must be mindful that their responsibilities to supervise and care for children and be available to support adult players, continues throughout the period of activity.

Therefore, with regards to Future Lioness Events and Development Teams, alcohol may not be consumed at these events except in exceptional circumstances, which must be fully risk-assessed by the Head Coach and Women's Technical Director who must ensure there are a sufficient number of colleagues available who will not consume alcohol and are enabled to supervise/support players including in a medical emergency.

With regards to under-23's and Seniors, supervision and care arrangements must be considered and risk-assessed by the Head Coach/Women's Technical Lead and Women's Technical Director, for the event/activity who must ensure there are a sufficient number of colleagues available who will not consume alcohol and are enabled to supervise/support players including in a medical emergency.

SECTION 5:

APPROPRIATE BEHAVIOURS & ABUSE OF TRUST (CONTINUED)

- Treat all players equally, with respect and dignity and avoid favouritism. Always put the welfare and safety of players first.
 - If a player is involved in an accident, you must request the assistance of another colleague as soon as possible, call for medical assistance (following the relevant emergency procedures) and ensure you notify your supervisor and/or Line Manager. If the parent or carer of a child is not present when the incident occurs, they should be contacted as soon as possible.
 - Complete FA Safeguarding E-Learning Modules and participate in FA safeguarding training and briefings, as well as ensuring you are familiar with each England Event's Safeguarding Risk Assessment and Safeguarding and Welfare Plan.
 - Colleagues should always be player-centred and promote a fun, safe environment.
 - Adhere to FA Safeguarding Policy and Procedures, Safer Working Practice Guidelines, including appropriate communications with players.
 - Report all safeguarding concerns to the relevant safeguarding lead for the event or directly to the FA Safeguarding Team and/or FA Safeguarding Case Management Team.
- You should never:**
- Allow or engage in any form of inappropriate physical contact.
 - Allow anyone to use inappropriate language unchallenged.
 - Reduce a child or adult to tears as a form of control.
 - Make inappropriate and/or sexually suggestive comments in any way, to a player (or in the presence of a child) e.g., face-to-face, e-mail, phone, text or via social media.
 - Use any personal form of social media or personal mobile or other device to contact a child.
 - Arrange to meet a child or adult at risk on your own, away from an England or Club environment.
 - Contact with a child must always be via a child's parent/carers or parent club. All communications must be in line with Safer Working Practice guidelines.
 - Take, display or distribute (including via social media) images, AI-generated images or video footage of a child or adult without their knowledge or without agreement of the relevant FA department and a child's parent/carers.
 - Use FA equipment (including Wi-Fi) or personal devices (when on England duty), to access pornography or illegal material.
 - Fail to act upon and record any safeguarding or welfare concerns you witness, or allegations or information you may receive.
 - Do things of a personal nature for children that they can do for themselves.
 - Allow incidents of hazing to go unreported.

NB: It may sometimes be necessary for colleagues to assist children, particularly if they are young or have disabilities. These tasks should only be carried out with the understanding and consent of the individual, and with the agreement of their parents/carers.

SECTION 5:

APPROPRIATE BEHAVIOURS & ABUSE OF TRUST (CONTINUED)

5.2 ABUSE OF TRUST

5.2.1 Position of Trust

The Sexual Offences Act 2003 (updated June 2022) recognises that adults in certain roles in sport (where adults are caring for, advising, supervising, instructing, training, coaching, teaching, managing, tutoring, mentoring, assessing, developing, guiding, treating, or providing therapy) are in **positions of trust** as they have power and influence over young people they work with.

This law relates to **16 and 17-year-olds** (it is already established in law that sexual activity with children aged under 16 is illegal). It is a criminal sexual offence and breach of FA regulations for anyone in such a role to engage in sexual activity or have an inappropriate relationship with a 16 or 17-year-old notwithstanding that the age of consent is 16.

For the avoidance of doubt, no intimate or sexual relationship should take place with a child while the colleague is in a position of trust. Such a relationship is unlawful, irrespective of gender and sexual orientation. Where a position of trust exists, it does not make any difference whether or not the relationship is consensual. The imbalance of power makes it an abuse of the position of trust.

Therefore, if you engage in an intimate or sexual relationship with a player aged 16 and 17 it is a breach of The FA's Regulations and as such may result in disciplinary action and a referral will be made to the statutory agencies, including the Police, and applicable Local Authority bodies, and the Disclosure and Barring Service (DBS) and where relevant, professional registration bodies.



SECTION 5:

APPROPRIATE BEHAVIOURS & ABUSE OF TRUST (CONTINUED)

5.2.2 ADULT COLLEAGUES/ADULT PLAYER – RELATIONSHIPS OF TRUST (ADAPTED FROM GUIDANCE DEVELOPED BY THE ANN CRAFT TRUST)

As detailed above, Legislation relating to Position of Trust relates to adults in a position of influence, responsibility and the power imbalance that exists between adults and those aged 16/17 years.

We recognise that the dynamic between those who coach, teach, train, supervise and/or instruct adult players is a unique and often complex one. The professional relationships which develop when working in a high pressure, elite sport environment, spending significant periods away from home in the UK and abroad mean that these relationships can include high levels of trust, closeness, connection and influence. These circumstances mean that the boundaries between personal and professional relationships can become blurred and that intimate relationships may develop.

Adults have ‘self-determination’, i.e. the right to make their own decisions even if someone else considers it to be an unwise decision. There are no laws that prevent two adults entering into an intimate relationship with each other assuming they both consent to the relationship.

There are people who will abuse their role, position of trust, power and/or influence to the detriment of another for their own personal gain. Relationships may be formed through grooming, controlling or exploitative behaviours – resulting in an unhealthy, abusive relationship. Such a relationship may be formed in ‘plain sight’ of others or kept hidden and it can often be difficult for someone within such a relationship to feel able to end the relationship or be able to recognise it as unhealthy or abusive. It may be only after a period of reflection or after a relationship ends that such behaviours are recognised. The risks and behaviours may involve:

- Grooming.
- Coercive control.
- Exploitation of position of power, trust and influence.
- Perpetration of Abuse – for example sexual, emotional or financial.
- Exploitation of the drive to ‘be the best’.

5.2.3 Reporting Adult Relationship of Trust Concerns

In such circumstances that an intimate relationship between a colleague and an adult player were to develop, this should be declared to the Women’s Technical Director by the staff member.

Concerns relating to the risks and behaviours outlined in 5.2.1 and 5.2.2 must be referred into HR, Safeguarding Team, Safeguarding Case Management and Integrity Teams.

5.3 PLAYER BEHAVIOURS

All colleagues working with England have a responsibility to encourage positive player behaviour and address challenging behaviour.

Specific information is provided to players (and their parents/carers) at the point of a call-up to international duty. This includes guidance around expected behaviours and information around what items are acceptable and unacceptable to bring into an event environment.

In an event environment, players will be involved in establishing a Code of Conduct, ensuring they feel part of the process and use relevant language and terminology, applicable to the context of the event/activities involved. The staff team should support the players in developing a Code of Conduct for the season and that this is reviewed on an ongoing basis across events with the players. The Code of Conduct should address the following principles:

SECTION 5:

APPROPRIATE BEHAVIOURS & ABUSE OF TRUST (CONTINUED)

- For new players and particularly for development teams and player pathway events, the experience of being away from home in an elite environment may be exciting but an anxious time for some. There should be recognition that some players may need additional support from time to time.
- All players are different, with different life experiences, challenges, and individual needs, but as a team no one person's view should outweigh others.
- The views of players are important and the staff will ask players to give regular feedback and will listen to players to address concern or worries.
- Players should look out for each other and speak to a member of the staff team if they are worried about something or someone.
- That bullying and hazing in any form, whether online, via electronic communication mechanisms or in person is always unacceptable.
- That all players are expected to be professional and that relationships between players beyond friendships can have an impact on team dynamics. This means arrangements for the delivery of an England event may need to consider specific issues around such matters e.g. rooming arrangements. Any arrangements would also consider the age of the players involved e.g. under-18s and under-16s.
- Adult players must ensure that a member of the staff team is informed of their whereabouts and expected time of return if leaving an event environment. As a general principle, players aged under 18, must not leave the site unaccompanied by less than two staff members for any reason. at any time. Each Camp or event risk assessment will need to consider this in respect of individual countries/context of the camp or tournament as to where there may be parameters for remote supervision activity within older age groups. E.g. players permitted to go to local shops/cafe etc. Players access to friends/family will be facilitated as far as possible during tournaments/after fixtures etc as communicated for specific events. Players aged under 18 must be signed in/out of a camp by a parent/carer if leaving camp at any other time.
- Players must not take images or film other players or staff without their express consent, or when anyone involved is a state of undress. Phones and other electronic devices must not be used in showers/toilet/changing areas or other sensitive areas e.g. medical treatment rooms and hydro recovery. Images and footage taken by players in an England environment must not be placed onto personal social media channels except in agreed situations.
- The use of phones and other technology should be restricted to permitted use at agreed times.

SECTION 6:

TECHNOLOGY, E-SAFETY AND COMMUNICATION



SECTION 6:

TECHNOLOGY, E-SAFETY AND COMMUNICATION

The FA recognises that players will engage with the internet and social media during their time with England. Whilst many of these platforms provide players with ways of keeping in touch with friends and family while in England environments, it is important that all colleagues working with England are aware of the potential risks when using electronic devices and media.

These risks may include (not exhaustive):

- Posting details, photographs and/or imagery which may reveal personal details, their whereabouts and/or the location of an England event.
- Grooming – leading to abuse in the virtual and/or real-world environment.

Grooming – concerns relating to radicalisation involving terrorism and/or extreme ideologies.

- Bullying (online/cyber) and/or trolling - leading to adverse mental health issues.
- Access to inappropriate/illegal content involving self-harm/suicide ideation, violence, substance misuse, pornography, child abuse/adult abuse/animal abuse imagery or material.
- Exploitation and/or coercion into involvement in risky behaviour and/or criminal acts.

Colleagues working with England will be issued with separate guidance relating to Safer Working Practice guidance around use of electronic devices and communication with players.

SECTION 7:

SAFEGUARDING TRAINING & DEVELOPMENT



SECTION 7:

SAFEGUARDING TRAINING & DEVELOPMENT

All FA colleagues are required to complete an introductory Safeguarding module at the start of their employment with The FA. In addition, those working with under-18s are required to complete The FA's Safeguarding Children E-Learning Module.

Furthermore, all colleagues working in direct roles with England Teams will be provided with regular additional safeguarding training and briefings to support with their specific role.





SECTION 8:

SAFEGUARDING CHILDREN



SECTION 8:

SAFEGUARDING CHILDREN

Indications that a child is or may be being abused can be difficult to recognise. Some children may have additional vulnerability, for example, due to their age, disability, mental health, language, culture or sexual orientation, gender identity or care experience. Some signs and indicators may be explained by something plausible, for example, bereavement, sudden absence of a parent/carer, adolescence or accidental injury. The presence of one or more of the signs and indicators outlined in this section should not be taken as proof that abuse has or is taking place, although you do not need evidence to share your concerns. Remember, someone may be at increased risk of harm if you fail to share your concerns.

The definitions, possible signs and indicators detailed in this section are not exhaustive. However, they can assist in identifying abuse and other issues that impact on the safety, welfare and wellbeing of children.



SECTION 8:

SAFEGUARDING CHILDREN (CONTINUED)

8.1 CATEGORIES OF ABUSE AND DEFINITIONS RELATING TO CHILD SAFEGUARDING

Definitions within this section (unless otherwise stated) have been adapted from [Working Together To Safeguard Children \(2023\)](#)

Category of abuse	Examples within a football context
Physical Abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.	• Nature and intensity of training or competition exceeds the capacity of the child's immature growing body. • Coaches encourage the use of drugs or harmful substances to enhance performance or delay puberty. • Players are required to participate when injured. • Punishments used by coaches involve inflicting pain.
	Typical signs and indicators of abuse • Bruises. • Broken or fractured bones. • Burns or scalds. • Unexplained injuries, inconsistent explanations, reluctance to acknowledge or discuss injuries. • Bite marks.
Category of abuse	Examples within a football context
Emotional Abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.	• Children are subjected to repeated criticism, sarcasm, name-calling or racism. • A child is ignored or excluded. • Children feel pressure to perform to unrealistically high expectations. • Children are made to feel like their value or worth is dependent on their sporting success.
	Typical signs and indicators of abuse • Seems unconfident or lack self-assurance. • Struggles to control their emotions. • Has difficulty making or maintaining relationships, acts in a way that's inappropriate for their age.

SECTION 8:

SAFEGUARDING CHILDREN (CONTINUED)

Category of abuse	Examples within a football context
Sexual Abuse is perpetrated by both men and women. Children can also abuse other children (see Child-on-Child Abuse). Sexual Abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse.	- Coaching techniques involving physical contact with children where situations are created where sexual abuse can be disguised. - An abusive situation can also develop if a person in a position of trust, such as a coach, was to misuse their power. - Contacts made within football and pursued through other routes, such as social media, have been used to groom children for abuse. Sexual abusers can also groom protective adults, including parents/carers, and organisations to create opportunities for abuse to take place.
	Typical signs and indicators of abuse - Unhealthy or inappropriate sexual behaviour and language or an understanding of sex that's not appropriate for their age. - Being frightened of some people, places or situations. - Being secretive about how they're spending their time, including when online. - Sharp changes in mood or character e.g. being upset, withdrawn or distressed. - Having money or new things like clothes, trainers, mobile phones that they can't or won't explain. - Alcohol or drug misuse/underage drinking or drug-taking. - Sexually-transmitted infections. - Unexplained pregnancy or where the child is under 16. - Having an older boyfriend or girlfriend. - Spending more or less time online/on their devices. - Spending more time away from home or going missing for periods of time.
Category of abuse	Examples within a football context
The term 'grooming' is commonly used to describe the process of entrapping and preparing a child, the adults around them and even the environment to enable abuse to take place. Grooming is a core part of many cases of sexual abuse but children and young people can also be groomed for radicalisation or criminal exploitation. Children and young people can be groomed online, in person or both – by a stranger or someone they know – such as a family member, friend or professional. CPSU https://thecpsu.org.uk/resource-library/best-practice/protecting-children-in-sport-from-grooming-and-sexual-abuse/	Example behaviours relating to perpetrators: - Showing particular interest in individuals, showing favouritism or undue criticism. - Regular and unnecessary contact with the child's family. - Persistently not following guidance around acceptable behaviours and safer working practice.
	Typical signs and indicators of abuse - Very secretive about how they're spending their time, including when online. - Spending more time online or on their devices. - Sexualised behaviour and language use that is not appropriate to use in child or professional environments. For signs and indicators of sexual abuse in children please see the 'sexual abuse' section above.

SECTION 8:

SAFEGUARDING CHILDREN (CONTINUED)

Category of abuse	Examples within a football context
Child Sexual Exploitation (CSE) is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur online.	• Children spending excessive time in and around football environments outside of training and match days with no clear purpose. • Children being dropped off or collected by older friends.
	Typical signs and indicators of abuse • Having an older boyfriend or girlfriend. • Staying out late or overnight. • Having a new group of friends. • Missing from home, or attending sessions and/or education. • Hanging out with older people, other vulnerable people or in antisocial groups. • Involved in a gang. • Involved in criminal activities like selling drugs or shoplifting.

SECTION 8:

SAFEGUARDING CHILDREN (CONTINUED)

Category of abuse	Examples within a football context
Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: • Provide adequate food, clothing and shelter (including exclusion from home or abandonment). • Protect a child from physical and emotional harm or danger. • Ensure adequate supervision (including the use of inadequate caregivers).	A coach or supervisor repeatedly: • Failing to ensure children are safe. • Exposing children to undue cold, heat or extreme weather conditions without ensuring adequate clothing or hydration. • Exposing children to unnecessary risk of injury by ignoring safe-practice guidelines. • Failing to ensure the use of safety equipment. • Requiring young people to participate when injured or unwell.
	Typical signs and indicators of abuse Poor appearance and hygiene: • Being smelly or dirty, hungry or not given money for food; • Having unwashed kit/clothes or inappropriate clothing, such as no warm kit/clothes in winter. Health and development problems: • Poor language or social skills; • Regular illness or infections; • Skin issues, such as sores, rashes, flea bites, scabies or ringworm; • Thin or swollen tummy; • Tiredness; • Untreated injuries; • Weight or growth issues. Housing and family issues: • Living in an unsuitable home environment e.g. having no heating. • Taking on the role of carer for other family members. Change in behaviour: • Becoming clingy; • Becoming aggressive; • Being withdrawn, depressed or anxious; • Changes in eating habits; • Displaying obsessive behaviour; • Finding it hard to concentrate or take part in activities; • Showing signs of self-harm; • Using drugs or alcohol.

SECTION 8:

SAFEGUARDING CHILDREN (CONTINUED)

Category of abuse	Examples within a football context
Bullying is the use of aggression with the intention of hurting another person this may be by an adult towards a child or child-on-child abuse. Bullying results in pain and distress to the victim. Bullying can be: - Emotional being unfriendly, excluding (emotionally and physically) sending hurtful text messages, tormenting, (e.g. hiding football boots/shinguards, threatening gestures). - Physical pushing, kicking, hitting, punching or any use of violence. - Sexual unwanted physical contact or sexually abusive comments. - Discriminatory comments, jokes about or targeted abuse aimed towards disabled children, homophobic, transphobic, sexist, gendered, racist or faith-based comments. - Verbal name-calling, sarcasm, spreading rumours, teasing.	Bullying can occur based on a young person's football or sporting ability, body size or shape. It might include name-calling, offensive hand gestures, physical assault or exclusion from team activities. Offensive comments being made across social media platforms and private messaging.
	Typical signs and indicators of abuse
	- Being afraid to go to places. - Change in performance and not achieving their usual standards. - Giving their possessions or money to whoever's bullying them. - Being nervous, losing confidence, or becoming distressed and withdrawn. - Problems with eating or sleeping. - Bullying others.
Category of abuse	Examples within a football context
Cyber-bullying is when a person uses technology i.e. mobile phones or the internet (social networking sites, chat rooms, instant messenger, tweets), to deliberately upset someone. This could take the form of posting derogatory abusive comments, videos or images on social media. Bullies often feel anonymous and 'distanced' from the incident when it takes place online and 'bystanders' can easily become bullies themselves by forwarding the information on.	Offensive comments being made across social media platforms and private/group messaging.
	Typical signs and indicators of abuse
	- Spending more time online or on their devices. - Change in performance and not achieving their usual standards. - Being nervous, losing confidence, or becoming distressed and withdrawn.

SECTION 8:

SAFEGUARDING CHILDREN (CONTINUED)

Category of abuse	Examples within a football context
Hazing is a specific type of bullying. It refers to any activity expected of someone joining/re-joining a group that humiliates, degrades, abuses, or endangers them, regardless of that person's willingness to participate.	Banter: All people's life experiences; beliefs and circumstances are different. Because of these differences something that one person sees as 'banter' may cause harm or offence to another. Initiation Ceremonies: May be in person or online
	Typical signs and indicators of abuse Hazing can have a negative psychological impact. The impact can be long lasting depending on the player, the activity, and the environment. Psychological effects of hazing may include: • Depression. • Low self-esteem. • Decrease in confidence. • Mental illness. The effects of hazing may result in players feeling they can no longer relate to their teammates, or feeling they need to stop playing altogether. Their work or school and family life may also be negatively impacted as a result.
Category of abuse	Examples within a football context
Extremism goes beyond terrorism and includes people who target the vulnerable – including the young – by seeking to sow division between communities on the basis of race, faith or denomination. It includes: • Justifying discrimination towards women and girls. • Persuading others that minorities are inferior. • Arguing against the primacy of democracy and the rule of law in our society. Extremism is defined in the Prevent strategy as the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces.	• Talking excessively about injustice. • Showing sympathy for extremist causes, glorifying and advocating violence. • Signs and symbols linked to proscribed groups.
	Typical signs and indicators of abuse • Scripted speech. • Possessing and/or distributing illegal literature, out of character changes in behaviour, dress and peers, isolating selves from family/friends. • Disrespectful attitude towards people who are different to them, inability to discuss views or unable to explain opinions, change in Ideology, secretive over internet use or movements.

SECTION 8:

SAFEGUARDING CHILDREN (CONTINUED)

Category of abuse	Typical signs and indicators of abuse
County Lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of 'deal line'. They are likely to exploit children (disabled children are particularly vulnerable) to move and store the drugs and money, and they will often use coercion, intimidation, violence (including sexual violence) and weapons.	• Change in behaviour. • Signs of assault and/or malnutrition. • Access to numerous phones. • Use of unusual terms e.g. going country. • Associating with gangs. • Unexplained bus or train tickets. • School truancy or going missing. Unexplained gifts (clothes, trainers) and cash.
Child Criminal Exploitation (as set out in the Serious Violence Strategy, published by the Home Office), is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity: • In exchange for something the victim needs or wants, and/or • For the financial or other advantage of the perpetrator or facilitator, and/or • Through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology.	• Frequently absent from activities and education provision. • Going missing from home, staying out late and travelling for unexplained reasons. • In a relationship or hanging out with someone older than them. • Being angry, aggressive or violent. • Being isolated or withdrawn. • Having unexplained money and buying new things. • Wearing clothes or accessories in gang colours or getting tattoos. • Using new slang words. • Self-harming and feeling emotionally unwell. • Taking drugs and abusing alcohol. • Committing petty crimes like shop lifting or vandalism. • Unexplained injuries and refusing to seek medical help. • Carrying weapons. • Spending more time on social media and being secretive about time online. • Making more calls or sending more texts, possibly on a new phone or phones.

SECTION 8:

SAFEGUARDING CHILDREN (CONTINUED)

Category of abuse	Typical signs and indicators of abuse
Children can abuse other children. This is often referred to as Child-on-Child Abuse. This is most likely to include, but may not be limited to: • Bullying (including cyberbullying, prejudice-based and discriminatory bullying). • Abuse in intimate personal relationships between children (also known as teenage relationship abuse). • Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm. • Sexual violence and sexual harassment. • Consensual and non-consensual sharing of nude and semi-nude images and/or videos. (also known as sexting or youth produced sexual imagery). • Upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and. • Initiation/hazing type violence and rituals. (adapted from Keeping Children Safe In Education 2024)	Please see bullying and cyber-bullying section. It is important to remember that children can be both perpetrators and victims in this abuse. The behaviour is harmful to children perpetrating the abuse as well as those who are victims of the abuse.

SECTION 8:

SAFEGUARDING CHILDREN (CONTINUED)

Category of abuse	Typical signs and indicators of abuse
So-called 'Honour' - Based Abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA. FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Adapted from Keeping Children Safe in Education 2024	Signs FGM might happen: • A relative or someone known as a 'cutter' visiting from abroad. • A special occasion or ceremony takes place where a girl 'becomes a woman' or is 'prepared for marriage'. • A female relative, like a mother, sister or aunt has undergone FGM. • A family arranges a long holiday overseas or visits a family abroad during the summer holidays. • A girl has an unexpected or long absence from activities or school. Signs FGM might have taken place: • Having difficulty walking, standing or sitting. • Spending longer in the bathroom or toilet. • Appearing quiet, anxious or depressed. • Acting differently after an absence from school or college. • Reluctance to go to the doctors or have routine medical examinations. HBV: • Withdrawal from education or activities experiencing violence or threats of violence, coercion, physical, sexual or emotional abuse, intimidation. • Unreasonable restrictions of freedom, monitored by family or wider community. • Hiding mobile phones or social media, secret friends or relationships. • Limited aspirations, self-harm. • Requests for extended leave, failing to return from visits abroad.

Category of abuse	Typical signs and indicators of abuse
Forced Marriage involves forcing someone into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause someone to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where no consent is given consent or where consent cannot be given (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage.	• Excessive parental restriction and control of movements, including unreasonable restrictions such as being kept at home by their parents ('house arrest') or being unable to complete their education. • History of siblings leaving education early to marry. • A child talking about an upcoming family holiday that they are worried about. • Fears that they will be taken out of activities and education to stay abroad. • Evidence of self-harm, treatment for depression, attempted suicide, social isolation, eating disorders or substance abuse. • Always being accompanied when away from home.

SECTION 8:

SAFEGUARDING CHILDREN (CONTINUED)

Category of abuse	Typical signs and indicators of abuse
Domestic Abuse may be a single incident or a course of conduct which can encompass a wide range of abusive behaviours, including a) physical or sexual abuse; b) violent or threatening behaviour; c) controlling or coercive behaviour; d) economic abuse; and e) psychological, emotional, or other abuse. All children can experience and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members, including where those being abusive do not live with the child. Experiencing domestic abuse can have a significant impact on children. Section 3 of the Domestic Abuse Act 2021 recognises the impact of domestic abuse on children (0 to 18), as victims in their own right, if they see, hear or experience the effects of abuse. Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as teenage relationship abuse.	• Aggression or bullying. • Anti-social behaviour, like vandalism. • Anxiety, depression or suicidal thoughts. • Attention-seeking. • Bed-wetting, nightmares or insomnia. • Constant or regular sickness, like colds, headaches and mouth ulcers. • Drug or alcohol use. • Eating disorders. • Tantrums. • Withdrawal. • Problems in school and/or challenges with learning.

Category of abuse	Typical signs and indicators of abuse
Low-level concerns are concerns arising from behaviours or actions which could be described as poor practice. These behaviours fall below the standard required by The FA as set out in expectations of acceptable behaviours and conduct. While the behaviour may not be immediately dangerous or intentionally harmful it does set a poor example and if it were to continue, it might lead to harm or put a child in danger.	• Spending excessive time alone with children. • Not adhering to guidance when transporting children including travel abroad. • Failure to provide effective supervision for coaching sessions which should be properly planned. • Putting performance over the well-being and safety of players. • Having favourites and not treating all children fairly and equitably. • Allowing rough and dangerous play, bullying, the use of bad language or inappropriate behaviour by players. • Overtraining and exerting undue influence over players. • Using punishments that humiliate or harm children. • Providing one to one coaching without any supervision or the presence of other adults. • Inappropriate use of social media. • Allowing children to discriminate on the grounds of religion, race, gender, social class or lack of ability. • Engaging in, or tolerating, offensive, insulting or abusive language or behaviour. • Failure to challenge poor practice/low-level concerns by others. • Allowing allegations of abuse to go unchallenged or unrecorded and failing to report these.

SECTION 8:

SAFEGUARDING CHILDREN (CONTINUED)

8.2 KEY PRINCIPLES RELATING TO SAFEGUARDING CHILDREN:

- The welfare of the child is paramount (Children Act 1989).
- **It is the responsibility of all colleagues to safeguard** and promote the welfare of children.
- The FA is committed to working in partnership with local and national statutory partners, including the Police, Children's Social Care, Local Safeguarding Children Partners, and the Disclosure and Barring Service (DBS) in accordance with their procedures.
- Multi-agency working is essential to enable partner organisations to carry out their statutory duties to investigate concerns and protect all children.

Our colleagues working with England:

- Are responsible for their own decisions, actions and behaviour and should avoid any conduct which could lead to questions regarding motivation and intentions.
- Should work and be seen to work, in an open and transparent way.
- Should be consistent with decision-making and player centred and in work in accordance with principles outlined within The FA's policies and procedures in relation to inclusion, equity and equality.
- Should embrace a continuous improvement approach, encouraging and assessing feedback and ways to improve practice in line with this policy and safer working practice guidelines.

8.3 CONTEXTUAL SAFEGUARDING AND ADDITIONAL VULNERABILITY

Contextual Safeguarding is an approach to understanding and responding to children's experiences of abuse beyond their families.

Traditional approaches to protecting children from harm have focused on the risk of violence and abuse from inside the home, usually from a parent/carer or other trusted adult. They don't always address the places and spaces where children spend time outside the home and the influence of others (including friends, peers and adults) that may impact upon the development and safety of children.

Contextual Safeguarding looks at how interventions can change processes and environments, to make them safer for all children, as opposed to focusing on an individual.

When considering children involved with England, there are a range of factors which may influence or impact upon the child's safety or well-being, within and away from the England environment. These may include a child's:

- Status as an elite athlete and club and/or National Teams environment – and the consequent pressure to perform consistently at a high level and with professional and public scrutiny.
- Home circumstances and environment, including whether the child is living away from their parents/carers (e.g., with a host family) and/or are a 'looked after child' under the care of a local authority or live independently and/or where their parent club is based abroad.

SECTION 8:

SAFEGUARDING CHILDREN (CONTINUED)

- Peers (including concerns relating to child-on-child abuse and bullying)– within and away from football.
- Public pressure – including through traditional media and social media.
- Education provision – including access to support while on England duty.
- Football and accommodation environments including Club Facilities and FA Venues (e.g., St. George's Park, Wembley Stadium and third-party provided facilities hired by or on behalf of The FA etc.

When considering any child safeguarding concerns, The FA will consider the information and issues available in its broadest sense, including;

- How the child can be effectively supported within the England environment.
- How The FA can work in partnership with parents/carers, statutory agencies, education providers, our venues and where appropriate, other relevant organisations in pursuit of positive outcomes for the child within their environments and contexts.
- How implementing additional support or safeguards across the team environment could support the child.

Additional Vulnerability

We recognise that some children are disadvantaged by their experiences. This could be as a result of family circumstances, poverty, discrimination, disability, mental health, domestic violence, child abuse, or substance and alcohol misuse.

The more challenges facing a child, the greater their vulnerability to abusive behaviour, grooming, exploitation and/or radicalisation. Additionally, it is known that the COVID-19 pandemic has increased

children's vulnerability to abuse and exploitation, as a result of the impact upon themselves, their peers and their parents and carers.

The Equality Act (2010) defines Protected Characteristics. All colleagues working with England must have awareness of this. When developing delivery plans and implementing any relevant safeguards, children's individual needs and requirements must be afforded significant consideration and that reasonable adjustments are put in place to support their inclusion and well-being.

8.4 MANAGING CHALLENGING BEHAVIOUR (UNDER-18S)

Children involved with England enter these environments with a diverse range of needs and behaviours, all of which may be influenced by their own individual experiences, involvement in the events itself, including the environment and others around them. As a result, children from time to time may display challenging behaviour.

Challenging behaviour has been defined as behaviour that is 'of such an intensity, frequency, or duration as to threaten the quality of life and/or the physical safety of the individual or others and it is likely to lead to responses that are restrictive, aversive or result in exclusion'.

Colleagues working directly with children involved with England events and activities must consider if any child needs, or may need, additional support or supervision to participate safely, as a result of their behaviour. Such factors should be risk-assessed and included within Safeguarding Risk Assessments. Additionally, colleagues should be mindful that behaviour which presents as challenging may also be as a result of a disability or poor mental health. If colleagues are unsure how to approach a particular issue, they should seek advice from a member of the Safeguarding Team and/or Performance Lifestyle and Education Team.

SECTION 8:

SAFEGUARDING CHILDREN (CONTINUED)

Colleagues should encourage a positive approach to behaviour with clear expectations and boundaries, including acceptable and unacceptable behaviour which must be addressed through team codes of conduct. With the support of colleagues, players will be encouraged to further develop and take ownership of their own code of conduct in an England environment.

8.5 BULLYING AND HAZING

The FA takes reports of bullying and hazing very seriously. All concerns arising within an England environment must be raised to the Event/Camp Designated Safeguarding & Welfare Lead who will determine the most appropriate in-event response (taking advice from the Safeguarding Team where required). Each team/age group must have appropriate systems in place to handle reports of bullying and with appropriate sanctions where required, which may include removing the player from the event environment.

Concerns relating to bullying and/or hazing which arise away from an event environment must be raised with the Safeguarding Team.

8.6 CHILD ON CHILD ABUSE

The FA recognises that children may display behaviour which goes beyond bullying, including abusive behaviour towards other children. Colleagues should be vigilant to these issues and concerns relating to child-on-child abuse, which must be reported to the Safeguarding Team and will be referred to the FA Safeguarding Case Management Team/statutory agencies as required.



SECTION 8:

SAFEGUARDING CHILDREN (CONTINUED)

8.7 EXTREMISM AND RADICALISATION

Concerns relating to **Extremism** go beyond terrorism and include people who target the vulnerable – including children – by seeking:

- To sow division between communities on the basis of race, faith or denomination.
- Justify discrimination towards women and girls.
- Persuade others that certain groups are inferior; or
- Argue against the primacy of democracy and the rule of law in our society.

Radicalisation is the process by which someone comes to support terrorism and forms of extremism and may lead to terrorism. Anybody from any background can become radicalised. The behaviours and processes of radicalisation share similarities with other forms of exploitation and grooming. It is therefore a safeguarding issue of which football should make itself aware and that we must consider when implementing safeguards with England.

8.8 LEGISLATION AND STATUTORY GUIDANCE FRAMEWORK

This approach to Safeguarding Children is based on legislation, statutory and best practice guidance, including:

- [The Children Act 1989, 2004](#)
- [Children and Families Act 2014](#)
- [Children and Social Work Act 2017](#)
- [Counter terrorism and Security Act 2015](#)
- [Data Protection Act 2018 and UK General Data Protection Regulation \(GDPR\)](#)
- [Disclosure and Barring Service Guidance](#)
- [Equality Act 2010](#)
- [Human Rights Act 1998](#)
- [Keeping Children Safe in Education 2024](#)
- [Mental Capacity Act 2005](#)
- [Protection of Freedoms Act 2012](#)
- [Sexual Offences Act 2003](#)
- [Safeguarding Vulnerable Groups Act 2006](#)
- [UN Convention on Rights of the Child \(UNCRC\) 1989](#)
- [Working Together to Safeguarding Children 2023](#)



SECTION 9:

SAFEGUARDING ADULTS

SECTION 9:

SAFEGUARDING ADULTS

England Women's National under-19s, under-23s and Senior Teams are environments which will predominantly involve adult players, and from time to time some under-18 players.

The FA has a duty of care towards all players within these teams, ensuring measures are in place to protect these players from harm and abuse, as well as supporting their well-being.

9.1 ADULTS AT RISK

The Care Act (2014) defines the principle, that an adult may be deemed an 'adult at risk' when they;

- Have need for care and support (whether or not the care and support is being provided) and:
- Is experiencing, or at risk of abuse or neglect, and:
- As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of, abuse or neglect.

This definition means that:

- It is a situation that can change – someone who is an adult at risk may not have always been or may continue to be.
- Having a disability does not automatically mean someone is an 'adult at risk'.

Whether or not an adult is deemed an adult at risk may not be immediately apparent or known. Where you have cause for concern, you must act on those concerns and seek advice from the Safeguarding Team. Where the concern relates to someone with a role within football, a referral must be made to the Safeguarding Case Management Team, in accordance with The FA's Safeguarding Regulatory Framework regarding Adults at Risk.

SECTION 9:

SAFEGUARDING ADULTS (CONTINUED)

9.2 CATEGORIES OF ABUSE AND DEFINITIONS RELATING TO ADULT ABUSE

The definitions, possible signs and indicators detailed in this section are not exhaustive. However, they can assist in identifying abuse and other issues that impact on the safety, welfare and well-being of adults. The Care Act recognises 10 types of abuse that may be experienced by adults (The FA also recognises bullying as a form of abuse for children and adults).

Type of Abuse	In football we might see...
Physical abuse – includes hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions. This might happen in football or elsewhere.	Regular over-training, refusing breaks or intentionally hitting or kicking a player or punishing a player. We might also see bruising to arms or face, repeated injuries, fearfulness or anxiety. A change in the behaviour or confidence of a person. This may be a sign of any type of abuse.
Sexual abuse – adults with care and support needs can consent to sexual activity but can still be abused. This includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure.	A coach or manager demands sexually-explicit pictures from an adult with learning disabilities whom they are training. A player may comment on behaviours they don't like from other adults or young people. Their behaviour may become disturbed or overly sexual. Adults can be sexually exploited as well as children.
Emotional or psychological abuse – this could include threats of harm or abandonment, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.	Threatening a player with physical harm or persistently blaming them for poor performance or sending harassing messages after a game. Players should report that this is happening to them. A parent/carer always speaks for the person and doesn't allow them to make their own choices. Person is not attending/no longer enjoying their sessions. You may notice that a participant in a team has been missing from practice sessions and is not responding to reminders from team members or coaches.
Domestic abuse including coercive control – including psychological, physical, sexual, financial and emotional abuse. It also includes so called 'honour'-based violence. This happens away from football but we might see signs in football.	A person who is withdrawn, fearful or anxious when a carer or partner or family member comes to collect them, bruising, grip marks or other signs of stress or physical harm.

SECTION 9:

SAFEGUARDING ADULTS (CONTINUED)

Financial or material abuse – including theft, fraud, internet scamming or coercion in relation to an adult’s financial affairs or arrangements.	A colleague demanding a player buys them a ticket for a game or insisting they buy everyone rounds of drinks and takeaways they can’t afford and don’t want. A player might not be able to afford match fees/subs or new kit, appears to be hungry or reports being unable to pay rent.
Type of Abuse	In football we might see...
Neglect – including ignoring medical or physical care needs, failure to provide access to appropriate health social care or educational services, the withholding of medication and lack of food or heating.	A player whose medical conditions are untreated or who needs glasses or hearing aids, who is always hungry or complains that their home is always cold or they can’t have a shower at home after football.
Organisational abuse (sometimes called Institutional abuse) – includes neglect and/or poor practice within an organisation such as care homes or health settings, but also includes sport organisations such as those within football.	A closed or unsafe culture, perpetuated by lack of or ineffective policies and procedures or structures in the organisation An organisation persistently fails to meet players’ needs. For example, allowing players to be injured or ill due to lack of care. A player from sheltered accommodation may report rigid rules and lack of choices in their home – for example, having to go to bed at a certain time.
Discriminatory abuse – difference or perceived difference, particularly with respect to race, gender or disability or any of the other protected characteristics of the Equality Act. This might happen in football.	Behaviours such as harassing a colleague because they are – or are perceived to be – transgender, or jokes about a player’s disability or use of discriminatory language, on- or offline. A player might report this happening to them elsewhere.
Self-neglect – not looking after own personal hygiene, health or surroundings. This includes behaviours such as hoarding. This happens away from football, but we might see signs in football.	Players or others may be hungry, dressed in old clothes and lacking in money despite being in work. Poor personal hygiene, need for dental care or glasses. Dirty playing kit.

SECTION 9:

SAFEGUARDING ADULTS (CONTINUED)

Modern slavery – slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

Players or others may be hungry, dressed in old clothes and lacking in money despite being in work.

In football we might also see:

Bullying – bullying is the repetitive, intentional hurting of one person or group by another person or group, where the relationship involves an imbalance of power. It can happen face-to-face or through cyberspace and comes in many different forms.

Cyber-bullying – using technology to bully and humiliate people.

Hazing – is a specific type of bullying. It refers to any activity expected of someone joining/re-joining a group that humiliates, degrades, abuses, or endangers them, regardless of that person's willingness to participate.

Peer-to-peer Abuse – where adults behaviour to another adult is a cause for concern e.g. players behaviour towards another player.

Forced marriage – The Anti-social Behaviour, Crime and Policing Act 2014 makes it a criminal offence to force someone to marry. The adult may report gifts of gold, planned trips abroad or disclose anxiety about an event.

Mate crime – when vulnerable people are befriended by members of the community who go on to exploit and take advantage of them. It may not be an illegal act, but still has a negative effect on the individual.

Radicalisation – the aim of radicalisation is to attract people to their reasoning, inspire new recruits and embed their extreme views and persuade vulnerable individuals of the legitimacy of their cause. This may be direct through a relationship, or through social media.

Forced Home Invasion (also known as Home Takeover or Cuckooing) – when criminal gangs use violence and abuse to target the homes of people who are vulnerable, to use them as a base for crime, often drug dealing. This is a form of exploitation.

The above is not an exhaustive list. There are many signs and indicators that may suggest someone is being abused or neglected. There may be other explanations, but they should not be ignored.

SECTION 9:

SAFEGUARDING ADULTS (CONTINUED)

9.3 KEY PRINCIPLES IN RELATION TO SAFEGUARDING ADULTS

The Care Act 2014 sets out the following principles that should underpin the safeguarding of adults and should be considered in any safeguarding action:	
Mental capacity	Capacity refers to an individual adult's ability to take a specific decision or take a particular action at a particular time even if they are able or not able to make other decisions at other times. The starting point should be the assumption that the person has capacity to make a decision unless it can be established that they cannot.
Empowerment	People are supported and encouraged to make their own decisions and informed consent.
Prevention	It is better to take action before harm occurs.
Proportionality	The least intrusive response appropriate to the risk presented.
Protection	Support and representation for those in greatest need.
Partnership	Services offer local solutions through working closely with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
Accountability	Accountability and transparency in delivering safeguarding: Person-centred safeguarding means ensuring the person is fully involved in conversations about their situationThe adult's views, wishes feelings and beliefs must be respected when decisions are being made about how to support them to be safe. There may be different ways to minimise risk or prevent further harm. Person-centred safeguarding means supporting the individual to exercise choice and control to find solutions that are right for them and that improve their welfare. A useful phrase to remember here is 'nothing about me, without me'.

SECTION 9:

SAFEGUARDING ADULTS (CONTINUED)

9.4 MISCONDUCT CONCERNS IN RELATION TO ADULT PLAYERS

Concerns relating to the behaviour of an adult towards another adult in a football environment (whether at a club or in an England setting) may be a misconduct matter. This means concerns about the behaviour of an adult towards another adult in football. For example, this could be peer-to-peer or a colleague towards a player. It includes discriminatory behaviour or language, bullying and sexual misconduct, violent conduct, serious foul play, threatening, abusive, indecent or insulting words or behaviour.

Concerns relating to misconduct concern within an England environment can be raised to:

- England – the FA Safeguarding Team.
- The FA – The team who investigate misconduct are The FA Integrity Team via integrity@TheFA.com
- Police – for any suspicions of, or criminal behaviour via 101 (non-emergency) or 999 in an emergency.

9.5 LEGISLATION AND STATUTORY GUIDANCE FRAMEWORK

This approach to Safeguarding Adults is based on legislation, statutory and best practice guidance, including:

[Care Act 2014](#)

[Care and Support Statutory Guidance \(updated 2024\)](#)

[Counter Terrorism and Security Act 2015](#)

[Data Protection Act 2018 and UK General Data Protection Regulation \(GDPR\)](#)

[Disclosure and Barring Service guidance](#)

[Equality Act 2010](#)

[Human Rights Act 1998](#)

[Mental Capacity Act 2005](#)

[Protection of Freedoms Act 2012](#)

[Sexual Offences Act 2003](#)

[Safeguarding Vulnerable Groups Act 2006](#)



SECTION 10:

RESPONDING TO CONCERNS

SECTION 10:

RESPONDING TO CONCERNS

Safeguarding concerns may occur in numerous ways, including:

1. You witness a safeguarding incident.
2. A child or adult tells you something directly.
3. A colleague or partner organisation passes on information.
4. A report is made about abuse or behaviour that gives cause for concern, poor practice or breach of the code of conduct or appropriate behaviours guidelines.
5. Where there is one or more low-level concern about someone working with England.

Apart from direct reporting, concerns can be expressed:

- Via past or present players, parents/carers, colleagues, volunteers, contractors, associates, consultants etc.
- Via social media.
- Anonymously via text, letters, emails or telephone calls.

However a concern arises, whether the concern is happening now or is non-recent, occurs at an event, or you learn about an issue happening away from an England environment, it is essential that all colleagues working with England follow the guidance and processes below.

Remember – IT IS NOT the responsibility of colleagues or volunteers to decide if abuse has taken place, but it is your responsibility to act on any concerns.

Here's some helpful guidance for handling concerns while working on an England event or which arise away from this environment.

RECOGNISE

RESPOND

REPORT

RECORD

REVIEW

SECTION 10:

RESPONDING TO CONCERNS (CONTINUED)

10.1 Steps to take if you are told of – or witness – a safeguarding concern at an England event

RECOGNISE	A person discloses concerning information to you or you have witnessed or had reported to you: • An incident or complaint involving the behaviour of an adult (or other child) in relation to a child or adult. This could be considered either abuse, misconduct or as a low-level concern. • A safeguarding concern related to an adult or child where the concern is about their welfare or well-being, or where the concern arises from the adult's or child's life away from football e.g. home, school etc.
RESPOND	• Stay calm, listen carefully and offer reassurance, do not promise to keep the information confidential. Then follow the reporting protocol below. • If the victim is in need of urgent medical treatment, contact the medical team or emergency services immediately – and tell them it's a potential safeguarding issue. • If the person is in immediate danger, contact the Police on 999.
REPORT	(Note: If your concern relates to one of the roles involved in the reporting process do not raise your concern with them – escalate to the next most senior colleague on duty for that event, the Safeguarding Team, Safeguarding Case Management Team or contact the NSPCC) • In the first instance – raise your concern with the Event Designated Safeguarding & Welfare Lead for the event. This should be done immediately. • They will consider the most appropriate response to ensure the safety of the person in the environment. This may include convening a 'Event/Camp Welfare Group' (see below) to support with an appropriate response including relevant sharing of information. • All safeguarding concerns, including those that come from any other third-party provider, must be reported within 24 hours in person or via telephone to the Event Safeguarding Duty Line. This is monitored by members of the Safeguarding Team during England Events. • Serious issues must be reported to the Event Safeguarding Duty Line as soon as possible and will be followed up by the relevant member of the Safeguarding Team as appropriate, who will further advise on the handling of the concern, including any onward referral to The FA Safeguarding Case Management and/or The FA Integrity Team and/or statutory agency. Details of all internal contact numbers should be located within the specific Event Safeguarding Plan for each England Event and are also accessible via The FA's intranet.
RECORD	All safeguarding incidents, concerns and referrals must be recorded either by FA referral form or via The FA's Electronic Case Recording System within 24 hours. In an England Event environment, this will be led by the named Event Designated Safeguarding & Welfare Lead or Safeguarding Team. The Safeguarding Team will advise on next steps and support onward referral to the FA Safeguarding Case Management Team/statutory agency etc.
REVIEW	Discuss with the Safeguarding Team the most appropriate way to review any reported issue on a case-by-case basis, including who will lead on any review.

SECTION 10:

RESPONDING TO CONCERNS (CONTINUED)

CONVENING AN EVENT WELFARE GROUP (EWG)

The Event Designated Safeguarding & Welfare Lead should lead on any in-event response to reported safeguarding concerns or incidents. It should be recognised that depending on the specific context of the concerns raised, a multi-disciplinary approach is required to ensure a co-ordinated in-event response. This includes sharing information with relevant FA colleagues. As such, a co-ordinated group from staff team working at/on an event may be convened to support and address concerns on an event. Advice on convening an EWG during an event can be requested from the Safeguarding Team.

Membership of the EWG would need to reflect the situation and context of the concerns and may include (but is not limited to):

- Event Designated Safeguarding & Welfare Lead.
- Medics (Doctor/Physio/Psychologist as appropriate).
- Player Education & Lifestyle Officer (where appropriate).

SECTION 10:

RESPONDING TO CONCERNS (CONTINUED)

10.2 Steps to take if you become aware of a safeguarding concern – away from an event

RECOGNISE	A person discloses concerning information to you or you have witnessed or had reported to you, whilst you are not working on an England event: • An incident or complaint involving the behaviour of an adult (or other child) in relation to a child or adult. This could be considered either abuse, misconduct or as a low-level concern. • A safeguarding concern related to an adult or child where the concern is about their welfare or well-being, or where the concern arises from the adult's or child's life away from football e.g. home, school etc.
RESPOND	• Stay calm, listen carefully and offer reassurance, do not promise to keep the information confidential. Then follow the reporting protocol below. • If the victim is in need of urgent medical treatment, contact the medical team or emergency services immediately – and tell them it's a potential safeguarding issue. • If the person is in immediate danger, contact the Police on 999.
REPORT	(Note: If your concern relates to one of the roles involved in the reporting process do not raise your concern with them – escalate to the next most senior member of staff) • All safeguarding concerns, including those that come from any other third-party provider, must be reported within 24hrs in person or via telephone to either the: • Safeguarding Team or • in their absence via email to Safeguarding@TheFA.com Details of all internal contact numbers can be located via The FA's intranet.
RECORD	The Safeguarding Team will advise on key actions to be taken. Where applicable, all concerns relating to matters away from The FA, will be referred and applied using local procedures and protocols. E.g., referral to Multi-Agency Safeguarding Hubs (MASH) teams and Local Safeguarding Partnership Boards. Where applicable, the Safeguarding Team will advise on next steps and support onward referral to the FA Safeguarding Case Management and/or FA Integrity Teams/FA HR/ statutory agency etc. Note: If any person implicated in a concern holds any of the above-named roles, they should not be included within the reporting protocol.
REVIEW	Discuss with the Safeguarding Team the most appropriate way to review any reported issue on a case-by-case basis, including who will lead on any review.

SECTION 10:

RESPONDING TO CONCERNS (CONTINUED)

10.3 Steps to take if an allegation or concern is raised about an FA colleague or employee of a partner organisation

The person to whom the complaint, concern or incident is reported to must **immediately**:

Contact:

- Safeguarding Case Management Team Safeguarding@TheFA.com
- Senior member of The FA HR Team and Senior Safeguarding Manager or contact The FA Head of Safeguarding directly.

If the above are unavailable, you should contact your supervisor or line manager. Even if outside office hours or at a weekend you should contact one of the above or relevant Senior Management Team member for the specific England pathway.

Regardless of who receives the initial report or complaint, the Senior Safeguarding Manager must be informed immediately. They will advise on next steps and will work closely with the Safeguarding Case Management Team and HR to manage the situation appropriately. This will include recording factual details of the allegation(s) and completing a record, as appropriate, prior to onward referral to the Safeguarding Case Management Team. Where required, the Police and Local Authority Designated Officer (LADO) will be informed.

Any relevant follow-up investigations, disciplinary incidents or actions will be carried out in accordance with FA Group policies and procedures.

Colleagues will be expected to assist and fully co-operate with any investigation.

The safety and well-being of the victim (child and/or adult) should always be at the centre of any investigation.

10.4. Whistleblowing

Whistleblowing can be used as an early-warning system or when it is recognised that appropriate actions have not been taken.

It is a way of revealing and raising concerns over misconduct or malpractice within an organisation, or within an independent structure associated with it, including where there is a worry that a reported safeguarding concern has not been handled appropriately.

Any colleague, child, or parent/carer who has a concern about another FA colleague or player can use whistleblowing by contacting The FA's Safeguarding Team via Safeguarding@TheFA.com or a member of The FA's Senior Management Team.

The UEFA Integrity Platform (used during tournaments) also allows for concerns to be raised (including anonymous reporting). Written complaints can also be sent to childsafeguarding@uefa.ch. Alternatively, a person of trust within UEFA can be spoken to directly to report a concern.

You can also go directly to:

- The Police or Childrens or Adults Social Care.
- The NSPCC general helpline **0808 800 5000**.
- The NSPCC Whistleblowing Advice Line offers free advice and support to professionals with concerns about how child protection issues are being handled in their own or another organisation.

Email - help@nspcc.org.uk or via **0800 028 0285**

SECTION 10:

RESPONDING TO CONCERNS (CONTINUED)

10.5 SAFEGUARDING COMPLAINTS

A safeguarding complaint regarding England may relate to:

- The handling of a low-level concern or welfare concern in relation to England.
- The safeguarding process undertaken by The FA's Safeguarding Case Management Team in relation to a referral or their management of a case.
- Possible abuse or poor practice related to a third-party organisation (including a club etc.).
- Possible abuse or poor practice which requires action by The FA (e.g. regulatory action, external referral etc.).

Where the safeguarding complaint relates to a third party, the complaint should, in the first instance, be directed to that organisation in accordance with their complaint's procedure.

Safeguarding complaints made, and directly related to The FA, will be responded to by the relevant FA department/division as appropriate.

Where a complaint raises a safeguarding concern to The FA in relation to possible abuse or abuse or poor practice, the concern will be handled in accordance with FA Safeguarding Policies.





SECTION 11:

CONFIDENTIALITY AND INFORMATION-SHARING

SECTION 11:

CONFIDENTIALITY AND INFORMATION – SHARING

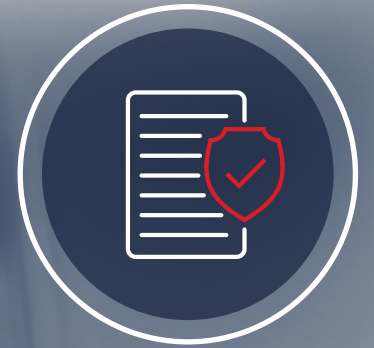
The FA is committed to ensuring the confidentiality of all disclosures, safeguarding incidents and/or allegations and well-being concerns is maintained for everyone concerned. All those working with England must ensure they share information appropriately to keep people safe.

However information comes to light regarding any concerns, this should be handled and disseminated on a 'need to know' basis only, including with relevant partners (e.g. club safeguarding teams, commercial or funding partners) to ensure children and adults are kept safe and that decisions are made in their best interests.

It is appreciated that these decisions can be difficult to make. Where there are concerns about an adult's or child's behaviour or well-being, an initial discussion should take place with the Safeguarding Team (when on-event this should be done via the Event Safeguarding Duty line) and off-event directly to the Safeguarding Team or Safeguarding Case Management Team.

Decisions about who is in the 'need to know' circle may not be easy to make, and will depend on the type of concern, whether it is a live safeguarding issue (to manage immediate risk) and considering what is required to keep people safe.

Information will be stored securely and handled in accordance with applicable data protection legislation and any relevant FA data protection and/or Privacy Policies.



SECTION 12:

POLICY REVIEW

SECTION 12:

POLICY REVIEW

This policy will be reviewed annually, or if there's:

- A change in legislation and/or government guidance.
- A change in National Standards and practice.
- Any other significant change, event or incident.

SECTION 13:

ACKNOWLEDGEMENTS



SECTION 13:

ACKNOWLEDGEMENTS

In developing this policy, The FA has drawn from work undertaken by the NSPCC Child Protection in Sport Unit (CPSU), Ann Craft Trust (ACT) and MIND, alongside HM Government Guidance.

The FA has also sought to align this policy with aspects of the FIFA Guardians' Child Safeguarding Toolkit and the UEFA Child Safeguarding Policy.

APPENDICES

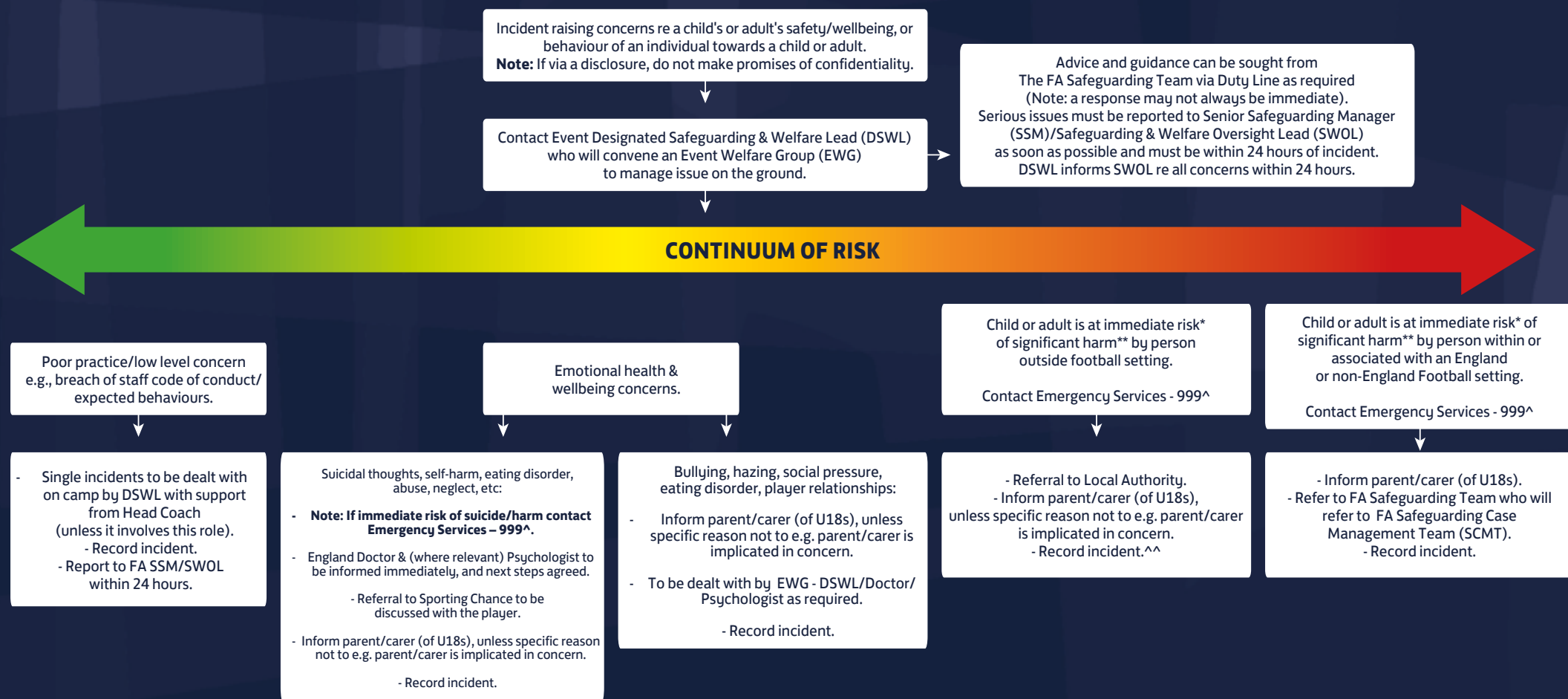
APPENDIX 1. REFERRAL FLOW CHARTS – CONCERNS ARISING ON CAMP

APPENDIX 1. REFERRAL FLOW CHARTS – CONCERNS ARISING AWAY FROM CAMP

APPENDIX 2. USEFUL CONTACTS

APPENDIX 1: REFERRAL FLOW CHARTS

CONCERNS ARISING ON CAMP/ EVENT REPORTING FLOW DIAGRAM



Note: Indents & Concerns relating to FA Staff Members arising from the above:

SSM to discuss with Head of HR / Women's Technical Lead /Line Manager to agree next steps.

HR to manage in line with FA disciplinary processes.

SSM to guide re information sharing re: third party e.g. club.

Serious concerns and/or Repeated Poor Practice / Low Level Concerns (x3 or more) to be referred to FA Safeguarding Case Management Team and/or FA Integrity Team.

* Immediate risk refers to something that is about to happen that will put a child in danger. If the risk is not immediate avoid 999, which is for emergencies. Police can be contacted on 101 for crime prevention advice or to report a crime that does not need an emergency response. Emergency services for non-UK events/camps will be noted in the specific Event Safeguarding Plan.

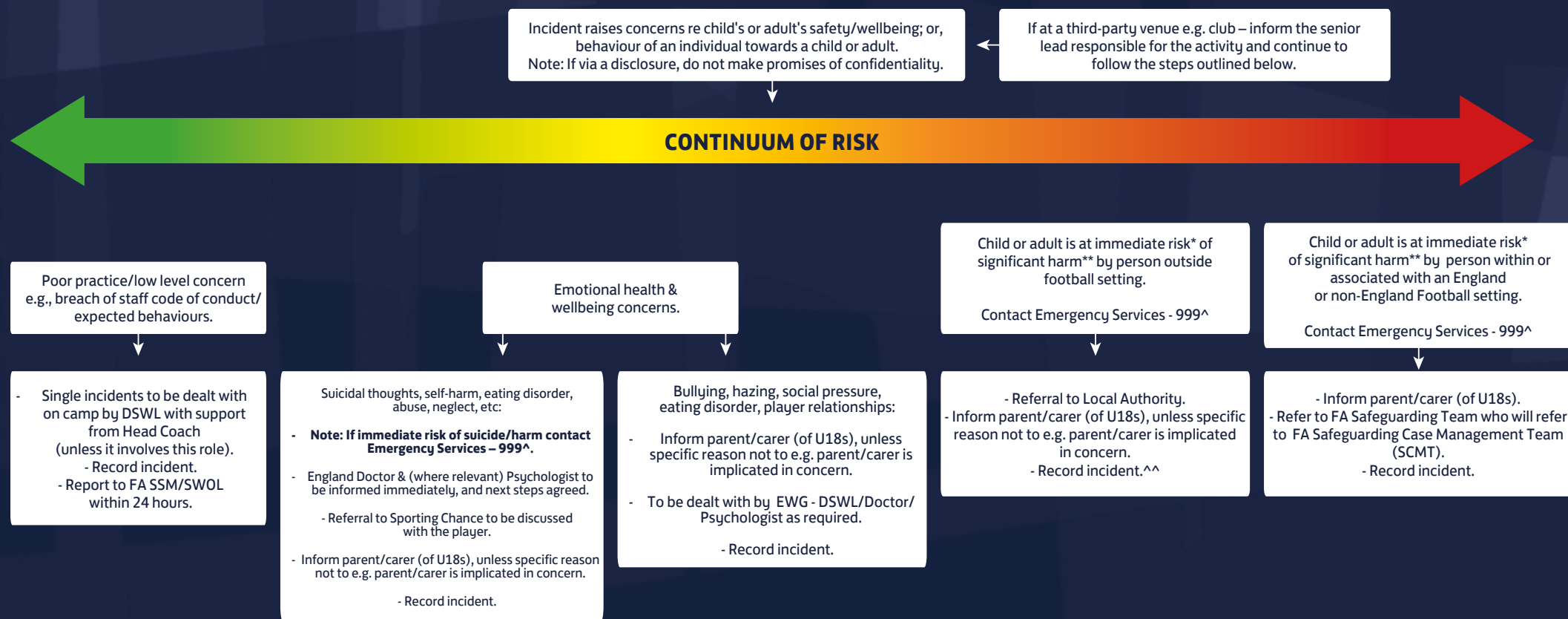
** Significant harm is a result of an incident, or series of incidents, that a child or adult experiences that is likely to have a serious and detrimental effect on their health and development.

^ If emergency services are contacted, follow up referrals must be made to the indicated services. If police have been contacted make a note of crime reference number, name and number of officer you reported it to. When referring to the local authority they may advise you to refer to a specific universal service.

^^ All concerns must be documented and recorded. Records should be accurate and reflect all actions taken to support in managing the concern.

APPENDIX 1: REFERRAL FLOW CHARTS

CONCERNS ARISING AWAY FROM A CAMP / EVENT REPORTING FLOW DIAGRAM



Note: Indents & Concerns relating to FA Staff Members arising from the above:
SSM to discuss with Head of HR / Women's Technical Lead /Line Manager to agree next steps.
HR to manage in line with FA disciplinary processes.

SSM to guide re information sharing re: third party e.g. club.

Serious concerns and/or Repeated Poor Practice / Low Level Concerns (x3 or more) to be referred to FA Safeguarding Case Management Team and/or FA Integrity Team.

* Immediate risk refers to something that is about to happen that will put a child in danger. If the risk is not immediate avoid 999, which is for emergencies. Police can be contacted on 101 for crime prevention advice or to report a crime that does not need an emergency response. Emergency services for non-UK events/camps will be noted in the specific Event Safeguarding Plan.

** Significant harm is a result of an incident, or series of incidents, that a child or adult experiences that is likely to have a serious and detrimental effect on their health and development.

^ If emergency services are contacted, follow up referrals must be made to the indicated services. If police have been contacted make a note of crime reference number, name and number of officer you reported it to. When referring to the local authority they may advise you to refer to a specific universal service.

^^ All concerns must be documented and recorded. Records should be accurate and reflect all actions taken to support in managing the concern.

APPENDIX 2: USEFUL CONTACTS

FA Contacts:

Safeguarding@TheFA.com

External Contacts:

NSPCC Tel: 0808 800 5000

Staffordshire County Council's First Response Service:

Tel: **0300 111 8007** (Monday – Thursday, 8:30am – 5:00pm and Friday 8:30am – 4:30pm).

Emergency Duty Service: (out of hours) Tel: **0345 604 2886**.
Mobile: **07815 492613**.



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