




**CARLISLE UNITED**  
**Safeguarding strategy and action plan**

*“Safer together”*

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Safeguarding Strategic Plan 3 year plan to 30 June 2024 230626 Safeguarding Strategic plan 2324 v2.0		
Next review - annual	By 30 June 2024	1921 Board
Signed		Nigel Clibbens Chief Executive



## 1. Strategic vision

“Safer Together” – is our safeguarding strategy which will guide our work.

“Safer together” strategy is for the period to 30 June 2024 (three years). It is about everybody in the Club creating an embedded culture of constant vigilance in relation to safeguarding in our Club and its activities. We need to embed safeguarding throughout CUFC, and to put in place a preventative strategy which brings the policies and procedures to life.

We recognise that as a professional Club, we have a duty of care to all children, young people and adults at risk who participate in activities delivered by us and who we deal with. This strategy outlines our arrangements to meet that duty.

## 2. Overview

**Carlisle United is committed to safeguarding and promoting the welfare of young players and staff. We expect all staff, volunteers, parents/carers, young players, any partner agencies or any commissioned service providers to share this commitment.**

We have a proactive and integrated approach to safeguarding. As a Club we will leave no stone unturned in relation to developing our approach to safeguarding. We will do everything within our power to prevent harm and abuse from happening within our Club and when allegations and disclosures occur, we will respond quickly, appropriately and effectively in order to safeguard those in our care.

There can be no safe sport in an unsafe society, we expect sport and ourselves to be held to a higher standard. We can reduce risks and learn from previous cases.

Carlisle United has developed, and will continually review, our safeguarding policies including a Children Protection Policy and an Adults at Risk Policy as well as our overall Safeguarding Policy, Safeguarding Strategy, Safeguarding Risk Register and working methods for our operations.

Our documents endorse and promote our Safeguarding Policy and Procedures.

### 3. Strategic Aims

We have identified four strategic aims, that underpin our approach to safeguarding. These are consistent with those of the EFL.

#### 1 Prevention & Protection

- 1.1. **Robust leadership** across the Club. All activity contributes to safeguarding and is everyone's business regardless of role and responsibility. There needs to be clear accountability and for a clear reporting structure to be developed for safeguarding.
- 1.2. Getting the **right people involved** seeking references and doing Disclosure and Barring Service checks on those working in eligible roles with children.
- 1.3. **Transparent and accountable governance** arrangements and structures in relation to safeguarding
- 1.4. Continue to develop **robust procedures and working practices**:
  - 1.4.1. **Safer recruitment** and selection of all staff and volunteers within our Clubs creating a safe environment – providing education and best practice advice and guidance and promoting codes of conduct
  - 1.4.2. **Case-handling**: An established process for managing handling individual cases and allegations, supported by risk management procedures, where necessary including low level concerns
  - 1.4.3. Clearly defined **ways to report concerns**
  - 1.4.4. Promoting **clear systems** – outlining policy, regulations, reporting and case handling procedures.
- 1.5. Through **work with EFL, FA and LFE**, external audits and NGB develop (such as LDO and CSCP) and enhance opportunities and activities which equip young people to stay safe, and that encourage self-motivation, self-esteem and build emotional resilience.

#### 2. Performance Monitoring & Ensuring Consistency

- 2.1. Collate and analyse and **act on findings from audit visits** by EFL and independent agencies in order to target action
- 2.2. **Produce a Strategic Plan** for safeguarding with SMART targets and regularly report to the 1921 Board on progress against them
- 2.3. Instigate robust **data collection and monitoring/reporting** across the Club to demonstrate distance travelled and highlight areas of concern
- 2.4. **Review data collection systems** to ensure they include all areas required including protected characteristics and areas of abuse/concern so that patterns and trends can be monitored and interventions put in to place when identified

#### 3. Performance Learning & Improvement

- 3.1. Demonstrate that we are a 'Learning Club' evidencing **continuous improvement informed by best practice** and national research/guidance
- 3.2. **Utilise EFL, FA information and our own findings** on best practice
- 3.3. Utilise data to **formulate a Training Needs Analysis and plan** in relation to safeguarding for the current and forthcoming seasons
- 3.4. Use Risk rating from Club visit findings to help to **identify concerns and needs** in relation to training requirements
- 3.5. **Take learning and research opportunities** that help us to better understand safeguarding in order to inform practice in the future
- 3.6. **Provide necessary resource** needed to drive forward the safeguarding strategy to implement the plan.

#### 4. Policy & Procedure

- 4.1. **Streamline complex policies and procedures and support SSM and DSO and MDSO** to do the right thing. Staff will be enabled to be confident in their practice by providing training and access to quality management, supervision and consultation
- 4.2. **Listening to views of parents and young people and adults at risk**
- 4.3. **Work with NGB's** where necessary to include a duty to report for sport and for sports coaches and scouts to be classified as a position of trust
- 4.4. **Ensure all policies and procedures have annual review dates** and are ratified by the appropriate individual and boards



## 4. Strategic standards

We have identified seven Strategic Standards, consistent with those of the EFL which are our areas of focus to achieve our Strategic Aims:

- i. **Leadership, governance, and culture** – Safeguarding is embedded in Club leadership, governance, and culture with a clearly owned strategy and a safeguarding plan with clear accountability for actions.
- ii. **Roles and responsibilities** - Everyone takes responsibility for safeguarding Roles and responsibilities.
- iii. **Prevention; policies, procedures and practice** –
  - i. There are **effective safeguarding and related policies, procedures and practices in place**. These are consistently implemented, regularly reviewed and improved.
  - ii. **Safer recruitment procedures** in place to prevent unsuitable individuals from working with, having access to, or influence over children and adults at risk
- iv. **Educating and empowering** – Children and Adults at Risk are informed about their rights and everyone is equipped with safeguarding knowledge and skills.
- v. **Protection** – Concerns and complaints are taken seriously and responded to swiftly and appropriately.
- vi. **Working together** – There is a clear commitment to working together to promote and protect the safety and welfare of Children and Adults at Risk.
- vii. **Listening culture** – There is a culture that promotes listening and respecting.

## 5. Responsibility and review

The CEO will draft the Strategy in consultation with the Safeguarding Team of the SSM DSO and MDSO.

It will be implemented on a daily basis by the Safeguarding Team comprising the SSM DSO and MDSO reporting to the CEO.

This Strategy will be kept up to date, particularly as the Club changes in nature and size and new requirements emerge.

To ensure this, the Strategy and the way it is implemented, will be reassessed and amended on an ongoing basis and reviewed on an annual basis over the three years as follows:

- The Strategy will be reassessed and amended on an ongoing basis by the CEO
- The 1921 Board will:
  - consider Safeguarding as an agenda item and feature in the Board Report
  - conduct an annual review of the Strategy and progress by 30 June each year
  - publish the Strategy on its website
- The Holdings Board will ensure the 1921 Board undertakes its role as stated

## 6. Action plan

### Standard 1 - Leadership, governance and culture - Safeguarding is embedded in organisational leadership, governance and culture

Ref	Standard	Issue	Action	Who?	Status
1.1	<p>Responsibility and accountability for safeguarding exists at the highest level of the Club.</p> <p>There is demonstrable top-level commitment to safeguarding that creates and reinforces attitudes and behaviours that value children and adults at risk, creates a culture of accountability and drives continuous improvement.</p>	<p>There is a safeguarding strategy with actions forming an implementation plan.</p> <p>It includes actions that support and work towards achieving the safeguarding strategy aims.</p> <p>The plan is appropriately resourced, for example: staff, time, work programmes and budget.</p>	<p>SAFEGUARDING STRATEGY AND ACTION PLAN TO BE:</p> <ul style="list-style-type: none"> <li>PREPARED BY CEO</li> <li>ADOPTED BY 1921 BOARD</li> </ul> <p>Establish Safeguarding structure – detailing how approach fits together</p> <ul style="list-style-type: none"> <li>DETAILED WITHIN THE STRATEGIC PLAN SECTIONS 1-4</li> <li>SAFEGUARDING STRUCTURE CHARTS</li> </ul> <p>Prepare and maintain Safeguarding Risk Register</p> <ul style="list-style-type: none"> <li>PREPARED BY CEO</li> <li>ADOPTED BY 1921 BOARD</li> </ul> <p>CEO appointed as SSM</p> <p>Safeguarding to be a standing agenda item within Executive reports at Board meetings.</p> <p>Reports will demonstrate action alongside strategy objectives – in 1921 board minutes and Holdings will get copy of 1921 board minutes</p>	<p>CEO 1921</p> <p>CEO</p> <p>CEO 1921</p> <p>CEO</p> <p>CEO 1921</p> <p>1921</p> <p>CEO</p> <p>CEO</p>	<p>Done Done</p> <p>Done Done</p> <p>DONE</p> <p>Done</p> <p>DONE</p> <p>DONE</p> <p>DONE</p>
1.2	<p>Named personnel including:</p> <ul style="list-style-type: none"> <li>Board member</li> <li>Senior Manager and</li> <li>Designated Safeguarding Officer</li> </ul> <p>who are responsible for safeguarding within the Club.</p> <p>There is a named Safeguarding DSO with clearly defined roles and responsibilities to lead on safeguarding and child protection</p>	<p>Names and contact details of these individuals will be published on the Club website, and clear procedures for</p> <ul style="list-style-type: none"> <li>escalating concerns relating to safeguarding and</li> <li>whistleblowing made available and understood by all staff and stakeholders</li> </ul>	<p>SSM job role approved</p> <p>DSO job role approved</p> <p>Safeguarding contact details available on:</p> <ul style="list-style-type: none"> <li>Each policy</li> <li>Club Charter</li> <li>Club Safeguarding Contacts page on website</li> <li>Whistleblowing policy in staff handbook and on website</li> <li>Complaints policy, Low level concern policy and Managing allegations policy all on web site</li> </ul> <p>Safeguarding Contacts list on web</p>	<p>1921</p> <p>1921</p> <p>CEO</p> <p>SSM</p>	<p>DONE</p> <p>DONE</p> <p>DONE</p> <p>DONE DONE</p>

## Standard 2 - Roles and responsibilities - Everyone takes responsibility for safeguarding

Ref	Standard	Issue	Action	WHO?	Status
2.1	<p>While the Board is ultimately responsible for ensuring that effective safeguarding policies and processes are in place, there is a clear expectation that safeguarding should be considered by everyone.</p> <p>There are clear lines of accountability for safeguarding.</p> <p>There are staff with specific strategic and operational responsibilities for</p> <ul style="list-style-type: none"> <li>• <a href="#">safeguarding and</a></li> <li>• <a href="#">safer recruitment.</a></li> </ul> <p>Safeguarding roles and responsibilities are clearly defined and regularly reviewed</p> <p>Everyone champions attitudes, behaviours and practices that respect the rights of all children and adults at risk and promotes their safety and welfare</p>	<ul style="list-style-type: none"> <li>• <a href="#">There is a Board-level member of staff who takes leadership responsibility for the club's safeguarding arrangements (CEO)</a></li> <li>• <a href="#">There is a club safeguarding lead with the necessary skills and expertise (SSM)</a></li> </ul> <p>There is an academy safeguarding officer (DSO)</p> <ul style="list-style-type: none"> <li>• <a href="#">responsible for raising safeguarding awareness</a></li> <li>• <a href="#">within the academy in consultation with the club's safeguarding lead</a></li> <li>• <a href="#">There is a member of staff responsible for ensuring compliance by the club with its safer recruitment policies and procedures. This is SSM</a></li> <li>• <a href="#">The club ensures that safeguarding officers have protected time and support to fulfil their</a></li> </ul> <p>Safeguarding Policy should refer to "Duty of Care"</p>	<p>Policies will be kept up to date, particularly as the Club changes in nature and size and new requirements emerge as per each policy</p> <p>Policies and the way they are implemented, will be reassessed and amended on an ongoing basis and reviewed annual basis will be as follows:</p> <p>Safeguarding issues will be considered as agenda items and discussed at the:</p> <ul style="list-style-type: none"> <li>o Safeguarding Working Group meetings</li> <li>o Academy Management Team meeting</li> <li>o Technical Board meetings</li> </ul> <p>The Policies will be reassessed and amended on an ongoing basis by the CEO in consultation with the Safeguarding Working Group</p> <p>The 1921 Board will:</p> <ul style="list-style-type: none"> <li>o include Safeguarding as an agenda item and feature in the Board Report</li> <li>o conduct an annual review of the Policy as part of the annual review</li> <li>o publish the Policy on its website</li> </ul> <p>The Holdings Board will ensure the 1921 Board undertakes its role as stated at its board meetings</p>	<p>DSO and SSM</p> <p>SWG CEO 1921</p> <p>SSM DSO TB</p> <p>SWG</p> <p>1921</p> <p>Holdings</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>JUNE each year</p> <p>Ongoing</p> <p>Ongoing</p>
2.2	<p>Delegation of responsibilities is clear and there is a positive culture that embraces safeguarding.</p> <p>The policies and procedures are reviewed on a regular basis and comply with legislation.</p>	<p>Club and Academy Policy and Procedures should be reviewed annually at minimum or whenever there is a legislative change, to maintain guidance and compliance with national and local legislation.</p>	<p>Ongoing review by CEO and Safeguarding team</p> <p>Annual review by 1921 and Holdings</p>	<p>CEO</p> <p>1921 Holdings</p>	<p>Ongoing</p>



**Standard 3 - Prevention; policies, procedures and practice**  
**(a) There are effective safeguarding and related policies, procedures and practices in place, consistently implemented, regularly reviewed, improved**

Ref	Standard	Issue	Action	Who?	Status
3.1	The Club clearly communicates any changes in policy to all relevant staff  The Safeguarding policy and complaints policy should be actively promoted and accessible to all staff, parents/carers and young people	The Club has written and published safeguarding policies and procedures available to all	All policies on the website including: <ul style="list-style-type: none"> <li>Managing Allegations Policy</li> <li>Complaints Policy</li> </ul> All policies in Staff Handbook All policies in the Academy Handbook  SWG shares best practice. Update at Weekly staff meetings and via email	SSM  CEO DSO SSM CEO	DONE  DONE DONE Ongoing
3.2	Policies and Procedures in place  Safeguarding policies and procedures are consistent with: legislation, statutory guidance, football authority rules, requirements, guidance and good practice  Club academy procedures meet Ofsted and Keeping Children Safe in Education safeguarding requirements	Policies, procedures and education make clear that safeguarding is everyone's responsibility  There is an IT acceptable use policy and web filtering procedures that apply to everyone utilising club electronic and IT systems	Establish policies: <ul style="list-style-type: none"> <li>Safeguarding Policy</li> <li>Child Protection Policy</li> <li>Vulnerable Adults</li> <li>Anti radicalisation Policy</li> <li>Whistleblowing Policy</li> <li>Managing Allegations Policy</li> <li>Complaints Policy</li> </ul> Implement findings of EFL and LFE audits  Use NGAs to review policies and procedures Implement web filtering system on Network	SSM DSO CEO  SSM SSM FD	DONE and updated June 22 Reviewed June 23  Barnados ongoing Ongoing DONE
3.3	The identification and mitigation of safeguarding risk is incorporated into effective risk assessment processes at all levels i.e. from identification of organisational risks through to planning an activity		Prepare and maintain Safeguarding Risk Register Risk Assessments in place for key risks identified in the SSR: <ul style="list-style-type: none"> <li>Mental Health Plan - action plan</li> <li>Accommodation + Code of conduct and accommodation policy</li> <li>Overseas trips</li> <li>Transport (away travel) / Transport Policy</li> <li>Changing rooms +- Changing Room Policy</li> <li>Training facilities and sites</li> <li>Loan Player policy</li> <li>Catch up of studies policy</li> <li>Late and non collection policy</li> </ul>	CEO DSO	DONE  DONE DONE  New each trip DONE DONE DONE DONE DONE DONE
3.4	The Safeguarding policy and complaints policy should be actively promoted and accessible to all staff, parents/carers and young people		On website		DONE

## Standard 3b – Recruitment and Selection

Ref	Standard	Issue	Action	Responsibility	Status
3.5	The Club has safer recruitment and selection procedures for all personnel including volunteers in line with Keeping Children Safe in Education	<p>Club Safeguarding Policy or Recruitment policy should make reference to Sexual Offences Act 2003 and a paragraph on what info should be reported to DBS and to FA</p> <p>Deal with issues of concern in accordance with Managing Allegations Policy</p>	<p>Safer Recruitment policy in place</p> <p>Recruitment working method</p> <p>Induction Checklist for each new starter:</p> <ul style="list-style-type: none"> <li>Completed by DSO</li> <li>Checked by SSM</li> </ul> <p>Complete from YD2 self- declaration form for all staff annually no later than 1 July each year. Counter sign by DSO.</p> <p>Include on SCR (rule 13)</p>	<p>CEO SSM</p> <p>SSM</p> <p>DSO</p> <p>SSM</p> <p>All staff</p> <p>DSO</p> <p>MDSO</p>	<p>DONE</p> <p>DONE</p> <p>Ongoing</p> <p>Annually by 1 July</p>
3.6	<p>The Clubs recruitment and selection procedures include methods for exploring candidates' attitudes to children and perception of acceptable behaviour</p> <p>Recruitment and selection procedure and HR process that seeks to identify individuals who are unsuitable to work with children, young people and adults at risk</p> <p>Recruiting managers demonstrate confidence and awareness of the club's safer recruitment policies, procedures and expectations</p> <p>Safer recruitment policies and procedures are consistently implemented</p>	<p>Safer recruitment procedures include:</p> <ul style="list-style-type: none"> <li>✓ Ensuring recruiters and interviewers are appropriately trained and supported</li> <li>✓ a thorough application process</li> <li>✓ Openly promote the club's commitment to safeguarding when advertising roles that involve working with children/adults at risk</li> <li>✓ Scrutinising information provided in applications and CVs</li> <li>✓ Conducting value and competency-based interviews</li> <li>✓ Obtaining at least two written references</li> <li>✓ Qualification verification</li> <li>✓ Identity verification</li> <li>✓ Where there is eligibility, criminal record checks and adherence to the rechecking period outlined in club policies</li> <li>✓ Measures to assess and manage risk in relevant circumstances</li> <li>✓ Role descriptions which properly record responsibilities</li> <li>✓ Employment contracts, casual worker and volunteer agreements</li> </ul>	<p>Safer Recruitment Policy in place</p> <p>Single central record should be kept to record attendance for safeguarding training for ALL staff</p> <p>Adverts to include commitment to Safeguarding</p> <p>Safeguarding statements are delivered at all interview panels for all interview</p> <p>Enhanced or standard DBS checks are completed on all staff and volunteers who have contact with children and young people (stewards)</p> <p>Safeguarding question should be asked at all interview panels if you want to create a culture of "Safeguarding is everybody's responsibility" From the Kit person to the CEO</p> <p>Induction Checklist in place:</p> <p>Recruitment working method in place, detailing:</p> <ul style="list-style-type: none"> <li>Roles and responsibilities</li> <li>Actions</li> <li>Records and process</li> </ul>	<p>CEO</p> <p>MDSO</p> <p>MDSO</p> <p>DSO</p> <p>DSO/MDSO</p> <p>DSO</p> <p>DSO/SSM</p> <p>DSO/SSM</p>	<p>DONE</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>DONE</p> <p>DONE</p>



3.7	Enhanced or standard DBS checks are completed on all staff and volunteers who have contact with children and young people	Stewards that work in family enclosures, disability stand and stop and search should be DBS checked at the highest level	Stewards that work in the family enclosure, disability and stop and search all have appropriate DBS checks	MDSO	ONGOING
3.8	Recruitment and selection procedures include methods for exploring candidates' attitudes to children and adults at risk, perception of acceptable behaviour	Safeguarding is embedded within the interview process.  Value based interviewing takes place Candidates are asked safeguarding related questions at interview which demonstrates the candidate's knowledge and previous experience in relation to safeguarding	Interview Notes Report - to record meeting discussion  - Safeguarding questions asked - DSO/SSM preseny  Electronic file for each new recruit	Interviewees	ONGOING
3.9	Additional vulnerability is carefully considered, and appropriate measures and support provided, for example: those with disabilities, from BAME backgrounds, those who identify as LGBTQ, those in elite sporting environments, Children playing or working in an adult environment, those in substitute accommodation arrangements, those in care, care leavers and looked after children	Policies, guidance and training address additional vulnerability to support staff understanding and equip them with the necessary knowledge and skills to meet the needs of children and adults at risk The club is aware of numbers of vulnerable individuals it engages with. There is demonstrable evidence that they are adequately safeguarded and that their needs are being met The club seeks relevant information about additional needs and demonstrates that these are met. Skilled and experienced staff are deployed to meet the needs of children and adults at risk Additional staff are resourced where required, over and above standard staff to child and/or adult at risk ratios	Specific training for SSM DSO MDSO  Utilise, EFL , FA and local authority resources: (LADO resources)  Utilise CSCP training e-learning modules  New EDI EAP strategy	SSM    Board CEO	ONGOING  DONE  Ongoing  August 2023 TARGET
3.10	The club's recruitment and selection procedures include methods for exploring candidates' attitudes to children and adults at risk, perception of acceptable behaviour	Safeguarding is embedded within the interview process. Value based interviewing takes place Candidates are asked safeguarding related questions at interview which demonstrates the candidate's knowledge and previous experience in relation to safeguarding	Interview questions list in operation	DSO	DONE

3.11	<p>Additional vulnerability is carefully considered, and appropriate measures and support provided, for example: those with disabilities, from BAME backgrounds, those who identify as LGBTQ, those in elite sporting environments, Children playing or working in an adult environment, those in substitute accommodation arrangements, those in care, care leavers and looked after children</p>	<p>Policies, guidance and training address additional vulnerability to support staff understanding and equip them with the necessary knowledge and skills to meet the needs of children and adults at risk The club is aware of numbers of vulnerable individuals it engages with. There is demonstrable evidence that they are adequately safeguarded and that their needs are being met The club seeks relevant information about additional needs and demonstrates that these are met Skilled and experienced staff are deployed to meet the needs of children and adults at risk Additional staff are resourced where required, over and above standard staff to child and/or adult at risk ratios</p>	<p>Coaches to undertake EFL and FA remote digital training to upskill knowledge</p> <p>Build relations with LADO and CSCP and police</p>	<p>DSO</p> <p>DSO SSM MDSO</p>	<p>ONGOING</p> <p>DONE</p>
3.12	<p>The club articulates its values and expectations of behaviour in codes of ethics and conduct</p> <p>There is an environment where individuals feel comfortable and confident in challenging and/or reporting breaches.</p> <p>There are clear procedures and support available for individuals reporting a breach and those finding themselves the subject of a complaint/ allegation.</p> <p>Breaches are taken seriously and acted on in line with relevant procedures, for example, staff disciplinary procedures and managing allegations against staff</p>	<p>Club values and expected standards of behaviour are in place for all staff, children, adults at risk, their parents/ carers and activity spectators Consequences and procedures for dealing with breaches are made clear Expected standards of staff behaviour include information about positions and relationships of trust There are measures to assess awareness and understanding. Work is undertaken to provide clarity and further guidance where necessary</p>	<p>Academy information book (section 4) contains codes of conduct for:</p> <ul style="list-style-type: none"> <li>• <a href="#">coaches</a></li> <li>• <a href="#">parents</a></li> <li>• <a href="#">players</a></li> </ul> <p>Club Staff Handbook contains:</p> <ul style="list-style-type: none"> <li>• <a href="#">ethics and conduct (section 4)</a></li> <li>• <a href="#">staff social media policy (section 12)</a></li> <li>• <a href="#">disciplinary process in staff handbook (section 5)</a></li> </ul> <p>Accommodation code of conduct in place Also in place</p> <ul style="list-style-type: none"> <li>• <a href="#">Whistleblowing Policy</a></li> <li>• <a href="#">Managing Allegations Policy</a></li> <li>• <a href="#">Complaints Policy</a></li> <li>• <a href="#">Working method</a></li> <li>• <a href="#">Sexting Policy</a></li> <li>• <a href="#">Lone Working Policy</a></li> </ul>	<p>CEO SSM DSO</p>	<p>DONE June 22</p> <p>Updated June 23</p> <p>Updated June 23</p> <p>Updated June 23</p>



	<p>Safeguarding and related procedures are implemented and there are measures to evaluate implementation and understanding. Where appropriate, implementation priorities are identified and resourced.</p> <p>There are quality assurance processes to assess understanding, implementation and consistency in delivery</p>	<p>Everyone demonstrates awareness of and confidence in the club's safeguarding policies, procedures and expectations. There is demonstrable evidence that safeguarding and related policies and procedures are consistently implemented across club activities.</p>	<p>All key policies are public on the website</p> <p>Ongoing confirmations of compliance from DSO MDSO to SSM and CEO</p> <p>External review by EFL External review by LADO External review by Barnado's</p> <p>Budget for dedicated resource 23/24</p>	<p>CEO</p> <p>DSO MDSO</p> <p>EFL LADO Barnado's</p> <p>Holdings</p>	<p>DONE April 21/4 Ongoing</p> <p>Done N/A By 31/5/21</p> <p>DONE</p>
3.9	<p>The club regularly assesses whether procedures are effective in practice or if further development or improvement is required</p> <p>Feedback is sought from all levels of the club as part of the review process to assess the extent to which procedures are embedded, identify any gaps in procedures and to ensure they are cohesive, for example: activity debriefs, focus groups, online surveys and training evaluation processes</p>	<p>Safeguarding and related policies and procedures are reviewed annually or whenever there is a significant change in the club, legislation, statutory or football authority guidance, or after any significant safeguarding incident.</p> <p>Review periods and policy versions are included in policies and procedures and a record of changes/ additions is kept</p>	<p>Annual review by:</p> <ul style="list-style-type: none"> <li>- SWG – MDSO DSO SSM</li> <li>- CEO</li> <li>- 1921 board</li> <li>- Holdings Board</li> </ul> <p>External review by LADO [sought]</p> <p>Annual EFL Safeguarding Audits</p> <p>Version details recorded on each policy</p> <p>Ongoing internal audit checks – new system to be put in place</p>	<p>All internal</p> <p>LADO</p> <p>EFL</p> <p>SSM</p> <p>SSM Ongoing</p>	<p>By 30/6/22</p> <p>N/A</p> <p>DONE</p> <p>DONE</p> <p>From 30/6/22</p>

## Standard 4 – Educating and empowering

Children and adults at risk are informed about their rights and everyone is equipped with safeguarding knowledge and skills. Staff induction, training and development

Ref	Standard	Issue	Action	Responsibility	Status
4.1	Everyone is made aware of their safeguarding responsibilities and the club's expectations of them when commencing their role	<p>Ensure all staff can access all relevant safeguarding policies and procedures online. ( staff access only).</p> <p>The Club has induction processes for all staff and volunteers that includes familiarisation with safeguarding policies and procedures</p>	<p>Induction process is now delivered for new staff across Academy and Club</p> <ul style="list-style-type: none"> <li>- <a href="#">Complaints Policy</a></li> <li>- <a href="#">Safeguarding Policy</a></li> <li>- <a href="#">Equality Policy</a></li> <li>- <a href="#">Whistleblowing Policy</a></li> </ul> <p>All on website</p> <p>STAFF HANDBOOK CIRCULATE ANNUALLY</p>	<p>DSO</p> <p>CEO</p>	<p>DONE</p> <p>DONE NY 31/7/22</p>
4.2	<p>There is a clear commitment to developing a workforce who are competent and empowered to create safe environments, recognise safeguarding concerns and risks, and take appropriate action when an issue arises</p> <p>Budget and resource requirements are identified and made available to deliver the workforce development plan</p> <p>Staff with specific strategic and operational responsibility for safeguarding undertake regular continuing professional development training in the safeguarding of children and adults at risk, approved by their respective League, and maintain a record thereof</p>	<p>A needs analysis and training plan should be developed over the next 6 months. Training should include as a minimum, an understanding of legislation and football regulations regarding safeguarding, recognising indicators and signs of abuse.</p> <p>The club communicates changes to safeguarding and related policies and procedures to relevant stakeholders, for example: through education, staff briefings, email correspondence and team meetings</p> <p>The safeguarding workforce development plan exceeds basic requirements and includes education over and above The FA's Safeguarding Children Workshop</p>	<p>Safeguarding training is included in induction programmes for all staff and ongoing safeguarding training is offered and delivered</p> <p>Training plan should include all departments across the Club</p> <p>DSO for the Academy Completes a Training needs Analysis. This now needs to inform the training plan and cascaded out to all staff across the Club</p> <p>NEED TO TRAIN DIRECTORS ESPECIALLY HOLDINGS</p> <p>SSM and DSO to look at Local Safeguarding Board for safeguarding training opportunities for all staff across the Club.</p> <p>SSM and DSO to attend future EFL training</p>	<p>DSO</p> <p>DSO</p> <p>DSO</p> <p>SSM</p> <p>DSO SSM</p> <p>SSM DSO</p>	<p>DONE</p> <p>ONGOING By 30/6/22</p> <p>ONGOING By 30/6/22</p> <p>ONGOING By 30/6/22</p> <p>ONGOING By 30/6/22</p> <p>ONGOING</p>

Ref	Standard	Issue	Action	Responsibility	Status
4.3	<p>Children and adults at risk are informed about their rights to protection from abuse, exploitation and mistreatment and are empowered to report concerns</p> <p>The club empowers and educates children and adults at risk about their rights, safety and welfare in physical and online environments, eg: education, activity resources, handbooks, induction processes, parent's evenings and activity briefing sessions.</p> <p>Budget and resource requirements are identified and made available</p>	<p>Internal and external routes for raising concerns, making complaints, seeking support and advice are widely promoted to children, adults at risk and their parents/carers</p> <p>Children and adults at risk demonstrate an awareness of their rights to be safe and heard</p> <p>Staff, children, adults at risk and their parents/ carers demonstrate a sound awareness of and confidence in the club's safeguarding procedures</p>	<p>Circulate EFL documents to parents</p> <p>EFL plan on web site</p> <p>Highlight in induction events – annually each season</p> <p>Quarterly safeguarding update to parents, coach, and players</p> <p>Ad-hoc communication as required</p> <p>New budget to be in place for 21/22</p>	<p>MDSO</p> <p>SSM</p> <p>DSO</p> <p>DSO</p> <p>DSO</p> <p>CEO</p>	<p>DONE</p> <p>DONE</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>
4.5	<p>Senior staff are kept up-to-date with changes in statutory requirements and new, evidence-based ways of working</p>	<p>Safeguarding and related policies and procedures are widely promoted and easily accessible, for example: intranet, shared drive, induction materials, handbooks, activity literature, pocket/quick reference guide and education resources</p> <p>The role and contact details of staff who hold specific operational responsibility for safeguarding is made known to staff, partners, children, adults at risk and their parents/carers in any handbook or the like produced to accompany any activity</p> <p>There is an easily accessible section on the club's website which includes: a clear statement of the club's commitment to safeguarding, the name and contact details of staff who hold specific operational responsibility for safeguarding, and a copy of its safeguarding policies and procedures</p>	<p>Quarterly safeguarding update to parents, coach, and players (as above)</p> <p>Policies on k drive</p> <p>Safeguarding contacts are on website</p> <p>Safeguarding section on the website Key policies on the website</p>	<p>DSO</p> <p>SSM</p> <p>SSM</p>	<p>DONE</p> <p>DONE</p> <p>DONE</p>

## Standard 5 - Complaints, Allegations and Whistleblowing

Ref	Standard	Issue	Action	Responsibility	Status
5.1	<p>The Club has effective policies and systems in place to manage concerns and complaints as well as compliments from service users or other professionals</p> <p>There are clear, effective and widely promoted procedures for raising complaints and whistleblowing</p>	<p>Standalone Complaints policy to be amended so that it includes the different stages of the complaint, including timelines. Alternatively adopt and amend the EFL example one that is on the CPS system.</p> <p>Ensure standalone complaints policy is available for all to access on the Club website</p>	<p>Available on Club charter on official website</p> <ul style="list-style-type: none"> <li>- <a href="#">Complaints Policy</a></li> <li>- <a href="#">Safeguarding Policy</a></li> <li>- <a href="#">Equality Policy</a></li> <li>- <a href="#">Whistleblowing Policy</a></li> <li>- <a href="#">Managing Allegations (allegations form)</a></li> <li>- <a href="#">Low Level Complaints</a></li> </ul>	SSM	DONE
5.2	<p>There are written policies and procedures for managing safeguarding concerns and allegations against staff</p> <ul style="list-style-type: none"> <li>• <a href="#">Policies and procedures for managing safeguarding concerns and allegations against staff are consistently implemented and regularly reviewed</a></li> <li>• <a href="#">Processes and decisions are child/adult at risk-centered and outcome-focused</a></li> <li>• <a href="#">There is an impartial investigation process for dealing with safeguarding concerns</a></li> <li>• <a href="#">Records demonstrate that all concerns are taken seriously and dealt with appropriately</a></li> <li>• <a href="#">Support is available for individuals reporting concerns, those affected by safeguarding concerns, and where appropriate, those finding themselves the subject of an allegation</a></li> </ul>	<p>External routes and contacts are promoted alongside formal internal procedures</p> <p>All concerns and reports are taken seriously and acted upon appropriately</p> <p>Staff demonstrate a sound awareness of and confidence in the club's grievance and whistleblowing procedures</p> <p>Children, adults at risk and their parents/carers demonstrate a sound awareness of and confidence in the club's procedures for raising concerns and complaints</p>	<p>Complaints Policy in place</p> <p>Bullying and Harassment Policy in place</p> <p>Grievance and Disciplinary Policy in place (Staff Handbook)</p> <p>Managing Allegations Policy (pls allegations form)</p> <p>Low level concerns policy in place (plus low level report form)</p> <p>SSM log in place</p>	<p>SSM</p> <p>SSM</p> <p>SSM</p> <p>SSM</p> <p>SSM</p> <p>SSM</p>	<p>DONE</p> <p>DONE</p> <p>DONE</p> <p>DONE</p> <p>DONE</p> <p>DONE</p>
5.3	<p>The Club has a named senior officer and senior manager(s) with responsibility for ensuring the Club follows these procedures effectively</p>		<p>DSO and SSM contact details are now available on Club Website</p> <p>Audit of HR practices working method</p>	<p>CEO</p> <p>SSM</p>	<p>DONE</p> <p>DONE</p>



5.4	<p>All complaints and allegations of abuse are recorded, monitored and available for internal and external audit</p> <p>There is an electronic case management system</p>	<p>There is an effective electronic case management system for recording and tracking concerns and allegations pertaining to the safety and welfare of children and adults at risk</p> <ul style="list-style-type: none"> <li>• Clear and comprehensive records are kept of all concerns and complaints, details of handling details of any action taken,</li> <li>• decisions reached and how these were reached, as well as any learning outcomes</li> <li>• Records are handled and stored securely in line with relevant legislation</li> </ul>	<p>To develop a mechanism to log and record</p> <p>a) the number of incidents, b) the nature of incidents, c) the number of complaints and allegations for both Club and trust</p> <p>Implement:</p> <ul style="list-style-type: none"> <li>• Issues of Concern Report Form</li> <li>• Low level concerns policy</li> <li>• SSM log</li> <li>• Allegations Form</li> </ul> <p>Adopt and implement appropriate IT system Toot Toot adopted</p>	<p>DSO</p> <p>SSM</p> <p>1921 Board</p>	
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**Standard 6 – Working together - There is a clear commitment to working together to promote and protect the safety and welfare children and adults at risk**

Ref	Standard	Issue	Action	Responsibility	Status
6.1	<p>Working together underpins the work undertaken to promote and protect the safety and welfare of children and adults at risk</p> <p>Safeguarding is actively promoted and embedded within all partnerships and commissioned services</p> <p>Work with multi-agency partners in relation to child protection as detailed in government documents Keeping Children Safe in Education and Working Together.</p>	<p>There is a multidisciplinary approach to promoting and protecting the safety, welfare and wellbeing of children and adults at risk</p> <ul style="list-style-type: none"> <li>• Safeguarding is a key consideration during activity planning, delivery and reviews</li> <li>• Safeguarding policies and expectations are communicated to partners, third parties and suppliers</li> <li>• The club assesses partner, third party, consultant and supplier suitability, and the adequacy of their safeguarding and safer recruitment policies and practices</li> <li>• There is evidence of effective information and working together to assess and mitigate risk, and to protect the safety and welfare of children and adults at risk</li> <li>• Contractual agreements clearly outline respective safeguarding responsibilities</li> <li>• Partners, third parties and suppliers are trained in the club's safeguarding policies and practices</li> <li>• There are quality assurance measures in place to assess safeguarding practice and consistency in delivery</li> </ul>	<p>DSO now does this at induction and is also covered in the staff handbook. Posters are also available across the Club and academy</p> <p>Develop system and approach to suppliers</p>	<p>DSO</p> <p>CEO SSM DSO</p>	<p>DONE</p> <p>By 30/6/22</p>
6.2	<p>Ensure information on children and their family, which is of a personal and sensitive nature, is accurate, up to date and kept confidential in line with GDPR regulations</p>	<p>To Check with the Web filtering company for Club and academy, if they produce reports for the misuse of the internet, as discussed on the day of the visit.</p> <p>Avoid confidential information at SWG</p>	<p>GDPR Policy in place in Club Charter</p> <p>Secure system for medical records</p> <p>Incorporate in IT system</p> <p>SWG working method</p>	<p>FD</p> <p>Head Physio</p>	<p>DONE</p> <p>DONE</p> <p>DONE</p> <p>DONE</p>
6.3	<p>There is a culture that promotes listening and respecting views and wishes. security of personal records in line with GDPR regulations</p>	<p>To include in the Data Protection Policy reference to GDPR</p>	<p>Date Protection Policy reflects new GDPR regulations. Finance Director is the GDPR nominated lead</p>	<p>FD</p>	<p>DONE</p>



## Standard 7 – Children and Young People “Listening culture” - There is a culture that promotes listening and respecting views and wishes

Ref	Standard	Issue	Action	Responsibility	Status
7.1	<p>The Club proactively seeks feedback from stakeholders on a regular basis to strengthen its safeguarding arrangements</p> <p>The club facilitates proactive ways for staff and relevant stakeholders to express their views, participate in decision making and raise concerns</p>	<ul style="list-style-type: none"> <li>• There is demonstrable evidence of how feedback is used to develop and review club policies and practices</li> <li>• There is a supportive internal response to the raising of concerns, complaints and whistleblowing</li> <li>• Consultation measures are regularly evaluated and reviewed</li> </ul>	<p>Use surveymonkey to obtain parent feedback</p> <p>New player settling-in form for late induction and monitoring</p> <p>Low level concern policy</p> <p>Player meetings quarterly</p>	<p>DSO</p> <p>DSO</p> <p>DSO</p> <p>DSO</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>
7.2	<p>There is a culture of listening to children and adults at risk and taking account of their wishes and feelings, both in individual decisions and the development and review of policies and practices</p> <p>The club facilitates proactive ways for children and adults at risk to express their views, participate in decision-making and raise concerns</p>	<ul style="list-style-type: none"> <li>• There are established online and offline measures used to consult children and adults at risk</li> <li>• Children and adults at risk are provided with leadership opportunities</li> <li>• Consultation measures are regularly evaluated and reviewed</li> <li>• Children and adults at risk are comfortable participating in decision-making and communicating their views and concerns</li> </ul>	<p>Implement “Make your voice heard plan 2021”</p>	<p>SSM DSO</p>	<p>31/7/22</p>
7.3	<p>Club plans, policies and procedures are informed by the views of children and families, including groups who are often excluded i.e. looked after children</p>	<p>Look at fans forum groups, or work with the Trust and academy to look at developing a “Young person friendly “children and young people’s safeguarding/complaints policy.</p>	<p>Academy staff consult with scholars every 2 months. This has been developed as a way of recording issues that young people have raised.</p>	<p>SSM DSO</p>	<p>DONE</p>
7.4	<p>Children and Young people are made aware of their right to be safe from abuse and where to go for help in relation to maltreatment and abuse</p>		<p>CHILD PROTECTION POLICY IN PLACE AND ON WEBSITE IN ACADEMY HANDBOOK</p>	<p>DSO</p>	<p>DONE</p>