

Bloomsbury Football Foundation



Safeguarding Children, Young People and Adults Policy

Contents

Context	4
Statements and Aims	4
Policy Statement	4
Equal Opportunities Statement	5
Policy Aim	6
Safeguarding Personnel	6
Lead and Deputy for Safeguarding	6
Line of accountability for safeguarding	7
Why do we need a Safeguarding Policy?	9
Definitions	10
Definition of a child/young person	10
Definition of an adult at risk	10
Related Policies	10
Data Protection	10
Confidentiality	12
Whistleblowing	12
Information Sharing	14
Safer Recruitment	14
Statement on Disclosure and Barring Service (DBS) Checks	15
Induction and Training	15
Working Practices	16
Consent	16
Staff Ratios to Children, Young People and Adults at Risk	16
Lone and One to One Working	16
BFF does not do Home Visits	17
Player and Parent/Guardian Education	17
Player Education and Support	17
Parent and Guardian Engagement	17
Young People who work in our Organisation	17
Codes of Conduct - BFF follows the FA code of conduct	18
Recognising Abuse in Children Young People and Adults at Risk	18
Handling Disclosures	19
Responding to Disclosures and Concerns	22
Non-Abuse-Related Concerns	24
Mental Health and Wellbeing Concerns	24
Handling Allegations / Dealing with Complaints / Disciplinary & Grievance Procedures	26
Handling Low-Level Concerns	26
Contextual Safeguarding	28
eSafety.....	30

Why do we need to include eSafety?	30
eSafety Code of Conduct:	30
What are the Risks?	30
What else might be of concern?	31
What do I do if I am concerned?	31
Online Safety Referral Flowchart – Child and Adult	32
Minimising the Risks	33
Safeguarding Practical Guidance	33
Photography & Filming Guidance	33
Transport	34
Activities, Events and Visiting Speakers/Activity Leaders	35
The Late Pick Up of a Child, Young Person or Adult at Risk	35
Child, Young Person or Adult goes Missing	36
First Aid	36
Buildings and Venues	37
Ethical fundraising	37
SAFEcic Recommendations	38
Policy Date	38
Policy Review Date: 27/03/2026 Date of next review: 27/03/2027	39

Context

- Bloomsbury football Foundation (“BFF”, “we”, “us”) is a registered charity in England and Wales, 1178842.
- BFF operates in London, UK.
- BFF delivers football sessions to young people.
- BFF works with young people aged 3-18 in programmes which include weekly football sessions (“Communities”), Club Football, refugee/asylum seeker football, blind/visually impaired, and pan-disability (together “Special Projects”), Girls Super League, and Club Futsal. BFF also works with adults in the u18 and senior levels of our Club Football and Club Futsal programmes.
- BFF are regulated by the Charity Commission, the FA, Ofsted.
- BFF have 50 employees and a fluctuating number of contractor coaches, typically around 60.
- BFF engages over 6,000 young people per week.

Statements and Aims

Policy Statement

Bloomsbury Football is committed to safeguarding and promoting the welfare of all children, young people, and adults at risk who engage with our organisation. We recognise that everyone has the right to participate in football in a safe, positive, and enjoyable environment, protected from abuse, neglect, and exploitation. We are committed to ensuring safeguarding practice reflects statutory responsibilities, government guidance and complies with best practice and Working Together to Safeguard Children Act 2023 requirements.

We believe that:

- The welfare of children, young people, and adults at risk is paramount and must always be the primary consideration
- All participants, regardless of age, gender, race, religion, sexual orientation, ability, or background, have equal rights to protection and safeguarding
- Everyone has a responsibility to support the well-being of vulnerable individuals and promote their welfare
- All suspicions, concerns, and allegations of abuse or poor practice will be taken seriously and responded to swiftly and appropriately

Equal Opportunities Statement

We recognise that anyone can become subject to discrimination, harassment or victimisation because of:

- age
- culture
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity,
- race
- religion or belief
- sex
- sexual orientation

Comments and actions that contribute to discrimination, harassment or victimisation are not acceptable and will be challenged. Such incidents will be recorded and shared with parents and carers, and the relevant agencies when necessary and appropriate.

We acknowledge that some children, including deaf and disabled children or those from Black, Asian and minoritised communities, can be particularly vulnerable to abuse and we accept the responsibility to take reasonable and appropriate steps to ensure their welfare. For more information regarding our stance on Equality, Diversity and Inclusion, please see our EDI Policy and Equal Opportunities Policy.

We will:

- ✓ treat everyone with respect and celebrate their achievements,
- ✓ carefully recruit and select all staff whether paid or unpaid,
- ✓ respond to concerns and allegations appropriately.

When there are concerns about the welfare of any, child, young person or adult at risk, all responsible adults in our organisation are expected to share those concerns, without delay, with the Head of Safeguarding (or the on-duty Deputy, if the Head is unavailable).

Our policy is approved by (**Trustees, Head of Safeguarding and CEO**) and will be reviewed and updated annually. We will publish and promote this policy to all staff, employees, sub-contractors and volunteers, through induction, training and supervision. We endeavour to disseminate, as appropriate, this policy to all who come into contact with BFF e.g., children, young people, adults at risk, their parents, carers, families and others, such as organisational partners and fundraisers.

Policy Aim

As members of SAFEcic, we aim at all times to attain best safeguarding practice throughout all our activities with children, young people, adults at risk, their parents, carers and/or families. We endeavour to provide a safe and friendly environment and celebrate all achievements. We will achieve this by adhering strictly to this policy, guidance and risk assessments. Our organisation holds current Public Liability Insurance, Cyber Insurance,

Business Travel Insurance, and FA Club Insurance which covers all our activities.

We will:

- ✓ Create a culture where everyone feels safe, respected, valued, and empowered to raise concerns
- ✓ Ensure all staff, volunteers, coaches, and trustees understand their safeguarding responsibilities through comprehensive training, clear procedures, and regular quality assurance checks
- ✓ Implement robust safer recruitment and vetting procedures for anyone working with vulnerable groups
- ✓ Work in partnership with children, young people, adults at risk, families, and relevant agencies to promote welfare and protection
- ✓ Regularly review and update our safeguarding policies and practices to reflect legislative changes and best practice guidance
- ✓ Respond promptly and appropriately to all safeguarding concerns, working with statutory agencies where necessary, ensuring the victim's wellbeing is held at the highest importance.

Safeguarding Personnel

Lead and Deputies for Safeguarding

NB In educational settings the title Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (DDSL) are used.

Our Lead for Safeguarding is:

Name: Peter Marment

Job role: Head of Safeguarding and Governance
(Designated Safeguarding Lead) Contact details:

p.marment@bloomsburyfootball.com

Tel: +44 7514 724242

Our Deputy Leads for Safeguarding are:

Name: Ricky Dhillon

Job role: Futsal and Football Coach

Contact details: r.dhillon@bloomsburyfootball.com

Name: Sam Masterson

Job role: Men's and Women's Futsal Coach

Contact details: s.masterson@bloomsburyfootball.com

Name: Kez Soornack

Job role: Senior Community Lead and Schools Specialist

Contact details: k.soornack@bloomsburyfootball.com

Name: Annabel Weber

Job role: Communities Lead

Contact details: a.weber@bloomsburyfootball.com

Their role is to oversee and ensure that our safeguarding policy, which includes eSafety, is fully implemented and that we attain SAFEcic standards. Their responsibilities are:

- ✓ monitoring and recording concerns
- ✓ making referrals to social care, or police, as relevant, without delay
- ✓ liaison with other agencies
- ✓ arranging training for all staff

The Deputy Leads for Safeguarding should be available to support or cover for the Lead. They will also handle any complaints or allegations against the Lead for Safeguarding if appropriate. It is important that the Lead and Deputy Leads for Safeguarding are unconnected.

Line of accountability for safeguarding

The responsibility for safeguarding at Board level is shared between members. Safeguarding is on the organisation's risk register and is a standing item on Board agendas. As an Ofsted and Charity Commission regulated organisation, the organisation has to comply with the PREVENT Duty. A Senior Member of the organisation at Board, Trustee, Governor or similar level has been appointed to take strategic responsibility for the organisation's safeguarding arrangements. This person is unconnected to the Lead for Safeguarding and Deputy Leads for Safeguarding and has up to date and relevant training with the ability to develop knowledge, skills and expertise in safeguarding.

Senior Lead for Safeguarding

Our Senior Lead for Safeguarding is:

Name: Ali Durban

Job role: Board Trustee

Contact details: ali.durban@gesherschool.com

Why do we need a Safeguarding Policy?

All organisations that work or come into contact with children, young people and/or adults at risk need to have safeguarding policies and procedures in place.

Government guidance is clear that all organisations working with children, young people, adults at risk, parents, carers and/or families have responsibilities for safeguarding. It is important to remember that children, young people and adults at risk can also abuse and that such incidents fall into the remit of this policy.

To undertake these responsibilities, we:

- have a DSL group of 5 staff alongside a board member who are committed to safeguarding
- are clear about peoples' responsibilities and accountability
- have a culture of listening to children, young people and adults at risk
- undertake safer recruitment practices for all staff and volunteers working with children & young people and adults at risk
- have procedures for safeguarding children and young people and adults at risk
- have procedures for dealing with allegations against, and concerns about, any staff
- make sure staff, paid and unpaid, have mandatory induction and further safeguarding training, supervision, reviews and support
- have agreements about working with other organisations and agencies

Definitions

Definition of a child/young person

There is no single law that defines the age of a child across the UK. The UN Convention on the Rights of the Child, ratified by the UK government in 1991, states that a child "means every human being below the age of eighteen years unless, under the law applicable to the child, majority is attained earlier" (Article 1, Convention on the Rights of the Child, 1989). A child is anyone who has not yet reached their 18th birthday (16th in Scotland).

Definition of an adult at risk

An adult at risk is a person over the age of 18 years and is:

- having needs for care and support, and
- experiencing, or is at risk of, abuse and neglect and
- as a result of those care needs, is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

Related Policies

- Harassment and Bullying Policy
- Intimate Care Policy
- Medicine Management Policy
- Walking Home Policy
- Physical Contact Guidance
- The FA Respect Code of Conduct
- Online Safeguarding Policy and E-Safety Policy
- Taking a child to the toilet process
- Residential Policy
- Filming and Photography Policy
- Extreme Weather Policy
- Food Handling Policy
- Safer Recruitment Policy

To view these policies or access other policies, please view the “Safeguarding” tab on www.bloomsburyfootball.com or contact safeguarding@bloomsburyfootball.com to request a copy.

Data Protection

We will treat any personal information by which an individual can be identified, for example, name, address, and email, in accordance with the provisions of Data Protection Act 2018 (DPA 2018), and the UK General Data Protection Regulation (UK GDPR) and will not share information with any third party, except where required by law. For more information, please refer to our GDPR Policy and Privacy Notice located on our website.

Confidentiality

This policy is in line with government guidance about confidentiality and these details will be made available to all staff, children, young children, adults at risk, parents and carers.

We fully endorse the principal of the welfare of children, young people and adults at risk, overriding any obligations of confidence we may hold to others. No one working, or involved, with our organisation can promise absolute confidentiality. Individual cases will only be shared or discussed on a “need to know” basis.

Whistleblowing

Whistleblowing is when someone raises a concern externally about a person or practice within the organisation, which will affect others in an illegal and or harmful way.

Our organisation promotes the sharing of any concerns regarding the safeguarding of children, young people and adults at risk as soon as possible with the Lead or Deputy for Safeguarding.

If individuals reporting their concerns within our organisation do not feel they have been acted upon then we support their right to report these concerns to the Local Authority

Designated Office (LADO) (England and Wales only) social care services, the police, and / Ofsted & the Charity Commission.

[Bloomsbury Football Foundation's Whistleblowing Policy](#)

Ofsted complaints form:

<https://complain.ofsted.gov.uk/>

Telephone: 0300 123 1231.

Email: whistleblowing@ofsted.gov.uk

DfE complaints form:

[https://form.education.gov.uk/service/Contact the Department for Education#](https://form.education.gov.uk/service/Contact_the_Department_for_Education#)

Charity Commission

<https://www.gov.uk/guidance/report-serious-wrongdoing-at-a-charity-as-a-worker-or-volunteer>

Email: whistleblowing@charitycommission.gov.uk

Individuals can also request support from the charity **Protect**:

<https://protect-advice.org.uk/>

or the **NSPCC**:

Telephone: 0800 136 663

Email: help@NSPCC.org.uk.

Specifically, Footballers who have been sexually abused can call the NSPCC on 0800 023 2642.

Information Sharing

Timely and accurate written records play an essential role in safeguarding individuals, who may have suffered, are suffering or at significant risk of suffering harm. It is important that records are shared at the appropriate time when necessary. Within our organisation the decision to share written information, and with whom, will be undertaken by the Lead or the Deputy Leads for safeguarding

Safer Recruitment

Our organisation is committed to safe recruitment in line with the relevant legislation and guidance from government, Ofsted and the Charity Commission for recruiting all staff, paid or unpaid. We do this by:

- advertising vacancies with a clear commitment required to safeguarding
- assigning all posts detailed job descriptions
- obtaining full personal details via an application form (not CVs) with particular relevance to previous work with children, young people and adults at risk
- when a candidate is selected for interview the relevant criminal declaration form will be sent for completion as set out by the Rehabilitation of Offenders Act 1974, as amended
- always taking up two written references, one from the most recent employer or education establishment
- undertaking all interviews face to face, based on the job description
- ensuring at least one person on each interview panel will have undertaken Safer Recruitment training, in line with **Ofsted**, **DfE** and Charity Commission safe recruitment guidelines.
- having sound procedures and recording for interviewing to ensure we are satisfied, and can evidence that the applicant is appropriate and suitable

Any appointment will only be confirmed subject to:

- ✓ a satisfactory ID and criminal records check at the appropriate level, including Certificate of Good Conduct for foreign nationals and the [International Child Protection Certificate \(ICPC\)](#) for anyone who has lived in the UK and also travelled overseas
- ✓ a follow up of written references by telephone if relevant to the vacant post
- ✓ a check of essential qualifications
- ✓ confirmation of the Right to Work in the UK for employed personnel
- ✓ fitness to work as relevant

Statement on Disclosure and Barring Service (DBS) Checks

Bloomsbury Football Foundation's policy is to provide a secure and safe environment for all

children by requiring all staff members to have an enhanced, up to date clearance from the Disclosure and Barring Service (DBS), which does not have any information declared on it that indicates this person is a threat to children. Enhanced DBS checks are renewed every three years. In the event volunteers providing a temporary service and have not received a DBS check, BFF will undergo a risk assessment for their involvement, they will be required to read and agree to this Safeguarding Policy, and they will be supervised at all times.

Induction and Training

We have a clear induction and training strategy with clear job descriptions and responsibilities and all relevant procedures. All new staff, paid and unpaid, will receive an in-person induction training as soon as possible and sign to record they have:

- received and understood this policy.
- been given any relevant resources
- understood the commitment to safeguarding training

Following induction, staff working directly with children must complete and pass a safeguarding quiz (with a score of 42/60 or higher) and will receive 6 annual safeguarding trainings per year. We also agree a probationary period of **3** months with clear goals and then provide **appraisals** at regular intervals of **6** months **with the relevant line manager**.

Updated safeguarding training is normally required every 2 years (online) or three years (face to face).

Staff working directly with at risk groups will also undertake the free online government training for [PREVENT Channel](#) and [FGM](#)

Trustee Safeguarding Training

Bloomsbury Football recognises that our trustees have a legal and moral duty to ensure the organisation provides a safe environment for all participants.

All trustees are required to complete NSPCC trustee safeguarding training to ensure they understand their safeguarding responsibilities and can provide effective governance and oversight of our safeguarding practices. Trustees will also be provided with Charity Commission safeguarding educational materials to support their understanding of charity sector best practice and regulatory requirements.

Our Board of Trustees will maintain ongoing oversight of safeguarding matters, regularly reviewing policies, procedures, and incidents to ensure continuous improvement and accountability in our safeguarding standards.

Working Practices

Consent

When consent is required for any care, activity or intervention we will, unless it is an emergency, obtain consent from the **parent/carer or relative for a child, young person or an adult at risk.**

Where relevant, we will ensure we fulfil our obligations under Child Care Law in terms of parental responsibility and Mental Capacity Legislation on supporting, where possible, the individual's right to make their own decisions. Any decisions made should be the least restrictive and recorded.

Staff Ratios to Children, Young People and Adults at Risk

BFF will comply with NSPCC-recommended ratios and ensure we have carried out risk assessments for any instances where we cannot comply fully with this. BFF's policy is to operate with a minimum of 2 coaches and the following ratios for different age groups:

- 3- to 6-year-old: 1:6,
- 7- to 9-year-olds 1:8,
- 10- to 12-year-olds 1:12,
- 13+ year olds 1:15.
- For School Sessions, the ratio is 1:15 with a minimum of two staff members.

If a BFF coach is at a School Session where the ratio exceeds 1:15 and is in a lone working situation, the school must provide a member of staff for the session. If this occurs multiple times, the school must arrange for another coach to be allocated to the session. If the school cannot provide an additional member of staff, the BFF coach let the school know they cannot take the session as per our safeguarding policy and the SLA in place.

<https://learning.nspcc.org.uk/research-resources/briefings/recommended-adult-child-ratios-working-with-children#article-top>

Lone and One to One Working

We will avoid lone working, one to one working with children and adults at risk whenever possible to protect both individuals. A risk assessment will always be undertaken to ensure:

- ✓ the care or activity provided is suitable for one to one working,
- ✓ the lone worker has been sent the lone working risk assessment,
- ✓ the lone worker has been recruited, trained and supervise to undertake this particular role,
- ✓ that health and safety issues have been identified and recommendations followed,

- ✓ safeguards are in place to protect individual's rights to safe working practice,
- ✓ safeguards are in place in relation to strategies for emergency situations,
- ✓ relevant business insurance is in place for use of personal vehicles
- ✓ accurate and relevant written recording is maintained following any care and activity, signed and dated.

BFF does not do Home Visits

Player and Parent/Guardian Education

Bloomsbury Football recognises that effective safeguarding requires the active participation and awareness of all members of our football community.

Player Education and Support

We will ensure that all players understand their right to feel safe, supported, and heard. Players will be educated on how to speak to coaches, designated safeguarding officers, or other trusted adults about any wellbeing concerns, whether related to football activities or their wider lives. We will create regular opportunities for open dialogue and ensure that age-appropriate safeguarding education is integrated into our coaching sessions, helping players recognise concerning behaviour and know where to seek help.

Parent and Guardian Engagement

We will provide parents and carers with regular safeguarding information and education through our newsletters, website, and direct communications. This educational material will cover important topics including recognising signs of abuse, online safety, mental health awareness, and promoting positive wellbeing. Parents and carers will be provided with clear referral pathways, contact information for our designated safeguarding officers, and details of relevant external support services and agencies that can provide specialist assistance when needed.

Young People who work in our Organisation

All young people who are undertaking volunteer work, apprenticeships or work experience within our organisation/group are to be included within this policy and their safeguarding as individuals given the same importance as all young people we come into contact with. Any disclosures, observations of possible harm or disturbing behaviour must be reported to the Lead or Deputies immediately.

They will also require an induction program that includes their commitment to safeguarding within the remit of the safeguarding policy and in line with all staff induction.

In addition, information on the young person's contacts recorded as relevant e.g. parents, carers, school representatives and any supervisors, with emergency contact numbers.

We will check with the relevant local authority's education welfare team to see if an employment permit is required for any young people working with us and, in the cases of live performances, if a child performance licence is required.

Codes of Conduct - BFF follows the FA code of conduct

We aim to provide a safe environment free from discrimination, upholding and promoting

equality, diversity and inclusion. We undertake to:

- ✓ treat all children and young people and adults at risk with respect and dignity
- ✓ ensure that their welfare and safety is paramount at all times
- ✓ maintain professional boundaries both face to face and when using technology
- ✓ ensure any intimate touch required, to carry out care, treatment or training is within relevant NSPCC guidelines and is safe and appropriate. Intimate touch and care will always be part of a plan, agreed with the individual concerned, their parents or carers.
- ✓ always listen to individuals and take account of their wishes and feeling
- ✓ always act in a professional way and not accept bullying, swearing or other disruptive behaviour
- ✓ liaise openly with parents and carers
- ✓ only use physical contact if absolutely necessary
- ✓ avoid being alone with children, young people and adults at risk whenever possible
- ✓ listen to, and act upon, any disclosures, allegations, or concerns of abuse
- ✓ participate in approved safeguarding training at appropriate levels
- ✓ ensure restraint is only used as part of an agreed plan by staff trained in the use of the particular restraint or as an emergency action to protect from harm. All use of restraint will be reported and recorded by the member of staff concerned to the Lead or Deputies for safeguarding and to the relevant manager.
- ✓ follow our safeguarding policy at all times
- ✓ make activities fun and enjoyable

[**Bloomsbury Football Employee Handbook**](#)

[**Bloomsbury Football Parents and Carer's Code of Conduct**](#)

[**Bloomsbury Football Player's Code of Conduct**](#)

NSPCC intimate touch guidelines: [Intimate care of children | NSPCC Learning](#)

FA code of conduct: [respect-codes-of-conduct_fillable.pdf](#)

FA physical touch policy: [5-6-physical-contact-young-people-guidance-grassroots-football-black-and-white-version.pdf](#)

Recognising Abuse in Children Young People and Adults at Risk

The following list is for guidance only and is not exhaustive. All the following, and their warning signs must be reported the DSL or, if necessary, emergency services as soon as possible. It is important to be observant, listen to what is being said and record. e.g. is what you are observing and being told about an injury consistent with the injury?

- Abuse related to faith or belief
- Alcohol and Substance misuse

- AI-Generated Child Sexual Abuse
- Breast Ironing
- Carrying offensive weapons
- Child criminal and sexual exploitation including County Lines
- Child on child abuse, including sexual violence and upskirting
- Concealed pregnancy
- Criminal exploitation
- Discriminatory
- Domestic violence, including "honour" based abuse
- Emotional
- Exploitative use of technology
- Female Genital Mutilation (FGM)
- Financial or material abuse
- Forced marriage
- Gangs
- Gambling
- Hate and "mate" crime
- Hazing and initiation rites
- Hoarding
- Modern slavery
- Neglect and acts of omission
- Online safety
- Organisational or institutional
- Psychological
- Physical
- Radicalisation
- Self-neglect
- Sexual trafficking

Handling Disclosures

When a disclosure is made by a child, young person or adult at risk it is important to remember to:

- take what you are being told seriously
- stay calm and reassure
- do not investigate
- do not delay and always

- seek advice from the Lead or Deputies for Safeguarding
- make a careful recording of anything you are told or observe, date and sign.

A disclosure may come from someone telling you:

- they have or are being abused
- they have concerns about someone else
- they are themselves abusing or likely to abuse someone else.

If the situation is **urgent**, defined as where the child's mental or physical health is at significant risk of harm or has sustained significant harm, call 999 immediately.



How to Report a Safeguarding Incident

- 1) If the incident is urgent, please call 999 immediately and, if necessary, deal with the situation using your first aid training.
- 2) If the situation is not urgent and no longer requires your attention, call the DSL Hotline **(+44 7700 174021)** or (if you cannot call) email safeguarding@bloomsburyfootball.com
- 3) If requested by the DSL, complete an incident report at the end of the session/day.
- 4) The incident will then be filed and dealt with accordingly. You may still be asked for further information.

ON-DUTY DSL'S ARE ON CALL 8am-10pm

**DSL HOTLINE:
+44 7700 174021**

DSL TEAM



**Peter
Marmont
(mon-fri)**



**Kez
Soornack**



**Ricky
Dhillon
(sun)**



**Annabel
Weber**



**Sam
Masterson
(sat)**

Responding to Disclosures and Concerns

Safeguarding Referral Flowchart

We ensure and emphasise that everyone in our organisation understand and know how to share any concerns immediately with the Lead or Deputy for Safeguarding. Everyone, including the Lead and Deputy for Safeguarding, will deal with concerns using the following flowchart:

STEP 1 A concern arises — recognise the trigger

You are worried a child, young person or adult at risk has been abused because:

- you have seen something
- someone says they have been abused
- somebody else has told you they are concerned
- there has been an allegation against a colleague
- there has been an anonymous allegation
- an adult has disclosed that they were abused as a child
- a child, young person or adult says they are abusing someone else

STEP 2 Consult, monitor and record

Check this safeguarding policy for guidance. Talk to the DSL without delay — via Teams, in person, or the DSL hotline.

If the DSL is implicated:

- Contact the CEO

If both DSL and CEO are implicated:

- Contact the Board Safeguarding Representative

At all times — sign, date and record your concern including name and job role.

□ When the concern is about the welfare of a child or adult at risk from schools, colleges, health providers, GP practices, prisons or social care settings — refer to that organisation's Lead for Safeguarding in the first instance. Then inform the Lead or Deputy of your own organisation that you have made a referral.

STEP 3 Refer to statutory agencies

The Lead, Deputies or Additional Senior Lead should refer the concern to the relevant adult's or children's social care service and/or the Police and follow up in writing within 24 hours.

If the concern involves FA-regulated activity:

- Contact the County FA's Designated Safeguarding Officer

For England and Wales — allegations against a person in a position of trust:

- The Local Authority Designated Officer (LADO) will co-ordinate next procedural steps

For England and Wales — safeguarding concerns about significant risks to a child's wellbeing:

- Police, for urgent situations, or social care services/MASH (the multi-agency safeguarding hub for the borough of the child's residence)

Under whistleblowing, anyone can refer directly to:

- Police, social care services, LADO, the Charity Commission, Protect or the NSPCC (child concerns only)

**Any consultation should not delay a referral.
In an emergency — do not delay, call 999**

Non-Abuse-Related Concerns

We recognise that our duty to safeguarding the mental and physical wellbeing of the children, young people, and adults at risk in our care is not limited to prevention and response to abuse. Bloomsbury Football staff have a duty to be aware of other threats to physical and mental wellbeing along with the warning signs associated with these threats and how to respond, understanding of their duty to report. These threats include, but are not limited to:

- venue-related concerns such as...
 - hazards on or around the pitch
 - lines of sight into toilets or dressing rooms
 - shared dressing room space with adults
 - unsecure access points
- mental health and wellbeing concerns
- legal concerns such as restraining orders against parents
- poor practice from Bloomsbury Staff, parents, or other professionals

Mental Health and Wellbeing Concerns

Bloomsbury Football recognises that mental health is as important as physical health and that participation in sport can play a vital role in promoting positive wellbeing. We are committed to creating a supportive environment where mental health concerns are recognised, taken seriously, and addressed appropriately.

Recognising Warning Signs:

Our staff, volunteers, and coaches will be alert to potential warning signs of mental health difficulties, which may include:

- Significant changes in behaviour, mood, or performance
- Social withdrawal or isolation from peers
- Persistent low mood, anxiety, or emotional distress
- Changes in eating or sleeping patterns
- Self-harm or expressions of suicidal thoughts
- Excessive worry or fear about attending activities
- Sudden decline in academic or sporting performance

Responding to Concerns:

When Bloomsbury Staff identify mental health concerns, they should:

- Approach the individual with compassion and without judgment
- Listen actively and take their concerns seriously
- Reassure them that support is available
- Report the concern to our designated safeguarding officer
- Maintain appropriate confidentiality while ensuring the individual's safety

Referral Pathways:

For non-urgent mental health concerns, we will:

- Speak with parents/carers to share observations and concerns
- Signpost families to appropriate support services including GP services, school pastoral support, and local mental health services
- Provide information about organisations such as YoungMinds, Kooth, Mind, Childline, and local CAMHS (Child and Adolescent Mental Health Services)

Mental Health Crisis Situations:

If an individual is in immediate danger or crisis (including expressing suicidal thoughts, engaging in self-harm, or experiencing acute psychological distress), we will:

- Ensure the person is not left alone
- Contact emergency services (999) if there is immediate risk to life
- Contact parents/carers immediately (unless doing so would place the individual at greater risk)
- Contact our designated safeguarding officer
- Follow up to ensure appropriate support has been accessed

We will ensure that contact information for crisis support services (including Samaritans 116 123, SHOUT text service 85258, and local crisis teams) is readily available to staff, participants, and families.

Record Keeping

At all times when required, and especially where there is a safeguarding concern, we are committed to keeping records which are:

- recorded on a safeguarding incident form stored on CPOMS
- of sufficient details of child, young person or adult at risk to identify individual who is subject of concern and any significant others
- accurate and factual/based on fact, as a true record of:
 - what has been monitored/observed
 - what has been said and by whom
 - what has given cause for concern
 - what action has and/or will be taken including the reason for those actions
 - the reason stated for no action being taken and by whom
- non judgmental
- timely within 24 hours
- signed and dated by the writer and co- signed by the Lead or Deputy
- shared as appropriate by the Lead or Deputy for Safeguarding
- stored safely and securely by the Lead or Deputies for Safeguarding on CPOMS

Handling Allegations / Dealing with Complaints / Disciplinary & Grievance Procedures

Our policies and procedures are in line with the statutory guidance, guidelines, and our disciplinary, complaints and grievance procedures. These will be made available to everyone.

Where a complaint or allegation has been made with regards to any inappropriate behaviour or poor practice, the Lead or Deputies will, in all cases, discuss the situation with social care services (the LADO with regards to children England and Wales only) and / or the police before making an open decision about the best way forward. If the allegation occurs in the context of activities which fall under the FA's jurisdiction, a referral will also be made to the County FA's Designated Safeguarding Officer.

In the case where the Lead is implicated, the CEO should be informed. In the exceptional circumstances that both are involved, the person concerned will inform the Senior Lead. If there is a belief that the concern has not been taken seriously or acted upon then any one can "Whistleblow" by following [Bloomsbury Football's Whistleblowing Policy](#).

With regards to disciplinary and grievance procedures, we will take no steps until we have fully discussed and agreed a strategy with social care services and/or the police, (the LADO, with regards to children England and Wales only). Any investigation will override the need to implement any such procedures. Our management are responsible for:

Reporting serious incidents to the Charity Commission (<https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity>)

And/or Ofsted (<https://www.gov.uk/guidance/report-a-serious-childcare-incident>)

And reporting individual personnel to the DBS and, if a registered FA coach, to the FA when requested by the LADO.

Handling Low-Level Concerns

Bloomsbury Football is committed to creating an environment where all concerns about the behaviour of adults towards children and vulnerable individuals are shared and addressed promptly, no matter how small they may seem.

A low-level concern is any concern, no matter how minor, that a member of Bloomsbury Football's Staff working with children may have acted in a way that:

- Is inconsistent with our code of conduct or safeguarding policies

- Does not meet the threshold for referral to statutory agencies
- Can be considered poor practice
- May seem insignificant but feels "not quite right" or causes a sense of unease

Examples may include but are not limited to:

- Being over-friendly with children
- Having direct contact with children over the internet or messaging platforms
- Having favourites
- Taking photographs on a personal device
- Engaging in one-to-one contact outside of organised activities without proper protocols
- Using inappropriate language or making comments that could be misinterpreted
- Minor breaches of our code of conduct
- Singling-out or conduct that could be considered as bullying

Our Approach:

We encourage all staff, volunteers, coaches, and parents to share low-level concerns with our designated safeguarding officers. All concerns will be:

- Recorded in writing and stored securely on CPOMS
- Investigated further, potentially involving the submission of statements from key individuals or the investigation of Bloomsbury Football-provided devices
- Reviewed to identify any patterns of behaviour that may indicate a more serious safeguarding risk
- Addressed through proportionate and appropriate action, which may include additional training, mentoring, or closer supervision
- Handled in a fair and transparent manner that respects the rights of all individuals involved, involving the disciplinary processes at Bloomsbury Football, if necessary.

Bullying and Harassment

Bullying and harassment can take many forms and include:

- physical violence including threats, verbal assaults and taunts, the destruction of property, extortion, unwanted sexual interest or contact
- indirect forms of bullying including ignoring a person and the withdrawal of friendship, malicious gossip and spreading rumours, abusive or oppressive graffiti, the use of social media, electronic messages and websites.
- it is often motivated by prejudice against certain groups for example on the

grounds of race, religion, gender and disability

Whether directed at children, young people, adults at risk, staff, volunteers, parent and carers, bullying and harassment, physical and/or emotional abuse will not be tolerated. All such behaviour will be treated as a safeguarding concern when aimed at children, young people and or adults at risk. If children, young people and/or adults at risk are engaging in bullying or harassment it is also a safeguarding concern and should be reported to the Lead or Deputies for safeguarding. For more information, please refer to our Harassment and Bullying Policy.

We will:

- provide a culture of equality and respect for all with zero tolerance to any form of bullying or harassment
- report all incidents of bullying or harassment observed or disclosed, to the Lead or Deputies who will take the appropriate action
- take immediate steps to stop the behaviour and mitigate the effects of bullying and harassment
- record all incidents with observations and witness statements, and action taken, signed, timed and dated on CPOMS.

Contextual Safeguarding

Bloomsbury Football recognises that safeguarding concerns can arise from contexts beyond individual harm and that different groups face unique vulnerabilities and challenges. We are committed to understanding and responding to the specific safeguarding needs of all our participants through contextual and trauma-informed approaches.

Specialist Session Provision:

We deliver tailored football sessions for specific groups including all-girl sessions, refugee and asylum seeker sessions, blind and visually impaired sessions, and pan-disability sessions. Each of these sessions requires heightened awareness of context-specific safeguarding considerations.

Partnership Working:

We recognise that we cannot work in isolation to effectively safeguard all our participants. We actively partner with specialist organisations who have expertise in supporting refugees and asylum seekers, disabled people, blind and visually impaired individuals, and women and girls. These partnerships enable us to:

- Co-design sessions that are safe, accessible, and responsive to specific needs
- Access specialist training and guidance for our coaches and volunteers
- Benefit from the expertise of organisations with deep understanding of the communities we serve
- Create robust referral pathways to specialist support services when safeguarding concerns arise

- Continuously improve our practice through shared learning and evaluation

Enhanced Safeguarding Measures:

Our coaches receive specialist training, often delivered in partnership with expert organisations, to understand and respond to safeguarding concerns that may be more prevalent within specific communities, including:

- Gender-based violence, harassment, and harmful practices (including FGM, forced marriage, and honour-based abuse) in all-girl sessions
- Trafficking, exploitation, discrimination, and integration challenges for refugee and asylum seeker participants
- Increased vulnerability to abuse, isolation, and accessibility barriers for blind, visually impaired, and disabled participants
- Mental health concerns, trauma responses, and communication differences across all groups

Trauma-Informed Practice:

We adopt trauma-informed approaches across all our specialist sessions, recognising that many participants may have experienced significant adversity. We strive to:

- Create predictable, safe, and welcoming environments
- Recognise trauma responses and adapt their coaching accordingly
- Avoid re-traumatisation through sensitive communication and practice design
- Build trust gradually and respect personal boundaries
- Understand that behaviour may be a response to past experiences

Refugee and Asylum Seeker Sessions:

For participants from refugee and asylum seeker backgrounds, we implement additional safeguarding protocols including adherence to our Age Disclosure Policy, which recognises the complexities around age assessment and documentation for this vulnerable group. We work sensitively with participants and families where official documentation may be limited or unavailable, prioritising safeguarding and inclusion. We aim to develop proactive, trusting relationships with care workers and councils to encourage support and information sharing.

Photo Consent and Privacy:

We take extra care regarding photography and media consent for vulnerable groups, understanding that some participants may face heightened risks if their image or participation is shared publicly. We:

- Obtain explicit, informed consent before photographing participants in specialist sessions
- Respect requests for anonymity or restrictions on image sharing
- Store consent records securely and review them regularly
- Ensure participants and families understand how images will be used

Lived Experience and Co-Production:

We recognise that those with lived experience of the challenges faced by our participant groups are often best placed to identify risks and create safe spaces. Where possible, we:

- Recruit coaches who share lived experiences with our participant groups
- Involve participants and families in shaping our safeguarding approaches
- Create feedback mechanisms that allow participants to voice concerns and

suggestions

- Value and integrate the insights of those with direct experience of disability, migration, visual impairment, and gender-specific challenges

By taking a contextual approach to safeguarding and working collaboratively with specialist partners, we ensure that our practices are responsive, appropriate, and effective for all members of our diverse football community.

eSafety

Why do we need to include eSafety?

Modern digital technology has made access to information and communication increasingly easy for everyone. This is especially so for those who cannot always go out to socialise and rely on websites for social networking, watching films, downloading music, buying lottery tickets, shopping etc. Government guidance is clear, that all organisations working with children, young people adults at risk, families, parents and carers have responsibilities. It is also important to remember, children, young people and adults at risk can also abuse and such incidents fall into the remit of this policy

eSafety Code of Conduct:

We expect everyone in our organisation to agree to our eSafety and Online Safeguarding policies to:

1. use the internet and other forms of communication in a sensible and polite way.
2. only access websites, send messages or access and use other resources that will not hurt or upset anybody.
3. seek written permission if they want to use personal information or take photographs of other people.
4. report any concerns to the Lead or Deputies
5. not maintain confidentiality if there is a concern about the welfare of a child, young person or adult at risk.

What are the Risks?

There are many potential risks including:

- accessing inappropriate or illegal websites.
- receiving unwanted or upsetting texts, e-mail messages or images.
- being “groomed” by another with a view to meeting the child, young person or adult at risk for their own illegal purposes including sex, drugs or crime.
- sharing nudes or semi nudes.
- viewing or sending unacceptable material such as inciting hatred or violence.
- sending bullying messages or posting malicious details about others.
- ignoring copyright law by downloading e.g. music, videos, homework cheat materials etc.

- overspending on shopping and gambling sites.
- being at risk of identity fraud for money transactions.
- inappropriate relationships or prostitution.

What else might be of concern?

A child, young person or adult at risk who:

- is becoming secretive about where they are going to or who they are meeting.
- will not let you see what they are accessing online.
- is using a webcam in a closed area, away from other people.
- is accessing the web or using a mobile for long periods and at all hours.
- clears the computer history every time they use it.
- receives unexpected money or gifts from people you don't know.
- does not appear to have the money they should have.

A person who:

- befriends a child, young person or adult at risk on the internet or by text messaging.
- has links to children, young people and/or adults at risk on their social media pages especially if they work in a position of care such as a sports coach or care worker.
- is secretive about what they are doing and who they are meeting.

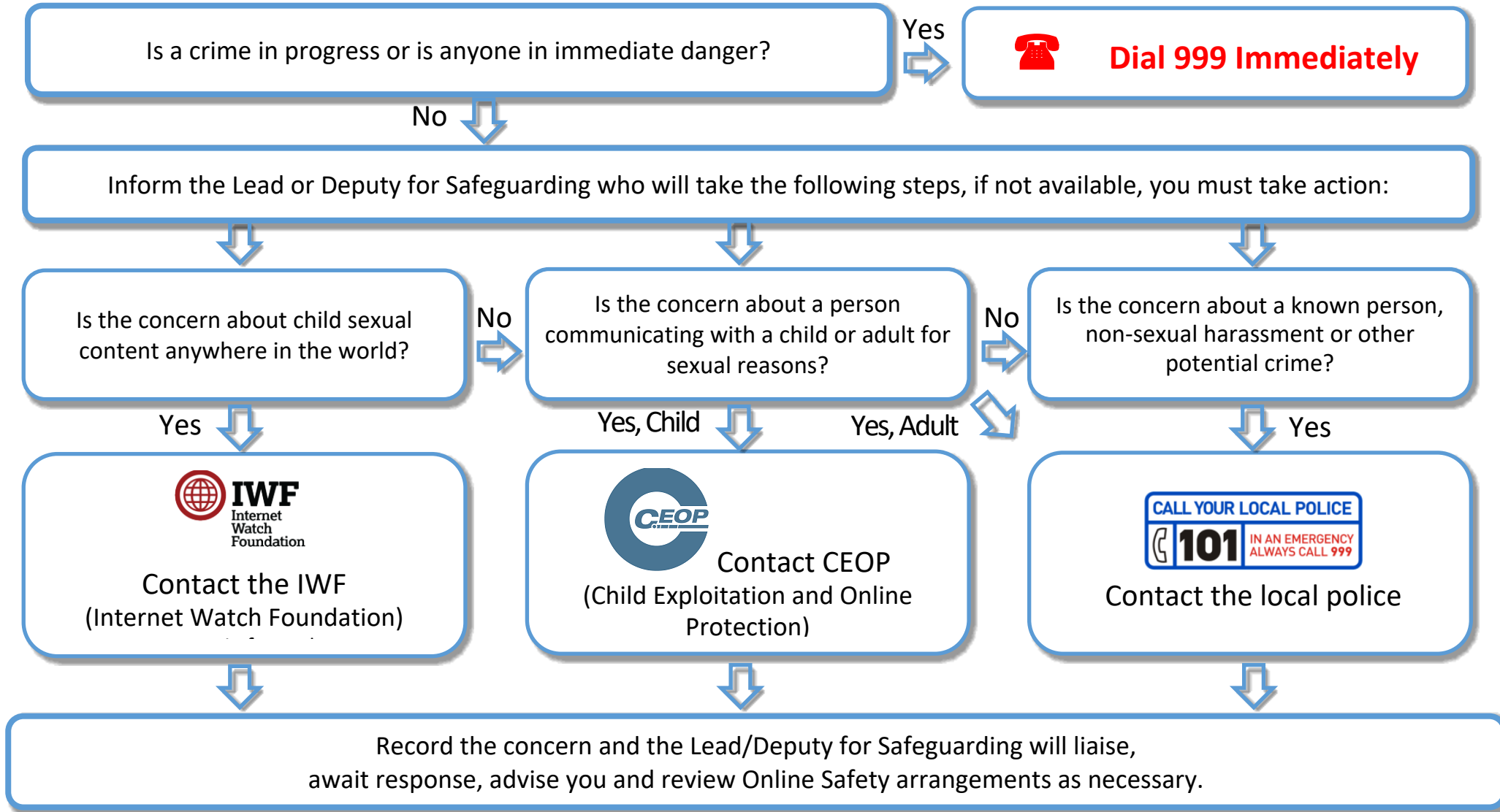
What do I do if I am concerned?

If you have any concerns, speak to the Lead or Deputy for Safeguarding.

Remember:

- do not delay.
- do not investigate.
- seek advice from the Lead or Deputies
- make careful recording of anything you observe or are told

Online Safety Referral Flowchart – Child and Adult



Minimising the Risks

We will:

- talk to children, young people and adults at risk about what they are accessing online.
- Only allow participants to use the internet for essential purposes with permission from staff and in sight of staff.
- explain the risks of giving out personal details online.
- talk about how people can be anyone they want to be online, e.g. by using misleading emails, photographs of other people, telling lies about their age, hobbies, school.
- encourage children, young people and adults at risk to think carefully about what photographs or videos they use online. They can be used and tampered with by other people, or they may not be appropriate.
- advise children, young people and adults at risk to only text, chat or webcam to people they know in real life.
- talk about how to identify SPAM messages or junk mail and how to delete them. This also applies to messages from people they do not know, or opening attachments.
- discuss how people hide their identities online and the importance of never meeting new online “friends” in real life.
- make sure children, young people and adults at risk understand they can always talk to us, or their parents and/or carers, about anything that makes them feel uncomfortable.
- look on the internet together for information about how to deal with or report problems. e.g. [Thinkuknow](#)
- talk about how/when information or images get on to the internet, they can never be erased.

Safeguarding Practical Guidance

Photography & Filming Guidance

Both still and moving images are key to recording the successes and achievements of children, young people and adults at risk in their lives and activities. However, it is vital to remember that images (especially digital images) can be used, shared, stored and/or distributed inappropriately, and that their storage and use must comply with the UK GDPR.

It is therefore important to be clear about:

- obtaining written permission from a child's, young person's or adult at risk's legal guardian prior to capturing or posting an image containing said individual with an explanation of how it is being used.
- explaining to parents and carers why caution is necessary
- the purpose of images e.g. parent's and carer's own record, media and publicity etc
- the content required when using a professional photographer
- informing parents and acquiring their consent for any publication or media use
- publishing only necessary identifying details alongside individual's photos in newspapers, websites etc
- taking photographs openly and away from sensitive areas (changing rooms, toilets, etc)
- the suitability of clothing e.g. swimsuits
- any group photos being taken only during the activity or on the premises
- all those taking photos signing a registration form, which also identifies the purpose and use of any images
- ensuring secure storage of all images
- identifying how long unused images will be retained
- identifying how long copies of published images will be retained

The above guidance applies to all still and moving images, however they are created (mobile phone, still camera, video camera etc). The type of equipment and the equipment's owner should also be recorded on the registration form. During the registration process, we request image consent for our use in line with our Privacy Notice, those who do not consent will not have images published of the individual they are registering. Further information on how images of members are used can be found in the Privacy Notice on our website along with further guidance for parents, guardians and coaches on our Filming and Photography Policy.

Transport

We ensure that we:

- gain written permission from parents or carers to carry children, young people and adults at risk
- keep a register of who is being transported and who is driving, when to where and return, with collection and return times being specified
- provide all transporting and being transported with an emergency contact numbers
- plan journeys regarding time, distance and stopping points
- consider if another driver might be required or the possible need for extra supervision

- have emergency

procedures in place and we

ensure that drivers:

- are recruited under safeguarding recruitment procedures
- are suitably qualified to drive the required vehicle
- provide proof of insurance regarding business use and comprehensive insurance
- can evidence the vehicle is roadworthy and suitable for transporting each individual
- provide suitable and age-appropriate seat belts, booster seats and wheelchair anchor points
- avoid transporting children, young people or adults at risk on their own

Activities, Events and Visiting Speakers/Activity Leaders

We will always ensure visitors and activities undertaken are risk assessed, and we are committed to:

- ensuring that those who run activities have the expertise, knowledge and skills to do so properly
- completing a risk assessment which involves identifying risks and the means of reducing or eliminating those risks for all activities or events
- risk assessing any changes being made to activities or events involving children, young people and adults at risk
- having a written plan in place if the event or activity has to be cancelled
- having a written plan in place in case of emergency including contact numbers
- implementing the required actions identified by the risk assessment process and reviewing the effectiveness of these on a regular basis

The Late Pick Up of a Child, Young Person or Adult at Risk

If attempts to contact the parent and nominated emergency contact fail, then the supervising adult should wait with the child, young person or adult at risk with other staff, volunteers or parents wherever possible.

Staff, paid and unpaid, must avoid:

- taking the child, young person or adult at risk home or to another location
- waiting alone with the child, young person or adult at risk in a vehicle or at the venue
- sending the child young person or adult at risk home with another person, without parental consent
- leaving the child young person or adult at risk alone.

If all attempts to make contact fail, contact the police on the non-emergency line (101) for advice.

For more information, please refer to the Walking Home Policy.

Child, Young Person or Adult goes Missing

If a child, young person or adult at risk goes missing from the group or organisation it should be reported to the police. Use 999 where there is a concern that they cannot be found or are vulnerable.

A missing person may be assessed as 'at risk' if they fit one or more of the following categories.

- is under 16
- has expressed feelings of suicide
- has dementia
- has been acting totally out of character
- has mental health issues
- is under increased stress
- has an illness or a physical disability
- has a learning disability
- is in need of regular medication/care

The Lead or Deputy for Safeguarding should be informed as soon as possible, and all details and actions recorded dated timed and signed.

First Aid

All of our coaches have completed specific training as set out by the Health and Safety Executive (HSE). They hold valid and up to date certificates of competence issued by an organisation whose training and qualifications are approved by the HSE.

The duties of a First Aider are:

- to give immediate first aid to children, young people, adults at risk, staff or visitors when needed
- to ensure that an ambulance or other professional medical help is called when necessary

Our organisation undertakes to ensure there is always a trained First Aider on site at our venues or, if other venues used such as schools, that they have appropriate first aid cover. Further, when coaching sessions with children 8 and under, we will have a minimum of one paediatric first-aid qualified staff member present.

We also provide training and guidance on dealing with hazardous materials such as blood, other bodily fluids and chemicals. We ensure sufficient equipment is available to deal with accidents or spillage.

All incidents will be reported and recorded in the First Aid and Incident Accident Books

Buildings and Venues

Safeguarding risk assessments will be carried out on all building and venues used by our organisation or by the host's venue management, such as schools

The safeguarding risk assessment should cover:

- access especially how people enter and leave the building
- signing in protocol
- defibrillator location
- use of keys
- toilets and changing rooms
- any outside space
- car parks
- any other relevant issues

Ethical fundraising

We are committed to our fundraising being:

- **Legal:** All fundraising must meet the requirements of the law.
- **Open:** Fundraisers must be open with the public about their processes and must be willing to explain (where appropriate) if they are asked for more information.
- **Honest:** Fundraisers must act with integrity and must not mislead the public about the cause they are fundraising for or the way a donation will be used.
- **Respectful:** Fundraisers must demonstrate respect whenever they have contact with any member of the public.

For more information regarding our ethical fundraising stance, please see our Ethical Fundraising Policy.

SAFEcic Recommendations

In order to attain the highest standards of safeguarding practice, everybody needs to be vigilant in adhering to this policy and also assessing the risks of their own work and activities. These risk assessments will be carried out annually by the Lead and/or Deputies. However, it is the responsibility of everyone to draw attention to practices and procedures that they are unhappy or uncomfortable with.

It is only through adopting SAFEcic policies and practices that we can all be confident we have done everything we can to safeguard the children, young people and adults at risk in our care.

Policy Date

This policy was agreed and disseminated on 21st February 2023 and will be reviewed annually or when there are substantial organisational changes.

Policy Review Date: 27/03/2026

Date of next review: 27/03/2027



Peter Marment (Mar 30, 2026, 4:36pm)

30 Mar 2026

Peter Marment

Head of Safeguarding and Governance



Ali Durban (Apr 2, 2026, 9:54am)

02 Apr 2026

Ali Durban

Trustee, Senior Lead for Safeguarding



Charlie Hyman (Apr 3, 2026, 3:33pm)

03 Apr 2026

Charlie Hyman

CEO