



KIDDERMINSTER HARRIERS FC
SAFEGUARDING POLICY
August 2024

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Agreed by: Richard Lane - Chairman

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Child Protection Policy

Introduction

Kidderminster Harriers FC aims to create an atmosphere where all children feel valued and safe and a place where their welfare is always promoted as a priority.

Safeguarding principles

Part of the Club philosophy is the commitment to safeguarding and promoting the welfare of young people and adults at risk. We expect all staff, volunteers, participants, any partner agencies or any commissioned service providers to share this commitment. The Boards of both the Club and Kidderminster Harriers Community Trust insist that this principle is embedded and seen in all we do.

Aims

The aims of the Club and Trust's Safeguarding Policies are to:

1. Develop a positive and pro-active approach to safeguarding to best protect all children, young people and adults at risk who use our facilities or engage in associated activities, enabling them to participate and achieve in an enjoyable and safe environment.
2. Facilitate the provision of a range of child protection and awareness training for all staff or volunteers in line with guidance from The National League, Local Safeguarding Children Boards (LSCBs) and the FA requirements to work with children, young people and adults at risk.
3. Work with our schools in supporting their policies both on school premises and when undertaking partnership work at the Stadium or elsewhere.
4. Cooperate with partners in delivering projects for adults potentially at risk including older people, people with disabilities, mental health participants and those on the recovery projects.
5. Demonstrate safeguarding best practice for the welfare of all children, young people and adults at risk.
6. Promote ethical work with children, young people and adults at risk.
7. Work towards achieving the National Standards set by the FA and National League and post Standards for Safeguarding and Protecting Children in Sport, devised by the Child Protection in Sport Unit of the NSPCC

Key principles

The key principles underpinning this Policy Statement are that:

- The welfare of children, young people and adults at risk is, and must always be, the paramount consideration.
- All children, young people and vulnerable adults have a right to be protected from abuse regardless of their age, gender, disability, culture, language, racial origin, religious belief or sexual identity.
- All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately.
- Working in partnership with children, young people and their parents/carers is an essential element of our work.

The Club is committed to working together with Children's Services Departments, and Local Safeguarding Children Boards (LSCB's) in accordance with their procedures and in line with the most recent HM Government guidance - Working Together to Safeguard Children (2015). In addition, the Club is committed to working together with agencies within football to create a safer environment in which all can enjoy the game.

Where the Club believes, or is informed that circumstances exist which may harm any child(ren), young person(s), adult(s) at risk or poses or may pose a risk of harm to them, the matter will be referred, where appropriate, to a statutory agency such as the Police or Social Care Team for further investigation. We will also inform and engage the F.A. Case Management Team to seek advice, support and help to address the risk.

Commitment

The Club's arrangements in fulfilling its commitment to safeguarding children and young people as well as adults at risk:

1. Kevin Bunn is the Senior Safeguarding Manager (SSM) with responsibility for safeguarding. He is supported by Nick Griffiths to ensure a continuous cover is provided. There are Designated Safeguarding Officers (DSO) for all parts of the Club and Trust. All concerns, allegations or disclosures regarding the welfare of children or adults at risk will be referred to the appropriate DSO who will make a decision as to the seriousness and nature of the information and will refer and report to the appropriate agency.
2. The Club and Community Trust have in place a responsible recruitment processes which include: -
 - Statements in job adverts and in job descriptions as to the organisation's commitment to safeguarding
 - Job descriptions
 - Interviews
 - Enhanced DBSs checks for those working with children and young people and adults at risk as required for the role.
 - The taking up of two written references

Appendix 1 provides our full Safer Recruitment Policy as recommended by the National League and FA.

The Club and Trust also outlines its commitments and requirements for safeguarding to all partner organisations and any commissioned service providers.

3. Where a DBS check reveals offences a risk assessment will be undertaken by sub-group of the Welfare, Safeguarding and Equality Group. This risk assessment will consider the suitability of the applicant based on the nature and seriousness of the offence(s), when committed and the attitude of the applicant to the offences(s). We will also engage the FA Caseworker and Safeguarding Team for their interventions and advice where necessary.

The Club welcomes applications from ex-offenders where the relevant offences are disclosed.

4. The Club and Trust accept and adopt The Football Association's and The National League's safeguarding policies and procedure.
5. The Club ensures, where the role requires, all staff and volunteers complete The FA Safeguarding Children Workshop, Safeguarding for All and Player Welfare courses, (subject to the individual's role). In addition, all staff and volunteers receive in-house training on identifying and reporting concerns in respect of safeguarding. In addition, support is provided for those involved in dealing with reporting incidents.
6. The Club is committed to ongoing safeguarding training and development, appropriate to the role of the employee and the level of their involvement with children, young people and adults at risk.
7. The Club and Trust are committed to the sharing of information to protect children and young people, in line with Working Together (2013) and the Data Protection Act (1998).
8. In addition to this Safeguarding Policy, the Club and Community Trust promote initiatives which seek to address and encourage young people's and families' enjoyment as participants and spectators. Where these initiatives promote and encourage children under 16 to attend matches as spectators, the club will take all necessary steps for children to be accompanied by an adult, which based on police advice is those aged under 12, taking all reasonable steps within the stadium for the children to be safe, with and without adult supervision and responsibility.

Matchday child protection

All actions taken by the club to encourage children to attend matches should have the protection of children at the centre of its activities with the necessary priority taken to ensure children are safe. All children under 12 must be accompanied by an adult and all reasonable attempts by the club to ensure this is adhered, when purchasing tickets should be taken to ensure this applies to help the club in discharging its responsibility for children to be safe at matches.

All ball boys and girls, selected from the clubs Junior Teams (aged under 13 to 16) must be accompanied by a club representative and be visible by wearing a high visibility bib for match stewards and the responsible person to easily identify at the matches. The ball boys and girls must be briefed by the club representative before the match on their role and where to report during the match at half-time and the end of the match as well as the evacuation points where necessary.

Equality

Kidderminster Harriers FC are fully committed to providing an inclusive and welcoming environment for everyone who wishes to be involved in the Club. We believe that every person who engages with the Club has a right to be treated fairly, with dignity and respect, irrespective of their personal characteristics.

The Club is therefore committed to avoiding and eliminating discrimination of any kind in the Club and will under no circumstances condone unlawful discriminatory practices. The Club takes a zero-tolerance approach to discrimination, harassment, victimisation, bullying and abuse and endorses the principle of equality, valuing diversity and inclusion and combating unfair treatment throughout its organisation, supporters, and staff.

Equality Statement

The Club is committed to and endorses the principle of equality and strives to ensure that everyone who wishes to be involved in the Club and its activities whether as a supporter, player, the local community, customer, community outreach participant, employee, Board member, contractor, volunteer, partner, or supplier:

- Can be assured of an environment in which their rights, dignity and individual worth are respected, and in particular they are able to enjoy their engagement at the Club without the threat of intimidation, victimisation, harassment, bullying and abuse; and
- Have a genuine and equal opportunity to participate to the full extent of their own ambitions and abilities, without regard to their age, disability, gender reassignment, marital or civil partnership status, pregnancy or maternity, race, religion and belief, sex, or sexual orientation.

Our aim is to embed equality across all levels of the Club.

Through this Policy, the Club aims to ensure that the message of equality is followed and actively practiced.

Appendix 5 provides the clubs full Equality, Diversity and Inclusion Policy.

Reporting Concerns and Whistleblowing Policy

Although this policy gives details of how to raise concerns, there is a stand-alone policy.

That policy sets out how individuals can raise concerns particularly about the safety and welfare of children, young people and vulnerable adults involved at Kidderminster Harriers FC and the Community Trust. There may also be issues around equality or discrimination matters that raise concerns that may be raised in a similar manner. Those principles also cover all other aspects of malpractice by individuals, within the Club, projects or as part of the Trust's practices.

It provides a method of raising concerns and how people can receive feedback on any action taken.

Appendix 2 provides our full whistleblowing policy as defined by the National League and FA.

Anti-bullying

We at Kidderminster Harriers Football Club are committed to providing a caring, friendly and safe environment for all of our participants so they can participate in activities in a relaxed and secure atmosphere.

Bullying of any kind is unacceptable at our club. If bullying does occur, all participants, parents and carers should be able to identify, report and know that incidents will be dealt with promptly and effectively. We are a TELLING club. This means that anyone who knows that bullying is happening is expected to tell the Designated Safeguarding Officer or lead coach of the session or Project.

Appendix 3 provides full details of the Anti-bullying Policy.

Statement on working ethically with Children and Adults at Risk

The Club and Trust has a statement on ethical working. All at the Club and Trust should have read this and followed its principles.

Legislation

The Children Act 1989 currently provides the legislative framework for child protection in England. Key principles established by the act include:

- the paramount nature of the child's welfare
- the expectations and requirements around duties of care to children.

The Children Act 2004 strengthens the 1989 Act. Encourages partnerships between agencies and creates more accountability. The Safeguarding Vulnerable Groups Act 2006 established a single body to make decisions about individuals who should be

barred from working with children and to maintain a list of these individuals.

Safeguarding Children

Kidderminster Harriers FC acknowledges its responsibility to safeguard the welfare of every child and young person who has been entrusted to its care and is committed to working to provide a safe environment for all members. A child or young person is anyone under the age of 18 engaged in any club football activity. We subscribe to The Football Association's Safeguarding Children Policy and Procedures and endorse and accept the Policy Statement contained in that document.

Policy Statement:

We believe that every child has the right to protection from abuse and exploitation. Safeguarding and protection of all children is everyone's responsibility. Kidderminster Harriers FC believes that it is always unacceptable for any child to experience abuse of any kind and recognises its responsibility to safeguard and protect the welfare of all children. By adhering to our safeguarding policies, procedures and processes we will do everything possible to safeguard children at our club, affiliated teams and within our Community Club Organisation (CCO).

Kidderminster Harriers FC recognises and is committed to the following principles:

- The child's welfare is, and must always be, the paramount consideration.
- All children and young people have a right to be protected from abuse regardless of their age, gender, disability, race, sexual orientation, faith, or belief.
- All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately.
- Essential working with partner organisations, children and young people and their parents/carers.

Purpose and aim of policy:

Kidderminster Harriers FC will always seek to provide protection for the children who receive our services. We will provide all staff with guidance and access to Safeguarding policies and procedures which they should adopt should they suspect that a child is at risk of harm.

Who policy applies to:

This policy applies to all who are involved with Kidderminster Harriers FC and the Community Trust. This includes all the Club board, staff, volunteers, sessional workers, and contractors.

Types of Abuse:

Physical - A child is physically hurt or injured by an adult, or an adult gives alcohol or drugs to a child or young person. Common types of physical abuse include hitting, slapping, punching, kicking, scalding, and burning, inappropriate or unlawful use of restraint.

Sexual Abuse - When a child or young person is sexually abused, they are forced or tricked into sexual activities. They might not understand that what is happening is abuse or that it is wrong. And they might be afraid to tell someone. Sexual abuse can happen anywhere – and it can happen in person or online. It is never a child's fault they were sexually abused – it is important to make sure children know this.

Emotional abuse - Is any type of abuse that involves the continual emotional mistreatment of a child. It is sometimes called psychological abuse. Emotional abuse can involve deliberately trying to scare, humiliate, isolate, or ignore a child. Emotional abuse is often a part of other kinds of [abuse](#), which means it can be difficult to [spot the signs](#) or tell the difference, though it can also happen on its own.

Neglect - Where a child's basic physical needs are consistently not met, or they are regularly left alone or unsupervised. Neglect is a persistent failure to meet basic needs (physical or emotional), and it leads to serious harm to the health or development of a child. Neglect can be failing to provide adequate shelter, clothing, or food, not protecting a child from harm or danger as well as failing to access medical care or treatment for a child when it is needed.

Grooming - Is when someone builds a relationship, trust and emotional connection with a child or young person so they can manipulate, exploit, and abuse them. Children and young people who are groomed can be [sexually abused](#), [exploited](#) or [trafficked](#). Anybody can be a groomer, no matter their age, gender, or race. Grooming can take place over a short or prolonged period – from weeks to years. Groomers may also build a relationship with the young person's family or friends to make them seem trustworthy or authoritative.

Child sexual exploitation (CSE) - Is a type of [sexual abuse](#). When a child or young person is exploited, they are given things, like gifts, drugs, money, status, and affection, in exchange for performing sexual activities. Children and young people are often tricked into believing they are in a loving and consensual relationship. This is called [grooming](#). They may trust their abuser and not understand that they are being abused.

Trafficking - Children and young people can be [trafficked](#) into or within the UK to be sexually exploited. They are moved around the country and abused by being forced to take part in sexual activities, often with more than one person. Young people in gangs can also be sexually exploited. Sometimes abusers use violence and intimidation to frighten or force a child or young person, making them feel as if they've no choice. They may lend them large sums of money they know cannot be repaid or use financial abuse to control them. Anybody can be a perpetrator of CSE, no matter their age, gender, or race. The relationship could be framed as friendship, someone to look up to or romantic. Children and young people who are exploited may also be used to 'find' or coerce others to join groups.

Bullying - Is behaviour that hurts someone else. It includes name calling, hitting, pushing, spreading rumours, threatening, or undermining someone. It can happen anywhere – at school, at home or online. It is usually repeated over a prolonged period and can hurt a child both physically and emotionally.

Cyberbullying - Is bullying that takes place online. Unlike bullying offline, online bullying can follow the child wherever they go, via social networks, gaming, and mobile phone.

Online abuse - Is any type of abuse that happens on the internet. It can happen across any device that is connected to the web, like computers, tablets, and mobile phones. And it can happen anywhere online, including:

- social media
- text messages and messaging apps
- emails
- online chats
- online gaming
- live-streaming sites.

Children can be at risk of online abuse from people they know or from strangers. It might be part of other abuse, which is taking place offline, like bullying or grooming. Or the abuse might only happen online.

Criminal exploitation - Is child abuse where children and young people are manipulated and coerced into committing crimes.

Example:

County Lines - Is the police term for urban gangs exploiting young people into moving drugs from a hub, normally a large city, into other markets - suburban areas and market and coastal towns - using dedicated mobile phone lines or "deal lines." Children as young as 12 years old have been exploited into carrying drugs for gangs. This can involve children being trafficked away from their home area, staying in accommodation, and selling and manufacturing drugs.

Domestic abuse - Is any type of controlling, bullying, threatening or violent behaviour between people who are or have been in a relationship. It can also happen between adults related to one another. It can seriously harm children and young people, and experiencing domestic abuse is child abuse. It is important to remember that domestic abuse:

Female Genital Mutilation (FGM) - Is when a female's genitals are deliberately altered or removed for non-medical reasons. It is also known as 'female circumcision' or 'cutting' but has many other names.

Other Policies:

Please read this policy in conjunction with our other club policies and procedures relating to Safeguarding in football:

- Safeguarding Policy
- Adults at Risk Policy
- Equality, Inclusion & Diversity Policy
- Whistleblowing Policy
- Social Media Policy
- Anti Bullying Policy

- Safer Recruitment Policy
- Adult Player Code of Conduct
- Coaches, Team Managers and Club Officials Code of Conduct
- Spectators & Parents/Carers Code of Conduct
- Young Player Code of Conduct

Useful further reading and associated external policies:

- [Safeguarding - Rules & Regulations | The Football Association \(thefa.com\)](https://www.thefa.com)

Responding to Concerns or Allegations:

It is not the responsibility of anyone employed by Kidderminster Harriers FC in a paid or unpaid capacity to decide whether the alleged harm or abuse has taken place. However, it is the responsibility of all staff and volunteers to act, by reporting any concerns or allegations of abuse of a child to the Club Welfare Officer (CWO)/Designated Safeguarding Officer (DSO) or by contacting the appropriate authorities.

When to report suspicions or incidents:

Staff are not expected to be experts in recognising abuse; however, staff should be vigilant and respond swiftly and appropriately. If any of the following circumstances occur, you should report this immediately to the CWO/DSO.

Make a written record of the incident or grounds for concern:

You will be guided by the CWO/DSO as to how, when and by whom the parents of the child are to be informed:

- If you suspect a child may be the victim of abuse by any person, including neglect, physical, sexual, or emotional abuse.
- If a child appears to have been the victim or perpetrator of bullying, including on-line cyberbullying.
- If you observe any injuries/marks on a child which they cannot account for, their explanation for the injury seems unlikely or you have suspicions as to how the injury may have been caused.
- If there is a sudden change in behaviour, i.e., the child/young person's behaviour alters significantly, they become withdrawn or tearful. If a child voices their intentions to self-harm or if you suspect, he/she may be exhibiting signs/symptoms of self-harm or an eating disorder.
- If you suspect a child has been exposed to any inappropriate or indecent images or discloses any inappropriate on-line behaviour.
- If you accidentally hurt a child or young person, or you observe another adult hurting a child.
- If he/she seems distressed in any manner, and you have concerns for their emotional state or welfare.
- If a child or young person appears to be sexually aroused by your actions or may have developed an infatuation with you or another member of staff.

- If a child or young person misunderstands or misinterprets something you have done, which may compromise your position or working relationship with that child.

Do not worry that you may be mistaken. Being worried about doing the wrong thing is not a reason not to act. It is better to have discussed it with somebody with the experience and responsibility to make an assessment.

How to report a concern:

- **If the child is in danger or injured, then call the emergency services.**
- If you receive an allegation, or have suspicion, or disclosure of poor practice or abuse. Report this to your CWO/ DSO.
- CWO/DSO will gather the relevant information and inform the National League DSO (Steps 1 & 2), or County FA DSO so that a decision can be made as to who should investigate the matter or escalate to the FA Safeguarding Case Management Team should the matter meet the `threshold`.
- CWO/DSO to submit an incident form within 24 hours and send it to CFA DSO.

Possible outcomes:

If concern is considered poor practice/misconduct:	If concern is considered, to be potential abuse:
Refer to CWO/DSO for resolution.	Criminal / Child protection investigation/ prosecution
Club Resolution	Investigation by the FA Safeguarding Case Management Team
Club Disciplinary action.	Resolution as poor practice / misconduct
No further action	Club Safeguarding procedures

Under 18 players in open age football

Appendix 6 provides the clubs policy and approach to young players playing open age football, specifically those selected for the 1st team and the necessary protocols and permissions to safeguard the child/young person.

Adults at risk of harm

An adult at risk of harm is a person aged 18 or over who has needs for care and support (whether the local authority is meeting any of those needs) and:

- is experiencing, or at risk of, abuse or neglect, and:
- because of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

An individual's level of vulnerability to harm may vary over time depending on the circumstances they are in and their needs at that time. Not all adults with care and support needs will be at risk of harm. This will depend on the individual, their current situation, and the circumstances they are in.

Abuse:

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

Capacity:

Capacity refers to an individual adult's ability to take a specific decision or take a particular action at a particular time even if they are able or not able to make other decisions at other times. The starting point should be that the person has capacity to decide unless it can be established that they cannot.

Care and Support needs:

Care and support needs can arise from or are related to a physical or mental impairment or illness and are not caused by other circumstantial factors. This includes if the adult has a condition because of physical, mental, sensory, learning, or cognitive disabilities or illnesses, substance abuse or brain injury. This list is not exhaustive.

Safeguarding Concerns:

Any concerns will be taken seriously and acted upon appropriately and we will pay attention to what adults feel. We will be rigorous and vigilant in protecting everyone using our services from abuse, bullying and intimidation. We will do this through a careful recruitment and selection process, on-going supervision and monitoring arrangements and guidance on appropriate behaviour.

Everyone involved in the Club is obliged to make sure that anyone using the services is safe. They must report concerns without delay. All those involved with us will be made aware of this policy and of what to do if they have any concerns. There is guidance for those responsible for responding to concerns so that they are properly dealt with.

Appendix 4 provides our full Adults at risk policy and commitment.

Safeguarding Roles and Responsibilities

All Coaches, Staff, Volunteers and Board members have responsibility for the following:

- Being aware of this policy as well as the Club and Trust's other safeguarding policies.
- Listening to, and seeking out, the views, wishes and feelings of children and young people, ensuring in this that the child's voice is heard and referred to.
- Knowing of the Senior Safeguarding Manager and the Designated Safeguarding Officers.
- Being alert to the signs of abuse, including specific issues in Safeguarding and their need to refer any concerns to the Safeguarding Leads.
- That any concerns any staff have about senior staff should be referred to the Chairman or Chair of Trustees.
- To be aware of Whistleblowing procedures and where to obtain further information, advice and support
- Ensuring that their Child Protection training is up to date, undertaking refresher/update training at least annually.
- Sharing information and working together with agencies to provide children and young people with the help and support they need.
- Supporting pupils who have been abused in accordance with their Child Protection Plan.
- Seeking early help where a child and family would benefit from coordinated support from more than one agency (e.g. education, health, housing, police) to prevent needs escalating to a point where intervention would be needed via a statutory assessment.

Board members are responsible for:

- Taking leadership responsibility for the Safeguarding and Child Protection arrangements.
- That they are up to date with emerging issues in Safeguarding and recognise the strategies by the Local Authority in trying to keep children safe In Derbyshire.
- Ensuring that they have a nominated link Board member for Child Protection and Safeguarding who can also provide a link to the Local Authority on matters of Safeguarding and liaising with other partners and agencies.
- Ensuring that the Senior Safeguarding Manager and the Designated Officers are fully equipped with the knowledge and skills to carry out the role and have access to appropriate regular training to help them keep up to date.
- There are procedures in place in handling allegations against Coaches, Staff, or Volunteers.
- That all Staff, (including volunteers and frequent visitors) who will be working in the Club or Trust are given a mandatory induction which includes knowledge regarding abuse, neglect, specific safeguarding issues and familiarisation with Child Protection responsibilities. The induction will also include procedures to be followed if anyone has any concerns about a Child's Safety or welfare, and knowledge about the policies and procedures.

- That all Coaches and Staff have regular reviews of their own practice to ensure ongoing personal/professional development.
- That all Coaches and Staff, including volunteers, receive the appropriate training which is regularly updated.
- That important policies such as those for behaviour and bullying, are kept up to date.
- Acting on the 'Learning from Serious Case Reviews'. Ensures that all Coaches, Staff, Board members and Volunteers are made aware of the Whistleblowing Policy.
- That all Child Protection records are kept centrally, kept up to date, are secure and reviewed annually.

Recruitment, Staffing:

- We must prevent people who pose a risk of harm from working with children by adhering to statutory responsibilities to check Coaches and Staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required.
- We must ensure Coaches, Staff and Volunteers undergo appropriate checks via the Disclosure and Barring Service (DBS) relevant to their post.
- We must have procedures in place to make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed, removed due to Safeguarding concerns, or would have been had they not resigned; aware that this is a legal duty.
- That our Volunteers are adequately supervised, being aware of the differences between supervised and unsupervised interaction with the children.
- We will be mindful of who we are hiring our premises to and refuse the hiring of premises for any activity deemed not in the interests of the children/young people, the Trust, the local community and or viewed to be inflammatory e.g.- banned political groups.

Records

All concerns about a child will be recorded and records kept. This record will be a separate child protection/welfare record held on a separate child protection file and each concern clearly recorded with all decisions, actions taken and with outcomes and feedback to the referrer. We will endeavour to keep centralised records, hold them as private and confidential records but allow access to key staff that are designated in a role to safeguard children at the Trust.

Dealing with allegations against coaches, staff and volunteers who work with children.

If a member of staff has concerns about another member of staff, then this will be referred to the Senior Safeguarding Manager. Where there are concerns about the Senior Safeguarding Manager this will be referred to the deputy Senior Safeguarding Manager.

The Club will ensure they have followed all the necessary duties and processes under this process and under the Reporting Concerns and Whistleblowing Policy.

Management of the Policy

Board members will;

- Ensure all trustees are effective in the management of safeguarding.
- Ensure all Coaches and Staff including all other Trustees and volunteers read and have access to the policy.
- That is overseen to ensure its implementation.
- Review its content on an annual basis and after any significant incidents.

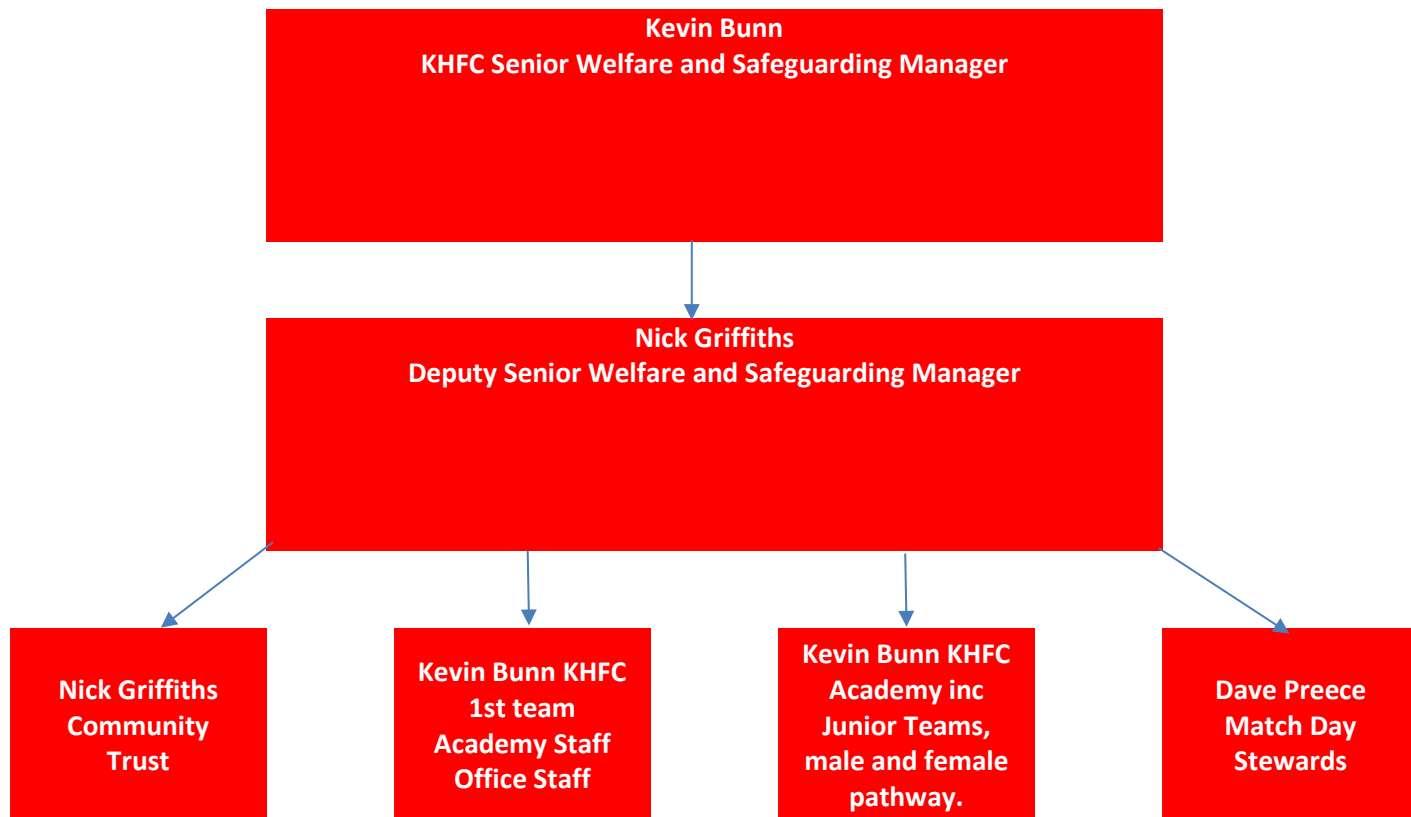
Contacts

Relevant officers within the Club and Trust are detailed on the Safeguarding and Equalities Reporting Tree (Appendix A).

External practitioners and advice

- Julie Lymer – County FA Safeguarding Manager- 01905 827137
Safeguarding@worcestershirefa.com
- NSPCC 24-Hour Help-line - 0808 800 5000 alternatively you can text on 88858
- Worcestershire Children's Services – 01905 768020
- West Mercia Police - 101
- Social care Contact Centre – 0845 607 2000
- Childline- 0800 11 11
- NSPCC Football Hotline- 0800 023 2642
- safeguarding@thefa.co.uk

SAFEGUARDING & QUALITIES: REPORTING PROCESS:



IF YOU ARE MADE AWARE OF A SAFEGUARDING OR EQUALITIES ISSUE THEN YOU SHOULD REPORT IT TO YOUR DEPARTMENTS DESIGNATED SAFEGUARDING OFFICER AS SOON AS POSSIBLE

IF YOU CANNOT REPORT THE ISSUE TO YOUR DESIGNATED SAFEGUARDING OFFICER, YOU SHOULD REPORT IT TO THE WELFARE & SAFEGUARDING OFFICE KEVIN BUNN – 07866 535 309 OR THE DEPUTY WELFARE AND SAFEGUARDING OFFICER NICK GRIFFITHS – 0771 9287927 (24 HOURS) SAFEGUARDING@HARRIERS.CO.UK

IF YOU FEEL THAT YOU ARE NOT COMFORTABLE REPORTING THE ISSUE INTERNALLY THEN CONTACT: NSPCC HOTLINE – 0800 023 2642 or SAFEGUARDING@THEFA.COM.

Appendices

Appendix 1 - Safer Recruitment

Appendix 2 – Whistleblowing Policy

Appendix 3 – Anti bullying Policy

Appendix 4 – Adults at Risk

Appendix 5 – Equality, Diversity and Inclusion Policy

Appendix 6 – First Appearance and Travel Policy (under 18 player)

Appendix 1 – Safer Recruitment

Policy Statement

Kidderminster Harriers FC is committed to promoting the welfare of all children and adults who use and interact with the Clubs' services and for keeping them safe.

In line with the equal opportunities policy, Kidderminster Harriers FC is committed to equality, valuing diversity, and working inclusively across all its activities – and this applies also to the selection, recruitment and induction of new staff and volunteers.

It is recognised that some clubs are in the fortunate position to be able to employ staff. While these guidelines put special emphasis on recruiting volunteers to work with children and young people, they **should also** be applied to the recruitment of paid staff.

What is Safer Recruitment?

Safer Recruitment is a process designed to protect children's and adults at risk welfare at every point, by supporting those leading an employment process to identify and deter or reject individuals from jobs or opportunities if they are deemed to not be suitable to work with children and adults at risk.

Every employer requires a recruitment policy in place to ensure job applicants are considered equally and fairly, and are not discriminated against based on their race, nationality, ethnicity, religion, gender, sexual orientation, marital or civil partner status, disability, or age. Safer Recruitment takes this further.

Safer Recruitment pre-employment checks make sure that applicants' references have been cross-checked and that they have proof of identity. It also ensures that criminal convictions have been declared and that candidates have an up-to-date DBS certificate prior to employment.

Why is Safer Recruitment Important?

Safer recruitment practices are a key part of creating safe environments for children and adults at risk. By ensuring the safety of the staff and volunteers that work in places like football clubs and associated Community Club Organisations the people that need to be safeguarded have access to places where they can feel confident that they will be safe from harm.

It is also important to establish safer recruitment standards and procedures because it is one of the most effective ways of preventing abuse or mistreatment in a variety of institutions.

Our safer recruitment process demonstrates that Kidderminster Harriers FC and Community Trust are committed to keeping the people in our football club safe.

The FA's Policy on DBS Checks

As part of our safeguarding children strategy, The FA requires those working in eligible roles with children and young people to undertake a DBS Enhanced Check. This is in line with legislation and government guidance and is standard practice.

The FA provides the framework and guidance for DBS Checks in football. The leagues and clubs must implement this to ensure those required to have DBS Checks done have them.

Where the DBS Check highlights relevant information, this is investigated further by the FA and a risk assessment is carried out to establish whether they will be accepted to work with children and young people in football.

Activities that require a DBS Check

Not everyone is eligible for an enhanced DBS check. The FA does not determine who is eligible, this is governed by legislation and government guidance and depends on the tasks that are due to be undertaken within a given job role. In brief this means a DBS Check is required for anyone aged 16 years or over who undertakes any potentially unsupervised roles working directly with children and young people.

These activities include managing, training, coaching, and supervising as well as giving advice or guidance on wellbeing, caring for children, or driving a vehicle solely for children on behalf of a club or organisation. All coaches and managers working directly with under-18 players must hold a current, FA-accepted DBS Check.

As of 2024 this includes managers/coaches who operate in the Open Age Game where they have U18 players.

What are 8 Steps to Safer Recruitment?

Steps	What do we need to do?
Step 1 – Role Profile	<ul style="list-style-type: none">• Describe the main tasks and responsibilities.• Identify the skills and experience required to fulfil the role.• Ensure the final role profile is agreed by the club/league committee.
Step 2 - Advertising	<ul style="list-style-type: none">• Ensure club/league members are aware of employment/volunteering opportunities, as well as advertising outside the club/league.• Make use of club/league websites/ newsletters/e-zine, social media e.g. Twitter/club Facebook page, local sports hall, and school notice boards.• Ensure the advert reflects the club/ league's Safeguarding Children Policy, details the skills/experience required and the duties to be undertaken.• Do not discriminate in terms of age, race gender or disability.

Step 3 – Application Form	<ul style="list-style-type: none"> • Require the completion of an Application Form, such as the version attached – see appendix. • At least two officials must be involved in considering the application forms. • Official photo identification documents must be seen to confirm the identity of the person e.g. passport, driving licence, bus/train pass.
Step 4 – Meeting/Interview	<ul style="list-style-type: none"> • Club/league officials need to meet/ interview everyone who has offered to volunteer; more than one official must be present. • The meeting/interview questions (prepared in advance) must provide the applicant the opportunity to recount experiences and give examples of how they have or would handle situations. • While it is important to gain information about an applicant’s technical abilities, it is also necessary to explore their attitudes and commitment to child welfare.
Step 5 - References	<p>At least two references must be requested from individuals who are not related to the applicant. These can be detailed on the application form.</p> <ul style="list-style-type: none"> • One reference needs to be from the applicant’s place of work and one that ideally demonstrates they have been involved in sport, working with children. • References must be followed up before they begin to work at the club/league. If either reference raises any concerns, you are advised to contact your County FA Designated Safeguarding Officer for advice and guidance.
Step 6 – Disclosure and Barring Service (DBS) Checks	<p>Establish if the role requires a Disclosure and Barring Service Enhanced Check by referring to FA Guidance Notes 3.5: Eligibility of Roles.</p> <ul style="list-style-type: none"> • Applications for DBS Checks need to be dealt with by the welfare officer. • If an applicant claims to have an FA DBS Enhanced Check, this can be clarified via The FA’s Whole Game System to which your welfare officer will have access.
Step 7 – Recruitment Decisions	<ul style="list-style-type: none"> • Consider all the information you receive via: <ul style="list-style-type: none"> i.The application forms. ii.Confirmation of identity. iii.Outcome of the take-up of references. iv.Whether the person is accepted by The FA following their DBS Check. • This information should then be considered alongside the outcome of the meeting/interview to make an informed decision as to whether to accept them into the club or league.

Step 8 – Once in Post	<p>Ensure new employees / volunteers:</p> <ul style="list-style-type: none"> • Are clear about and have signed up to the role and its specific responsibilities. • Are made aware of and sign up to the club/league’s Safeguarding Children Policy and Procedures and codes of conduct. • Attend appropriate FA Safeguarding Children Training*. • Are supported in-post for the first few weeks. This may simply be by via observation or more structured and pro-active mentoring. • Are introduced to relevant club/league officials (and parents/carers when appropriate). • Are encouraged to attend further training specific to their role, as appropriate. • Have a clear review period(s) built into their induction process, so that there are opportunities to seek clarification and feedback can be given.
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It is important to recognise that volunteers may have limited relevant experience but can offer transferable skills, enthusiasm, an appetite to learn and an understanding of the ethos and behaviours required at your club/league. Investing time and energy in supporting committed individuals to gain experience and skills is often the way to find much-needed volunteers.

Further Advice and Guidance

Safeguarding Children is about putting in place the best possible practices and procedures. This will protect not only the child but also the club/league and the adults working with under-18s in football. If you require any further support or guidance relating to children and young people, please contact your league Designated Safeguarding Officer (National Leagues Steps 1 & 2 only) or your County FA Designated Safeguarding Officer.

Employees / Volunteers and others in football should be assured that The FA will consider the Rehabilitation of Offenders Act (ROA), 1974 and only consider offences which we are entitled to in relation to the ROA Exceptions Order, 1975. The FA will only share information with those who are involved in the recruitment decision.

Appendix 2 – Whistleblowing Policy

Purpose:

Kidderminster Harriers FC is committed to conducting all business in a professional and ethical way and we expect all staff and volunteers to maintain the same high standards. The club is committed to developing a culture where it is safe and acceptable for all involved in activities across the club to raise concerns about any unacceptable practice, behaviour, wrongdoing or misconduct. The purpose of this policy is to make clear that club staff can whistle blow without fear of victimisation, subsequent discrimination or disadvantage. This Whistleblowing policy is intended to encourage and enable everyone to raise serious concerns directly to the club. We do not want staff to overlook a problem or seek a resolution outside of the club without first bringing the matter to our attention.

Statement:

Kidderminster Harriers FC understands that occasionally things go wrong, if they do go wrong then we ask you to tell us. Whistleblowing concerns misconduct, illegal or underhand practices by individuals and, an organisation; and in as far as safeguarding goes- about the way care and support is being provided, such as practices that cause harm, or the risk of harm to others, or are abusive, discriminatory or exploitative.

What is Whistle Blowing:

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

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

Any adult or young person with concerns about colleagues conduct towards a child, young person or adult at risk can also use whistle blowing by contacting the people and organisation as listed below.

The law provides protection for those who raise legitimate concerns about specified matters, known as qualifying disclosures. A qualifying disclosure is one made in the public interest if an employee has a reasonable belief that one of the following has taken place:

- fraud and/or money laundering.
- a bribe, offered or received.
- a criminal offence.
- a miscarriage of justice.
- an act creating risk to health and safety.
- an act causing damage to the environment.
- breach of any laws, regulations, other legal obligations or The FA Group's policies or procedures; or
- other serious risk that threatens clients, colleagues, the public, the environment, or The FA Group's reputation; and

- concealment of any of the above; is being, has been, or is likely to be committed. It is not necessary for you to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient. Please be aware that you have no responsibility for investigating the matter as it is The FA Group's responsibility to ensure that an investigation takes place.

If you have reported a safeguarding concern about a child or an adult at risk and feel that it has not been dealt with correctly. Then there are a number of organisations you can and should escalate your concern to. This the same if you wish to raise a concern around the behaviour or actions of someone which could lead to potential repercussions against you within you club environment. This whistleblowing policy affords you the chance to get the correct outcome without the risk of it coming back on you from within the club.

Reporting a concern, useful contacts:

-Club Welfare Officer: Kevin Bunn

Contact number: 07576 296011

Email Address: Kevin.Bunn@harriers.co.uk

-National League DSO: Martyn Cannon

Contact number: 07842 429798

Email: Safeguarding@thenationalleague.org.uk

-County FA DSO: Julie Lymer

Contact number: 01905 827137

Email Address: Safeguarding@worcestershirefa.com

-FA Safeguarding Team

Contact number: 0800 169 1863

Email Address: Safeguarding@theFA.com

The NSPCC

0800 800 5000

Help@nspcc.org.uk

Appendix 3 – Anti bullying policy

Statement of Intent:

Kidderminster Harriers Football Club are committed to providing a caring, friendly, and safe environment for all our members so they can participate in football in a relaxed and secure atmosphere. Bullying of any kind is unacceptable at our club. If bullying does occur, all club members or parents should be able to tell and know that incidents will be dealt with promptly and effectively.

We are a TELLING club. This means that anyone who knows that bullying is happening is expected to tell the Club Welfare Officer or any committee member. This club is committed to playing its part in teaching players to treat each other with respect.

Objectives of this policy:

- All club members, coaches, officials, and parents should understand what bullying is.
- All club members, officials and coaching staff should know what the club policy is on bullying and follow it when bullying is reported.
- All players and parents should know what the club policy is on bullying, and what they should do if bullying arises.
- As a club we take bullying seriously. Players and parents should be assured that they would be supported when bullying is reported.
- Bullying will **not be tolerated**.

What is Bullying?

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

Examples of bullying:

Verbal: name-calling, sarcasm, spreading rumours, teasing.

Physical: Any form of physical violence, intimidating behaviour, theft, or the intentional damage of possessions. This includes hitting, kicking, and punching.

Emotional: Excluding, tormenting, ridiculing, humiliation, setting people up and spreading rumours.

Racial taunts, graffiti, gestures, homophobic comments, jokes about disabled people, sexist or misogynistic comments.

Cyberbullying: The misuse of digital technologies or communication to bully a person or a group, typically through messages or actions that are threatening and/or intended to cause offence, anxiety or humiliation, Examples of cyberbullying include:

- **Abusive comments**, rumours, gossip, and threats made using digital communications and/ or technologies – this includes internet trolling.

- **Sharing pictures**, videos, or personal information without the consent of the owner and with the intent to cause harm or humiliation.
- **Hacking** into someone's email, phone, or online profiles to extract and share personal information, or to send hurtful content while posing as that person.
- **Creating dedicated websites** that intend harm, make fun of someone, or spread malicious rumours.
- **Pressurising** someone to do something they do not want to, such as sending a sexually explicit.

Whilst the above constitute forms of cyber bullying, it is also important to understand that some of what is described are also criminal offences.

Kidderminster Football Club commits to ensure our website and social networking pages are being used appropriately and any online bullying will be dealt with swiftly and appropriately in line with procedures detailed in this policy.

Why does Bullying take place?

People can be targeted for any reason, but people who bully others target 'difference' and bullying can be a form of wider discrimination. For example, bullying behaviour may be:

- **Racist:** Targeted at ethnicity, skin colour, and language, religious or cultural practices.
- **Homophobic, biphobic and/or transphobic:** Targeted at actual or perceived sexuality and/or gender.
- **Sexual and/or sexist:** This is behaviour that is intended to cause offence, humiliation, or intimidation.
- **Disablist:** Targeted at an impaired or special educational need.
- **Targeting and difference:** Bullying can also be targeted at 'looks,' weight and height, colour of hair, wearing glasses or braces, acne, psoriasis and eczema, scars, marks or conditions of the face or body, body odour, poverty, gifts and talents or family situation (E.g. divorce, bereavement, homelessness).
- **Discrimination:** Bullying because of discrimination occurs when bullying is motivated by a prejudice against certain people or groups of people. This may be because of their gender, age, race, nationality, ethnic origin, religion or belief, sexual orientation, gender reassignment, disability, or ability.

Why is it Important to Respond to Bullying?

Bullying hurts. Everyone has the right to be treated with respect and no one deserves to be a victim of bullying. Individuals who are bullying need to learn different ways of behaving.

Kidderminster Harriers Football Club has a responsibility to respond promptly and effectively to issues of bullying.

Signs and indicators:

A child may indicate by signs or behaviour that he or she is being bullied. Adults should be aware of these possible signs and that they should investigate if a child:

- says he or she is being bullied.
- is unwilling to go to club sessions.

- becomes withdrawn anxious or lacking in confidence.
- feels ill before training sessions.
- comes home with clothes torn or training equipment damaged.
- has possessions go 'missing.'
- asks for money or starts stealing money (to pay the bully).
- has unexplained cuts or bruises.
- is frightened to say what's wrong.
- gives improbable excuses for any of the above.

In more extreme cases, if a child or young person:

- starts stammering.
- cries themselves to sleep at night or has nightmares.
- becomes aggressive, disruptive, or unreasonable.
- is bullying other children or siblings.
- stop eating.
- attempts or threatens suicide or runs away.

These signs and behaviours may indicate other problems, but bullying should be considered a possibility and should be investigated.

Procedures:

1. Report bullying incidents to the Club Welfare Officer, Assistant Welfare Officer, or a member of the Club's Committee/Board.
2. In cases of serious bullying, the incidents will be referred to the County FA Welfare Officer for advice and to The FA Case Management Team.
3. Parents will be informed and will be asked to come to a meeting to discuss the problem.
4. If necessary and appropriate, the police will be consulted.
5. The bullying behaviour or threats of bullying must be investigated, and the bullying stopped quickly.
6. An attempt will be made to help the bully (bullies) change their behaviour.
7. If mediation fails and the bullying is seen to continue the club will initiate disciplinary action under the club constitution.

Recommended Club Action:

If the club decides it is appropriate for them to deal with the situation, they should follow the procedure outlined below:

1. Reconciliation by getting the parties together. It may be that a genuine apology solves the problem.
2. If this fails/not appropriate a small panel (made up from the Chairperson, Club Welfare Officer, Secretary, committee members) should meet with the parent and child alleging bullying to get details of the allegation. Minutes should be taken for clarity, which should be agreed by all as a true account.
3. The same 3 persons should meet with the alleged bully and parent/s and put the incident raised to them to answer and give their view of the allegation. Minutes should again be taken and agreed.
4. If bullying has in their view taken place the individual should be warned and put on notice of further action i.e., temporary, or permanent suspension if the

bullying continues. Consideration should be given as to whether a reconciliation meeting between the parties is appropriate at this time.

5. In some cases, the parent of the bully or bullied player can be asked to attend training sessions, if they are able to do so, and if appropriate. The club committee should monitor the situation for a given period to ensure the bullying is not being repeated.
6. All coaches involved with both individuals should be made aware of the concerns and outcome of the process i.e., the warning.

In the case of adults reported to be bullying anyone within the club under 18:

1. The County Welfare Officer should always be informed and will advise on action to be taken where appropriate; this may include action by The FA Safeguarding Team.
2. It is anticipated that in most cases where the allegation is made regarding a team manager, official or coach, The FA's Safeguarding Children Education Programme may be recommended.
3. More serious cases may be referred to the Police and/or Children's Social Care.

Prevention:

- Kidderminster Harriers Football Club has written Codes of Conduct which include what is acceptable and proper behaviour for all members of which the anti-bullying policy is one part.
- All club members and parents sign the Codes of Conduct upon joining the club.
- The Club Welfare Officer will raise awareness about bullying and why it matters, and if issues of bullying arise in the club, will consider meeting with members to discuss the issue openly and constructively.

CONTACT INFORMATION:

-Club Welfare Officer: Kevin Bunn - **Contact number:** 07576 296011

Email Address: Kevin.Bunn@harriers.co.uk

Assistant Club Welfare Officer: Nick Griffiths – **Contact number:** 0771 928 7927

Email Address: safeguarding@harriers.co.uk

-National League DSO: Martyn Cannon - **Contact number:** 07842 429798

Email: Safeguarding@thenationalleague.org.uk

If at any time you are not able to contact your Club Welfare Officer, or the matter is clearly serious then you can contact your CFA Welfare Officer directly:

-County FA DSO: Julie Lymer - **Contact number:** 01905 827137

Email Address: Safeguarding@worcestershirefa.com

You may wish to access any of the following websites designed to give advice and guidance to parents and children who are faced with dealing with bullying:

Guidance for parents/carers

www.anti-bullyingalliance.org.uk/

www.stonewall.org.uk

www.bullying.co.uk

Guidance for young people

www.youngstonewall.org.uk

www.childline.org.uk

Appendix 4 – Adults at risk

Introduction:

Safeguarding children and adults at risk is of paramount importance for the Club. We are committed to raising awareness and empowering everyone we engage with, to create safer environments and identify and report concerns promptly and effectively. We all share a responsibility for promoting and protecting the safety and welfare of Children and Adults at Risk, irrespective of individual roles and responsibilities.

The safeguarding children policy and procedure, for those under the age of 18, is covered in a separate document.

Kidderminster Harriers FC aim to create an atmosphere where all adults feel valued and safe and a place where their welfare is promoted. This policy sets out the procedures for protecting adults at risk working with the Trust staff, board members or volunteers.

Policy statement:

This Policy outlines the procedures that Kidderminster Harriers Football Club are committed to.

The policy is designed to encourage the development of good practice and stress the responsibility of all, to be alert to early indicators of abuse, neglect, and exploitation and to act quickly when there is any concern regarding the welfare or safety of an adult at risk.

This Policy outlines our approach to safeguarding and applies to everyone involved with the Club. All staff and partner organisations have a role to play in ensuring that the responsibilities/commitments to safeguarding set out in this policy are upheld and at the forefront of everything they do.

The Club accepts that we are required to fulfil our duty of care, which means that we must do everything that can be expected of us to help safeguard and protect people from harm, and to act when we suspect that someone is being harmed or is at risk of harm.

Aims:

The aims of the Club and Community Trust's Safeguarding Policies are to:

- Develop a positive and pro-active approach to safeguarding to best protect all children, young people and adults at risk who use our facilities or engage in associated activities, enabling them to participate and achieve in an enjoyable and safe environment.
- Facilitate the provision of a range awareness training for all staff or volunteers in line with guidance from The National League and in line with The FA requirements.
- Work with our schools in supporting their policies both on school's premises and when undertaking partnership work at the Stadium or elsewhere.

- Cooperate with partners in delivering projects for adults potentially at risk including older people, people with disabilities, mental health participants and those on the recovery projects.
- Demonstrate best practice around safeguarding the welfare of all adults at risk.
- Promote ethical work with adults at risk.
- Work towards achieving the National League Standards for Safeguarding and Protecting Adults at risk.

Principles and values:

The guidance given in the policy and procedures is based on the following principles:

- All adults, regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation status have the right to be protected from abuse and poor practice and to participate in an enjoyable and safe environment.
- The club will seek to ensure that our sport and any other recreational activities are inclusive and make reasonable adjustments for any ability, disability, or impairment, we will also commit to continuous development, monitoring, and review.
- The rights, dignity and worth of all adults will always be respected.
- We recognise that ability and disability can change over time, such that some adults may be additionally vulnerable to abuse, particularly those adults with care and support needs.
- Where the Club believes or is informed that circumstances exist which may harm adult(s) at risk or poses or may pose a risk of harm to them, the Trust will refer the matter to a statutory agency such as the Police or Social Care Team for further investigation. The F.A. Case Management Unit may also be informed.
- We all have a shared responsibility to ensure the safety and well-being of all adults and will act appropriately and report concerns whether these concerns arise within the club, for example inappropriate behaviour of a coach, or in the wider community.
- All allegations will be taken seriously and responded to quickly.

The Club recognises the role and responsibilities of statutory agencies in safeguarding adults and is committed to working with partners to protect adults at risk.

Adults at risk of harm:

Defined as: A person aged 18 or over who has needs for care and support (whether the local authority is meeting any of those needs) and:

- is experiencing, or at risk of, abuse or neglect, and:
- because of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

An individual's level of vulnerability to harm may vary over time depending on the circumstances they are in and their needs at that time. Not all adults with care and support needs will be at risk of harm. This will depend on the individual, their current situation, and the circumstances they are in.

Abuse:

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

Capacity:

Capacity refers to an individual adult's ability to take a specific decision or take a particular action at a particular time even if they are able or not able to make other decisions at other times. The starting point should be that the person has capacity to decide unless it can be established that they cannot.

Care and Support needs:

Care and support needs can arise from or are related to a physical or mental impairment or illness and are not caused by other circumstantial factors. This includes if the adult has a condition because of physical, mental, sensory, learning, or cognitive disabilities or illnesses, substance abuse or brain injury. This list is not exhaustive.

Safeguarding Concerns:

Any concerns will be taken seriously and acted upon appropriately and we will pay attention to what adults feel. We will be rigorous and vigilant in protecting everyone using our services from abuse, bullying and intimidation. We will do this through a careful recruitment and selection process, on-going supervision and monitoring arrangements and guidance on appropriate behaviour.

Everyone involved in the Club is obliged to make sure that anyone using the services is safe. They must report concerns without delay. All those involved with us will be made aware of this policy and of what to do if they have any concerns. There is guidance for those responsible for responding to concerns so that they are properly dealt with.

Commitment:

The Clubs arrangements in fulfilling its commitment to safeguarding adults at risk:

1. Kevin Bunn is the Senior Safeguarding Manager (SSM) with responsibility for safeguarding. There are Club Welfare Officers for all parts of the Club and Trust. All concerns, allegations, or disclosures regarding the welfare of adults at risk will be referred to the appropriate DSO at the National League or County FA who will decide as to the seriousness and nature of the information and will refer and report to the appropriate agency.
2. The Club and Trust have in place responsible Safer Recruitment processes.
3. This policy can be viewed on our Club website. (*)
4. The Club accepts and adopts The Football Association's and The National League's safeguarding policies and procedures whilst further specific and individual Trust policies are developed and adopted.
5. The Club ensures that, where the role requires, all staff and volunteers complete The FA Safeguarding Children Workshop.

6. The Club is committed to ongoing safeguarding training and development, appropriate to the role of the employee and the level of their involvement with adults at risk.
7. The Club is committed to the sharing of information to protect adults at risk, children, and young people, in line with the Data Protection Act (1998).
8. In addition to this Safeguarding Policy, the Club and Trust promote several initiatives which seek to address and encourage young people's and families' enjoyment as participants and spectators.

Reporting Concerns and Whistleblowing Policy:

Although this policy gives details of how to raise concerns, there is a stand-alone policy. That policy sets out how individuals can raise concerns particularly about the vulnerable adults and children involved at Kidderminster Harriers FC and the Kidderminster Harriers Community Trust. There may also be issues around equality or discrimination matters that raise concerns that may be raised in a similar manner. Those principles also cover all other aspects of malpractice by individuals, within the Club, projects or as part of the Trust's practices. It provides a method of raising concerns and how people can receive feedback on any action taken.

Refer to Club Whistleblowing policy.

Anti-bullying:

We at Kidderminster Harriers FC are committed to providing a caring, friendly, and safe environment for all our participants so they can participate in activities in a relaxed and secure atmosphere. Bullying of any kind is unacceptable at our club. If bullying does occur, all participants, parents and carers should be able to tell and know that incidents will be dealt with promptly and effectively. We are a TELLING club. This means that anyone who knows that bullying is happening is expected to tell the Welfare Officer/Designated Safeguarding Officer or lead coach of the session or project. Bullying is not just an issue for children and young people.

Refer to Club Anti Bullying policy.

Responding to Concerns or Allegations:

It is not the responsibility of anyone employed by Kidderminster Harriers FC, in a paid or unpaid capacity to decide whether the alleged harm or abuse has taken place. However, it is the responsibility of all staff and volunteers to act, by reporting any concerns or allegations of abuse of an adult at risk to the Club Welfare Officer (CWO)/Designated Safeguarding Officer (DSO) or by contacting the appropriate authorities.

When to report suspicions or incidents:

Staff are not expected to be experts in recognising abuse; however, staff should be vigilant and respond swiftly and appropriately. If any of the following circumstances occur, you should report this immediately to the CWO/DSO.

Make a written record of the incident or grounds for concern:

You will be guided by the CWO/DSO as to how, when and by whom carers are to be informed:

- If you suspect an adult at risk may be the victim of abuse by any person, including neglect, physical, sexual, or emotional abuse.
- If an adult at risk appears to have been the victim or perpetrator of bullying, including on-line cyberbullying.
- If you observe any injuries/marks on an adult at risk which they cannot account for, their explanation for the injury seems unlikely or you have suspicions as to how the injury may have been caused.
- If there is a sudden change in behaviour, i.e., the adult at risk behaviour alters significantly, they become withdrawn or tearful. If an adult at risk voices their intentions to self-harm or if you suspect, he/she may be exhibiting signs/symptoms of self-harm or an eating disorder.
- If you suspect an adult at risk has been exposed to any inappropriate or indecent images or discloses any inappropriate on-line behaviour.
- If you accidentally hurt a child or an adult at risk, or you observe another adult hurting an adult at risk.
- If he/she seems distressed in any manner, and you have concerns for their emotional state or welfare.
- If an adult at risk appears to be sexually aroused by your actions or may have developed an infatuation with you or another member of staff.
- If an adult at risk misunderstands or misinterprets something you have done, which may compromise your position or working relationship with that adult at risk.

Do not worry that you may be mistaken. Being worried about doing the wrong thing is not a reason not to act. It is better to have discussed it with somebody with the experience and responsibility to make an assessment.

How to report a concern:

- **If the adult at risk is in danger or injured, then call the emergency services.**
- If you receive an allegation, or have suspicion, or disclosure of poor practice or abuse. Report this to your CWO/ DSO.
- CWO/DSO will gather the relevant information and inform the National League DSO (Steps 1 & 2), or County FA DSO so that a decision can be made as to who should investigate the matter or escalate to the FA Safeguarding Case Management Team should the matter meet the `threshold`.
- CWO/DSO to submit an incident form within 24 hours and send it to CFA DSO.

Possible outcomes:

If concern is considered poor practice/misconduct:	If concern is considered, to be potential abuse:
Refer to CWO/DSO for resolution.	Criminal investigation/ prosecution
Club Resolution	Investigation by the FA Safeguarding Case Management Team
Club Disciplinary action	Resolution as poor practice / misconduct
No further action	Club Safeguarding procedures

Other Club Policies: Please read this policy in conjunction with our other club policies and procedures relating to Safeguarding in football:

- General Children Safeguarding Policy
- Equality, Inclusion & Diversity Policy
- Whistleblowing Policy
- Anti Bullying Policy
- Adult Player Code of Conduct
- Coaches, Team Managers and Club Officials Code of Conduct
- Spectators & Parents/Carers Code of Conduct
- Young Player Code of Conduct

Useful further reading and associated external policies:

[1-5-safeguarding-adults-in-affiliated-football-policy-and-procedures-colour-version%20\(11\).pdf](#)

Reporting a concern, useful contacts:

-Club Welfare Officer: Kevin Bunn - **Contact number:** 07576 296011

Email Address: Kevin.Bunn@harriers.co.uk

Assistant Club Welfare Officer: Nick Griffiths – **Contact number:** 0771 928 7927

Email Address: safeguarding@harriers.co.uk

-National League DSO: Martyn Cannon - **Contact number:** 07842 429798

Email: Safeguarding@thenationalleague.org.uk

-County FA DSO: Julie Lymer - **Contact number:** 01905 827137

Email Address: Safeguarding@worcestershirefa.com

Appendix 5 – Equality, Diversity and Inclusion Policy

Club Statement

Kidderminster Harriers FC are fully committed to providing an inclusive and welcoming environment for everyone who wishes to be involved in the Club. We believe that every person who engages with the Club has a right to be treated fairly, with dignity and respect, irrespective of their personal characteristics. The Club is therefore committed to avoiding and eliminating discrimination of any kind in the Club and will under no circumstances condone unlawful discriminatory practices. The Club takes a zero-tolerance approach to discrimination, harassment, victimisation, bullying and abuse and endorses the principle of equality, valuing diversity and inclusion and combating unfair treatment throughout its organisation, supporters, and staff.

Equality Statement

The Club is committed to and endorses the principle of equality and strives to ensure that everyone who wishes to be involved in the Club and its activities whether as a supporter, player, the local community, customer, community outreach participant, employee, Board member, contractor, volunteer, partner, or supplier:

- Can be assured of an environment in which their rights, dignity and individual worth are respected, in particular that they are able to enjoy their engagement at the Club without the threat of intimidation, victimisation, harassment, bullying and abuse; and
- Have a genuine and equal opportunity to participate to the full extent of their own ambitions and abilities, without regard to their age, disability, gender reassignment, marital or civil partnership status, pregnancy or maternity, race, religion and belief, sex, or sexual orientation.

Our aim is to embed equality across all levels of the Club. Through this Policy, the Club aims to ensure that the message of equality is followed and actively practiced.

Legal Obligation

The Club is committed to avoiding and eliminating discrimination of any kind in the Club and recognises that it is unlawful to discriminate directly or indirectly because of an individual's:

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

Individuals will be protected if they have a protected characteristic, are assumed to have a protected characteristic, are associated with someone who has a protected characteristic or with someone who is assumed to have a protected characteristic.

We are fully committed to compliance with all relevant equality legislation, this includes the Equality Act 2010.

The `Club`

The term `club` refers to Kidderminster Harriers FC, all affiliated teams and the Community Trust.

The Club commitment includes, but is not limited to:

- Having a culture of zero-tolerance on abuse, unlawful discrimination, bullying, misogyny, harassment and victimisation
- Dealing with complaints of abuse, unlawful discrimination, bullying, harassment, and victimisation seriously and timeously
- Monitoring recruitment and selection methods
- Providing equal opportunities
- Challenging unconscious bias
- Developing policies and procedures to ensure they do not discriminate unlawfully because of any of the protected characteristics.
- Monitoring the make-up of the workforce regarding protected characteristics to encourage equality, diversity, and inclusion.
- Ensuring all activities promote positive equality, diversity, and inclusion.

Each member of staff and volunteers are expected to adhere to this policy and procedure to ensure that a positive equal, diverse and inclusive opportunities climate exist.

Equality, Diversity and Inclusion Definitions:

Equality - Is ensuring individuals or groups of individuals are not treated differently or less favourably, based on their specific protected characteristic.

Diversity - Is about recognising differences. It is acknowledging the benefit of having a range of perspectives in decision-making and the workforce being representative of the club's customers.

Inclusion - Is where people's differences are valued and used to enable everyone to thrive at the club. An inclusive working environment is one in which everyone feels that they belong without having to conform, that their contribution matters and they can perform to their full potential, no matter their background, identity or circumstances. An inclusive workplace has fair policies and practices in the place and enables a diverse range of people to work together effectively.

Types of Discrimination:

An individual may experience different forms of discrimination. Discrimination may take the form of:

- **Direct discrimination** – this occurs when someone is treated less favourably than another person because of a protected characteristic they have.
- **Indirect discrimination** – this occurs when a condition, rule, policy or practice applies to everyone but particularly disadvantages people who share a protected characteristic.
- **Discrimination by association** - this is direct discrimination against someone because they associate with another person who possesses a protected characteristic.
- **Discrimination by perception** - this is direct discrimination against someone because an individual believes that another individual possesses a particular protected characteristic when they do not have that protected characteristic.
- **Victimisation** – this occurs when someone is treated less favourably because of making or supporting a complaint about discrimination, such as being denied a training opportunity or a promotion because they made/supported a complaint or raised a grievance under the Equality Act 2010, or because they are suspected of doing so.
- **Harassment** – this is where there is unwanted conduct, related to one of the protected characteristics (other than marriage and civil partnership, and pregnancy and maternity) that has the purpose or effect of violating a person's dignity; or creating an intimidating, hostile, degrading, humiliating or offensive environment. It does not matter whether or not this effect was intended by the person responsible for the conduct.
- **Bullying** – this is a form of personal harassment involving the misuse of power, influence or position to persistently criticise, humiliate or undermine an individual.

Failure to make reasonable adjustments is where a physical feature or a provision, criterion or practice puts a disabled person at a substantial disadvantage compared with someone who does not have that protected characteristic and the employer has failed to make reasonable adjustments to enable the disabled person to overcome the disadvantage.

Complaints and Compliance:

In the first instance complaints need to be made to the appropriate Manager or staff member related to the matter, unless the complaint is against the Manager or staff member, which needs to be made to the club welfare and safeguarding officer, Kevin Bunn.

The Club consider all forms of discriminatory behaviour, including (but not limited to) behaviour described in the Legal Obligations section of this Policy as unacceptable, and is concerned with ensuring individuals feel able to raise any bona fide grievance, report or complaint related to such behaviour without fear of being penalised for doing so.

Appropriate sanctions will be taken against any Executive Board member, staff, player, match day fan, participant in outreach programmes and other people engaged with the Club's activities who violate this Equality Policy.

Any individual who believes that they have been treated in a way that they consider to be in breach of this Policy by any other Club representative should in the first instance, and if they feel able to do so try and discuss it with that person. If that does not resolve the matter, or in the case of allegations against the Club itself, the individual may raise the matter with their manager, a staff member or the Club Welfare Officer / Safeguarding Officer.

Unfair Treatment:

All staff and volunteers should understand they, as well as their employer, can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination to fellow employees, volunteers, customers, suppliers, and the public.

Reasonable Adjustments:

To ensure practices remain justifiable and lawful the Club will aim to make the necessary reasonable adjustments relating to all protected characteristics. This includes, but is not limited to, physical features and environmental adjustments in relation to any of its premises ensuring fairness and equality for potential employees, current employees and third-party contractors associated with the Club.

The Club will take all reasonably practicable steps to ensure staff are able to participate in its business activities on an equal basis. You are encouraged to tell the Club if you need appropriate support/reasonable adjustments so that this can be provided.

Recruitment and Selection:

The Club aims to ensure that job applicants do not suffer unlawful discrimination. Recruitment procedures are reviewed regularly, in line with the Equality Act 2010 and Safer Recruitment Guidelines, including but not limited to, to ensure that individuals are treated based on their relevant merits and abilities.

Job selection criteria is regularly reviewed to ensure that they are relevant to the job and are not disproportionate. Shortlisting of applicants is undertaken by more than one person. Job advertisements will avoid stereotyping or using wording that may discourage groups with a protected characteristic from applying.

Applicants will not be asked questions about health or disability before a job offer is made unless those questions are permitted by law, for example, to establish whether

reasonable adjustments might be required for an interview or other selection process, or for equal opportunities monitoring.

The Club requests equality and diversity data from all applicants on a voluntary basis when applying for a position and will regularly review shortlisting as the recruitment process progresses. The information is kept in an anonymised format and retained solely within the Human Resources department. The data is used to support the Club to take appropriate steps to avoid discrimination and improve equality, diversity and inclusion.

The Club is required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status will not be made based on appearance or apparent nationality. All prospective employees, regardless of nationality, must be able to produce original documents before employment starts, to satisfy current immigration and right to work legislation.

Training, promotion and terms and conditions

Employees will be given appropriate access to promotions and training to enable them to progress. All decisions will be made based on merit, ability and job suitability coupled with transparent and justifiable methods.

Workforce composition and promotions will be monitored to ensure equality of opportunity at all levels of the Club. Where appropriate, steps will be taken to identify and remove unjustified barriers and to meet the needs of disadvantaged or underrepresented groups.

Terms and conditions, benefits and facilities will be reviewed regularly to ensure that they are available to all staff who should have access to them and that there are no unlawful obstacles to accessing them.

Responsibility and Key Contacts

The board of directors and Trustees has overall responsibility for the effective operation of this policy and for ensuring compliance with equality legislation. Day-to-day operational responsibility has been delegated to the Human Resources Department.

All Managers must set an appropriate standard of behaviour, leading by example and ensuring that those they manage adhere to this Policy and Procedure. Managers will be given appropriate training on equal opportunities awareness and equal opportunities recruitment and selection best practice.

Associated Policies:

Whistleblowing Policy

Anti Bullying Policy

Appendix 6 – First Appearance and Travel Policy (under 18 player)

Club Statement:

Whenever Kidderminster Harriers FC makes the decision to include a young person under the age of 18 in the first team, or development squad we have a duty of care to ensure their safety. The aim, whilst ensuring the safety, is that the young person can grow their confidence, self-esteem and develop their skills.

When inviting a young player under 18 to a senior or first team game we will consider all the risks and put in place some safeguards.

Therefore, the inclusion of a young person into the squad will be carefully planned, and preparations made well in advance to ensure that any concerns from the player, parents or carers are addressed. We will ensure their safety of first appearances and travel through following our Safeguarding policies and procedures and those of the FA.

Purpose:

This Toolkit has been designed to help Welfare Officers and Designated Safeguarding Officers to prepare and think things through in advance to support your club in safeguarding their young players on their debut. This guidance provides information on good working practices which will be regularly reviewed and, where appropriate, improvements made. Suggestions to improve working practice and safety are welcomed from any source. The information contained in this document has been developed by EFL Clubs and is seen as good practice to support the transition of young players into the adult game, therefore we have adopted this for Steps 1-4. Please ensure you read through the whole document before making any plans.

DBS checks:

When a player U18 is staying overnight at a hotel as part of the senior team, does everyone travelling need a Disclosure and Barring Service (DBS) and must the First Team Manager have a DBS when a player who is U18 is involved in a First Team game?"

Answer: *Not all travelling need to be DBS checked, HOWEVER, The Manager must be!*

Away game travel:

If the debut of the young player is going to occur during an away game, then ensure that at least one person travelling has a DBS. The DBS document will state if the person has clearance for work with the children's workforce or for work with the adult workforce. Those medical professionals who work with both adults and with U18s will require '**child and adult workforce**' on their DBS certificate. The club physio is likely to already have an existing DBS certificate.

Speaking with the player, his parents and all other interested parties, before any debut, would ensure that all of those involved will know what to expect, especially if the team is travelling to an away game. It is important to ensure that everybody understands that no single person is solely responsible' for the care of the young player. Safeguarding is

everyone's responsibility. Therefore, all of those involved should be made aware of their personal responsibilities when a young player is making his debut for the first team. Whilst this policy is written around a debut appearance, the principle will apply for more regular senior appearances. **Note:** The younger the player is, the more vulnerable they may be.

Additional vulnerabilities include:

1. the excitement and anxiety of playing for the first team or senior squad;
2. their keenness to do well and to impress and please the manager, coaches and team;
3. travelling to an away game as the only U18;
4. wanting to be one of the 'grown-ups' but being cautious and reminded of the code-of-conduct for U18s.

Step1 – Talking to parents/carers:

Talk to parents outlining some of the issues detailed in a) – e) below then follow up with a letter enclosing a consent form.

Ask the parents / carers to sign and return the consent form.

- a) Outline what a great achievement it is that their son/daughter has been offered the opportunity to debut with the First Team. If the match is an away game, explain that they are likely to be the only U18 travelling (if that is the case). Explain that they may have been called up, but that does not automatically mean they will play on the day.
- b) Explain that you understand that their son/daughter may be thrilled at the prospect of playing but you are aware that they may also be nervous and even a little anxious. Also, tell them that you will be speaking to them (or have already done so) to reassure them and ensure they are comfortable and knows what to expect.
- c) Explain that if away travel is involved, they will be in a hotel room alone and will not be sharing with any of the other players. The only exception to this would be if two U18s are travelling with the team, in which case they can share a room. Likewise, a child's parent or guardian may also wish to attend and share a room.
- d) Explain that you intend to 'buddy up' their son/daughter with one of the senior players. Seek their support, explain that you would like them to talk to their son/daughter to prepare them and try to ensure they know that this is a great opportunity, which should be enjoyed. Parents / carers should reinforce the fact that if they are uncomfortable about anything they should talk to someone they trust.
- e) Explain that the reasons you are going through this process with them is to try to ensure that everything goes as smoothly as possible for their potential first team appearance.

Step 2 -Talking to the player:

It is highly likely to have been the Academy Manager or First Team Manager who has informed the player that they have been called up. The information in a) – g) below is a follow up conversation which should be undertaken by either the Club Welfare Officer (CWO) / Designated Safeguarding Officer (DSO) or by another appropriate person who the player knows and trusts. Therefore, the timescales for talking to players and parents may be interchangeable.

- a) Congratulate the player on being selected to join the first team squad. Explain that they may have been called up, but that does not automatically mean they will actually play on the day. Be diplomatic in preparing them for this possible disappointment.
- b) Discuss with the player that while you understand that they must be very proud at the prospect of playing, you also understand that they may be nervous and even a little anxious.
- c) Explain that you will try to identify a 'Buddy' for them, and this may be a senior player who can provide support for them during their possible debut. Ask them if there is someone, they think they would feel comfortable with. However, be clear that this may not necessarily be the person who is identified as their 'Buddy'.
- d) Explain to the player that they do not have to tolerate any unacceptable 'banter' or behaviour and that they need to set their own boundaries and know what 'line' must not be crossed personally. Explain that there may quite a bit of 'down-time' and they should think about what they take with him to fill the time.
- e) They also need to know that if the team are travelling to an away game, they will be staying in a separate hotel room and should not share a room with any adult over 18 (Unless it is a parent or guardian).
- f) Outline what is expected of them in respect of a 'code of conduct'. That is what their person responsibilities are during the trip. This includes, specifically, ensuring that they understand they must have no access to alcohol (including the mini bar); no access to adult television or any adult materials: they should not engage in gambling; that they should use any social media platform in a responsible manner, in line with any club policy and must be careful about comments which may be misinterpreted or insulting to others in any way; clarify that they must not make any inappropriate comments about the football environment. The club may have additional responsibilities to add to this list.
- g) Ensure the player, knows, and understands that if they have ANY concerns, they can speak to their 'Buddy', Welfare Officer / DSO, or someone else that they trust.

Step 3 – Talking to the `Buddy`

As the CWO/DSO you will need to identify who may be the most suitable 'Buddy' for the young player. You may need to seek advice on this from the Academy Manager or other members of staff. Remember, however, to be sensitive when deciding on this issue. The idea is to try to support the player through a well-planned transition and not to create an environment where they 'stand out more' and is the focus of more attention.

Also remember the 'Buddy' should be someone that the player will feel comfortable with, however, it should be one of the senior players.

When you talk to the 'Buddy', it is important to stress that they are not responsible for the care of the young player. You are simply asking them to be a sympathetic ear, if required, and a mentor for the young player.

Step 4 – Talking to the person with the DBS

As stated earlier a First Team or Development Squad Match is not an activity designed for U18s, therefore DBS are not required by all the adults involved. However, to provide additional safeguards, one member of the support team should have an FA DBS certificate and be cleared through The FA for work in football. Generally, the club physio may hold an appropriate disclosure.

When you talk to the physio, or other person with the appropriate DBS, it is important to stress that they are not solely responsible for the care of the young player during any trip. The young player will not need constant independent supervision. You are simply asking them to be available for the young player, if required.

Young people over 16 years of age are often capable and legitimately entitled to live independently. A one-night stay in a hotel room alone is something young players may already have done as part of family holidays.

Step 5 – Talking to the Manager and the team

Realistically, it may be only a few days before a game when you are informed that a young player is going to be called up. Therefore, the best approach for ensuring everyone knows and understands their responsibilities when a young player is called up is to ensure that as CWO/DSO you address this issue during an in-house safeguarding training session.

Through well planned training and using this guidance as part of a club education programme, you should be better prepared for last minute confirmations of call-up which may occur a couple of days before an important game.

When delivering training, the key message would be:

a) Young players U18 are defined in law as children and adults working with children need to not only protect those young players, but to also demonstrate standards of behaviour which do not leave the adults open to allegations against themselves.

- b) If the game involves away travel, players U18 should be in a hotel room alone and should not share with an adult over 18.
- c) An exception to this would be if two U18s are travelling with the team, in which case they can share a room.
- d) Players and staff should not encourage young players U18 to engage in any inappropriate activities such as gambling; the use of alcohol or other inappropriate or illegal substances; or watching or engaging in any inappropriate adult behaviours.
- e) Regardless of what experiences they, as experienced older players, encountered in the past, especially on their debut for the first team, players and all staff should recognise the vulnerability of young players U18 and the risks associated with encouraging young players to engage in inappropriate activities.
- f) It is important to remember that the younger the player, the more vulnerable they will be.
- g) The best way to inspire young players to play well and fulfil their potential is to provide encouragement and praise, especially during times of challenge and anxiety, such as on their debut for the first team. Providing positive role models in the form of more experienced players who demonstrate appropriate behaviour can help the player and the club.

All staff that work with young players are in a position of trust. Young players, parents and carers must have confidence that any professional football club working with children will ensure that they provide a professional, trained workforce that understand their roles and responsibilities when working with U18s.

Planning and preparing for the time when U18s will be called up for a first team or senior appearance can only help to provide protection for; the players U18, the senior players, the club, the business and The Brand. It will also provide reassurance for families that their son will be provided with the right guidance and support during his development.

If further clarification on any issue is needed, then please contact:

-Club Welfare Officer: Kevin Bunn - **Contact number:** 07866 535 309

Email Address: Kevin.Bunn@harriers.co.uk

Assistant Club Welfare Officer: Nick Griffiths – **Contact number:** 0771 928 7927

Email Address: safeguarding@harriers.co.uk

-National League DSO: Martyn Cannon - **Contact number:** 07842 429798,

Email: Safeguarding@thenationalleague.org.uk

-County FA DSO: Julie Lymer - **Contact number:** 01905 827137

Email Address: Safeguarding@worcestershirefa.com

Signed: Richard Lane – KHFC Chairman

Dated: 1 August 2024