



Independent
Safeguarding
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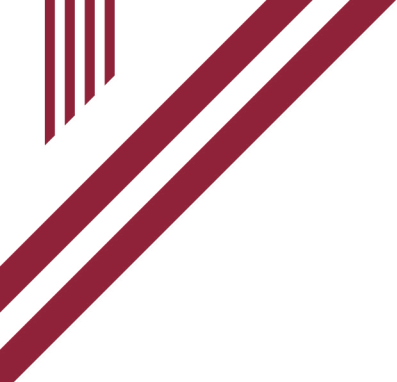
SAFEGUARDING POLICY & PROCEDURES

WEST HAM UNITED (WHFC) & WEST HAM UNITED FOUNDATIONS (WHF)

2025/26

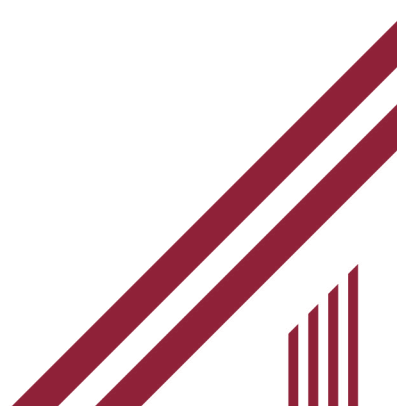
WEST HAM UNITED FOOTBALL CLUB, OLYMPIC PARK, LONDON, E20 2ST, 07801406447

	NAME	DATE
Approved by:	Andy Mollett	August 2025
	Club Board Safeguarding Lead Foundation Board of Trustees (WHF)	August 2025
Last reviewed on:	Jackie Ferdinand Director of Safeguarding & Inclusion	July 2025
Next review due by:	Jackie Ferdinand	July 2026



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PURPOSE & AIMS



- 1.1** The purpose of West Ham United Football Club & West Ham United Foundation's safeguarding policy is to ensure every adult and child is safe and protected from harm. This means we will always work to:
- Protect adults, children and young people from maltreatment.
 - Prevent impairment of adults, children and young people's health or development.
 - Identify adults, children and young people who may be in need of extra help.
 - Ensure that our services assist adult, children and young people to be safe.
- 1.2** This policy will give clear direction to staff, volunteers, those in receipt of our services and parents about expected behaviour and our responsibilities to safeguard and promote the welfare of all adults, children and young people.
- 1.3** West Ham United Football Club & West Ham United Foundation fully recognises the contribution it can make to protect adults and children from harm and supporting and promoting the welfare of those coming into contact with our organisation. The elements of our policy are prevention, protection and support.
- 1.4** This policy applies to all those receiving services from or providing services on behalf of West Ham United Football Club & West Ham United Foundation.

LEGISLATION AND STATUTORY GUIDANCE



This policy is based on the Department for Education's statutory guidance Working [Together to Safeguard Children 2023](#) and the Department of Health and Social Care's [Care and Support Statutory Guidance](#). We comply with the procedures set out by the Local Safeguarding Children Partnerships, and Safeguarding Adults Boards where we deliver our services.

This policy is also based on the following legislation/guidance:

- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- [The Care Act 2014](#), which provides a framework for the care and protection of adults
- [The Rehabilitation of Offenders Act 1974](#)
- [The Protection of Freedoms Act 2012](#)
- [Domestic Violence, Crime and Victims \(Amendment \) Act 2012](#)
- [The Equality Act 2010](#)
- [Mental Capacity Act 2005](#)
- [Sexual Offences Act 2003](#)
- [The Human Rights Act 1998](#)
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#)
- [The Childcare \(Disqualification\) Regulations 2009](#) and [Childcare Act 2006](#)
- [The Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#)
- [What to do if you're worried a child is being abused', DfE \(March 2015\)](#)
- [Information sharing: advice for practitioners providing safeguarding services \(May 2024\)](#)
- [The Revised Prevent Duty guidance](#)
- [Child Sexual Exploitation: A definition and guide for practitioners, local leaders and decision makers DfE \(2017\)](#)
- London Safeguarding Children procedures

DEFINITIONS



Children includes everyone under the age of 18.

Adults includes everyone aged 18 and over.

Safeguarding and promoting the welfare of children and adults means:

- Protecting adults, children and young people from maltreatment
- Preventing impairment of children's or adult's health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all adults and children to have the best outcomes

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child or adult. Somebody may abuse or neglect an adult or child by inflicting harm, or by failing to act to prevent harm. Adults and children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or another child or children.

Neglect is a form of abuse and is the persistent failure to meet a child or adult's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of material substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment).
- Protect a child or adult from physical and emotional harm or danger.
- Ensure adequate supervision (including the use of inadequate care-givers) or
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child or adult's basic emotional needs.

Self-neglect covers a wide range of behaviour: neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

Physical Abuse – includes hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions.



Sexual Abuse – including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

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

Capacity refers to the ability to make a decision at a particular time, for example when under considerable stress. The starting assumption must always be that a person has the capacity to make a decision unless it can be established that they lack capacity under the [Mental Capacity Act 2005](#).

Organisational Abuse – including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going illtreatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

Discrimination – discrimination is abuse, which centres on a difference or perceived difference particularly with respect to race, gender or disability or any of the protected characteristics of the Equality Act.

Financial or Material Abuse – including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Emotional or Psychological Abuse – this includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

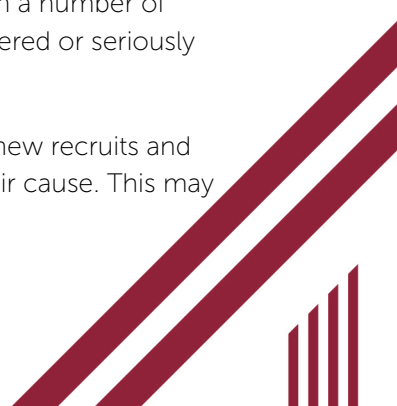
Cyber Bullying - cyber bullying occurs when someone repeatedly makes fun of another person online or repeatedly picks on another person through emails or text messages, or uses online forums with the intention of harming, damaging, humiliating or isolating another person. It can be used to carry out many different types of bullying (such as racist bullying, homophobic bullying, or bullying related to special educational needs and disabilities) but instead of the perpetrator carrying out the bullying face-to-face, they use technology as a means to do it.

Forced Marriage - forced marriage is a term used to describe a marriage in which one or both of the parties are married without their consent or against their will. A forced marriage differs from an arranged marriage, in which both parties consent to the assistance of a third party in identifying a spouse. The Anti-social Behaviour, Crime and Policing Act 2014 make it a criminal offence to force someone to marry.

Mate Crime - a 'mate crime' as defined by the Safety Net Project is 'when vulnerable people are befriended by members of the community who go on to exploit and take advantage of them.

It may not be an illegal act but still has a negative effect on the individual.' Mate Crime is carried out by someone the adult knows and often happens in private. In recent years there have been a number of Safeguarding Adult Reviews relating to people with a learning disability who were murdered or seriously harmed by people who purported to be their friend.

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



EQUALITY STATEMENT



4.1 Some children (and adults) are at increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. West Ham United Football Club & West Ham United Foundation are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face. We recognise the importance of adopting an inclusive approach and maintaining a balance between equality and equity in our decision-making processes.

4.2 We recognise those to be children (and adults) who:

- are disabled or have certain health conditions and have specific additional needs
- have Special Educational Needs (whether or not they have a statutory Education, Health and Care plan)
- have a mental health need
- are young carers
- are showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- are frequently missing/going missing from education, home or care
- have experienced multiple suspensions, are at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- are at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- are at risk of being radicalised or exploited
- have a parent or carer in custody, or are affected by parental offending
- are in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- are misusing alcohol and other drugs themselves
- are at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- are privately fostered

OUR ETHOS



CHILDREN:

- 5.1** The child's welfare is of paramount importance. West Ham United Football Club will establish and maintain an ethos where children feel secure, are encouraged to talk, are listened to and are safe. Children will be able to talk freely to any member of staff if they are worried or concerned about something.
- 5.2** Everyone who comes into contact with children and their families has a role to play in safeguarding children. We recognise that staff at West Ham United Football Club play a particularly important role as they are in a position to identify concerns early and provide help for children to prevent concerns from escalating. All staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members must always act in the best interests of the child.
- 5.3** All staff and regular visitors will, through induction and training, know how to recognise emerging needs and indicators of concern, how to respond to a disclosure from a child and how to record and report this information. They will not make promises to any child and will not keep secrets. Every child will know what the adult will have to do with any information they have chosen to disclose should it outline a safeguarding concern.
- 5.3 a** Involving children and young people in decision-making, planning and hearing their voices is an integral part of creating a safe culture in a club or activity. Children and young people have a right to be engaged and have their say on decisions that directly affect them. West Ham Football United & West Ham United Foundation Safeguarding and all those responsible for children's and young people's welfare will work in a fashion that enables their voice, views and experiences to influence and contribute to appropriate and relevant planning and decision making.

In the pursuit of working to keep every child safe, it is crucial to provide young people with the opportunity to express their views, make changes in their community and take responsibility for decisions that affect their lives. In addition, feedback will be collected regularly by staff and shared with the Safeguarding team for reporting and analysis purposes to ensure the ongoing strengthening of safeguarding arrangements and provisions.

ADULTS:

- 5.4** West Ham United Football Club supports the six principles of adult safeguarding as outlined by [The Care Act 2014](#). These principles underpin our safeguarding policy in relation to adults.

Empowerment - People being supported and encouraged to make their own decisions and informed consent.

"I am asked what I want as the outcomes from the safeguarding process and these directly inform what happens."



Prevention – It is better to take action before harm occurs.

“I receive clear and simple information about what abuse is, how to recognise the signs and what I can do to seek help.”

Proportionality – The least intrusive response appropriate to the risk presented.

“I am sure that the professionals will work in my interest, as I see them and they will only get involved as much as needed.”

Protection – Support and representation for those in greatest need.

“I get help and support to report abuse and neglect. I get help so that I am able to take part in the safeguarding process to the extent to which I want.”

Partnership – Local solutions through services working with their communities.

Communities have a part to play in preventing, detecting and reporting neglect and abuse

“I know that staff treat any personal and sensitive information in confidence, only sharing what is helpful and necessary. I am confident that professionals will work together and with me to get the best result for me.”

Accountability – Accountability and transparency in delivering safeguarding.

“I understand the role of everyone involved in my life and so do they.”

5.5 All adults, regardless of age, ability or disability, gender, race, religion, ethnic origin, sexual orientation, marital or gender status have the right to be protected from abuse and poor practice and to participate in an enjoyable and safe environment.

5.6 West Ham United Football Club will seek to ensure that we are inclusive and make reasonable adjustments for any ability, disability or impairment, we will also commit to continuous development, monitoring and review.

5.7 The rights, dignity and worth of all adults will always be respected.

5.8 We recognise that ability and disability can change over time, such that some adults may be additionally vulnerable to abuse, for example those who have a dependency on others or have different communication needs.

5.9 We recognise that a disabled adult may or may not identify themselves or be identified as an adult ‘at risk’.

5.10 We all have a shared responsibility to ensure the safety and well-being of all adults and will act appropriately and report concerns.

5.11 At all times we will work in partnership and endeavour to establish effective working relationships with parents, carers and colleagues from other agencies in line with [Working Together to Safeguard Children 2023](#), [Care and Support Statutory Guidance](#), and the London Safeguarding Children Procedures.



ROLES & RESPONSIBILITIES



ROLES	NAME	CONTACT DETAILS
Designated Safeguarding Lead (DSL)	Jackie Ferdinand	07801406447 jferdinand@westhamunited.co.uk
Senior Lead for Safeguarding	Andy Mollett (Club)	0208 548 2768 amollett@westhamunited.co.uk

6.1 It is the responsibility of every member of staff and regular visitor to ensure that they carry out the requirements of this policy and, at all times, work in a way that will safeguard and promote the welfare of all children and vulnerable adults. This includes the responsibility to provide a safe environment.

The Senior Lead for Safeguarding

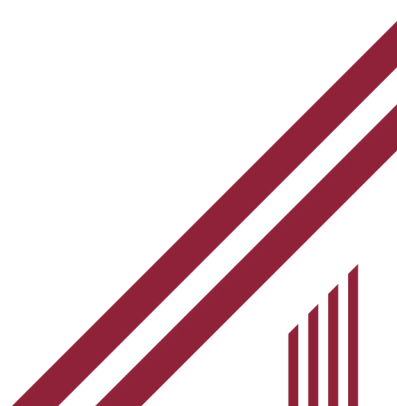
6.2 The Senior Lead for Safeguarding at West Ham United Football Club is accountable for ensuring the effectiveness of this policy and our compliance with it.

6.3 The Senior Lead for Safeguarding will ensure that:

- The safeguarding policy is in place and is reviewed annually, is available to the public and has been written in line with statutory guidance and the requirements of Newham Safeguarding Children Partnership and Adults Board's procedures.
- A senior member of staff is designated to take the lead responsibility for safeguarding.
- All staff receive a safeguarding induction and are provided with a copy of this policy and the staff code of conduct.
- All staff undertake appropriate safeguarding training relevant to their role.
- Procedures are in place for dealing with allegations against members of staff and volunteers who work with children in line with statutory guidance.
- Safer recruitment practices are followed to prevent individuals who may pose a risk to children from having access to children within the organisation.
- Any weakness with regard to safeguarding arrangements that are brought to their attention will be remedied without delay.
- Policies and procedures, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff.

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- All staff and volunteers feel able to raise concerns about poor or unsafe safeguarding practice and such concerns are addressed sensitively in accordance with agreed internal procedures.
 - Liaison will take place with the Designated Officer for the Local Authority (commonly known as 'LADO') in the event of an allegation of abuse being made against a member of staff where their role involves working with children.

The Designated Safeguarding Lead (DSL)

- 6.4** The Designated Safeguarding Lead is a member of staff who takes lead responsibility for safeguarding and child protection at West Ham United Football Club. The DSL will carry out their role in accordance with the responsibilities outlined in [Working Together to Safeguard Children 2018](#).
 - 6.5** The DSL will provide advice and support to other staff. Any concern for a child/adult's safety or welfare will be recorded in writing and given to the DSL.
 - 6.6** During opening hours, the DSL and/or a deputy will always be available for staff to discuss any safeguarding concerns. If a DSL is not available in person, we will ensure that they are available via telephone and/or any other relevant media.
 - 6.7** Through appropriate training, knowledge and experience our DSL will liaise with Police, Adult's or Children's Services where necessary, and make referrals of suspected abuse.
 - 6.8** The DSL will maintain written records ensuring that they are kept confidential and stored securely.
 - 6.9** The DSL is responsible for ensuring that all staff members and volunteers are aware of our policy and the procedure they need to follow. They will ensure that all staff, volunteers and regular visitors have received appropriate safeguarding information during induction and that appropriate training needs are identified.
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CONFIDENTIALITY



A. The Data Protection Act 2018 controls how personal information is used by organisations, businesses or the government and is the UK's implementation of the General Data Protection Regulation (GDPR). For a guide to GDPR see General Data Protection Regulations (GDPR)

B. The DPA (2018) does not prevent the sharing of information for the purposes of keeping children or adults safe from harm. Fears about sharing information must not be allowed to stand in the way of the need to protect children or adults.

C. It is the expectation of our safeguarding policy that any safeguarding concerns should be shared with the Designated Safeguarding Lead who will then make a decision about wider information sharing based on the government's Information sharing: advice for practitioners providing safeguarding services (May 2024).

D. When deciding whether information needs to be shared within our organisation or with other agencies, staff should take account of the following principles, bearing in mind that the most important consideration is whether sharing information is likely to support the safeguarding and protection of a child and adults:

- Necessary & Proportionate
- Relevant
- Adequate
- Accurate
- Timely
- Secure
- Recorded

E. Staff should consider when they share information, who they share it with, how much they share, and where possible they should be transparent about the fact that they're sharing. It is important to acknowledge that sharing of information could be essential for the protection of the child and adult.

F. Although the process for deciding whether to share information is the same within and outside an organisation, in terms of proportionality and the need to know, sharing information (and the decisions around it) with staff from other agencies needs to be documented. It is reasonable for staff to discuss day-to-day concerns about children and adults with colleagues in order to ensure that children's general needs are met. However, staff should report all child and adult protection and safeguarding concerns to the DSL or, in the case of concerns about the DSL to the Registered Manager. The person receiving the referral will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

G. The DSL will normally obtain consent from parents/carers to share sensitive information with outside agencies. Where there is good reason to do so, the DSL may share information without consent, and will record the reason for not obtaining consent. If any member of staff receives a request from a parent/carer to see child protection records, they will refer the request to the data protection officer.

CONFIDENTIALITY



H. Every effort will be made to prevent unauthorised access to sensitive information. Portable devices such as mobile phones, laptop computers, tablets or on portable media will be kept confidential through encryption / using cloud storage / with two-stage authentication. Devices will be kept in locked storage when not in use.

I. If a victim asks the organisation not to tell anyone about sexual violence or sexual harassment:

- Staff may still lawfully share it if there's another legal basis under the UK GDPR that applies.
- The DSL will have to balance the victim's wishes against their duty to protect the victim and other children.

J. The DSL should consider that:

- Parents or carers should normally be informed (unless this would put the victim at greater risk)
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to the relevant Local Authority Children's Social Care department.
- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains.

K. Regarding anonymity, all staff will:

- Do all they reasonably can to protect the anonymity of any children involved in any report of abuse or neglect, for example, carefully considering which staff should know about the report, and any support for children involved.
- Consider the potential impact of social media in facilitating the spreading of rumors and exposing victims' identities.

L. The government's Information sharing: advice for practitioners providing safeguarding services (May 2024) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information. If staff are in any doubt about sharing information, they should speak to the DSL (or deputy).

TRAINING & INDUCTION



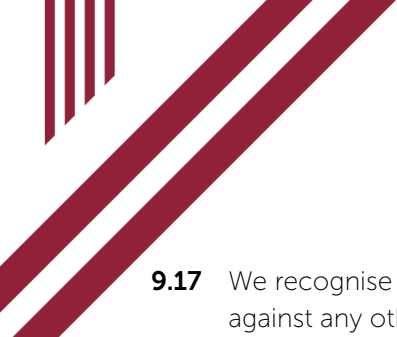
- 8.1** When new staff join our organisation, they will be informed of the safeguarding arrangements in place. They will be given a copy of West Ham United Football Club's safeguarding policy along with the staff code of conduct and told who our Senior Lead for Safeguarding and Designated Safeguarding Lead (DSL) are. All staff are expected to read these key documents.
- 8.2** Every new member of staff or volunteer that comes into regular contact with children and vulnerable adults will receive safeguarding training during their induction period. This programme will include information relating to how to manage a disclosure from a child, how to record concerns, and the remit of the role of the DSL. The training will also include information about whistle-blowing in respect of concerns about another adult's behaviour and suitability relating to their work with children and/or vulnerable adults.
- 8.3** Guidance about acceptable conduct will also be given to all staff during induction. These are sensible steps that every adult should take in their daily professional conduct with children. All staff are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.
- 8.4** In addition to the safeguarding induction, we will ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities. In order to achieve this we will ensure that:
- All staff members undertake appropriate safeguarding training based on their role
 - All staff members receive safeguarding updates (for example, via email, e-bulletins, staff meetings), as required to provide them with the relevant skills and knowledge to safeguard children effectively
- 8.5** All regular visitors, temporary staff and volunteers will be given a set of our safeguarding procedures. They will be informed of whom our Senior Lead for Safeguarding, DSL and what the recording and reporting system is.
- 8.6** We actively encourage all of our staff to keep up to date with the most recent local and national safeguarding advice and guidance accessible via Newham Safeguarding Children Partnership and Adults Board.
- 8.7** Our Senior Lead for Safeguarding will also undertake appropriate training to ensure they are able to carry out their duty to safeguard all of the children or vulnerable adults coming into contact with West Ham United Football Club & West Ham United Foundation.

PROCEDURES FOR MANAGING PATHWAYS TO HELP AND SUPPORT



- 9.1** West Ham United Football Club adheres to safeguarding procedures that have been agreed locally with Newham Safeguarding Children Partnership and Adults Board. Where we identify vulnerable adults or children and families in need of support, we will carry out our responsibilities in accordance with Newham Safeguarding Children Partnership and Adults Board guidance.
- 9.2** Every member of staff (including volunteers) working at West Ham United Football Club are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child or vulnerable adult, staff members should always act in the interests of the child or vulnerable adult and have a responsibility to take action as outlined in this policy.
- 9.3** All staff members are encouraged to report and record any worries and concerns that they have and not see these as insignificant. On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse. More often however, worries and concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on worries and concerns in accordance with this policy to allow the relevant authorities to build up a picture and intervene with support at the earliest opportunity. A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.
- 9.4** It is not the responsibility of staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and pass the information on in accordance with the procedures outlined in this policy.
- 9.5** The DSL should be used as a first point of contact for worries, concerns and queries regarding any safeguarding concerns at West Ham United Football Club. Any member of staff or visitor who receives a disclosure of abuse or suspects that a child or vulnerable adult is at risk of harm must report it immediately to the DSL. In the absence of a DSL, the matter should be brought to the attention of the Senior Lead for Safeguarding.
- 9.6** All concerns about a child or vulnerable adults should be reported without delay and recorded in writing using the agreed procedures.
- 9.7** Following receipt of any information raising concern, the DSL will consider what action to take. All information and actions taken, including the reasons for any decisions made, will be fully documented.

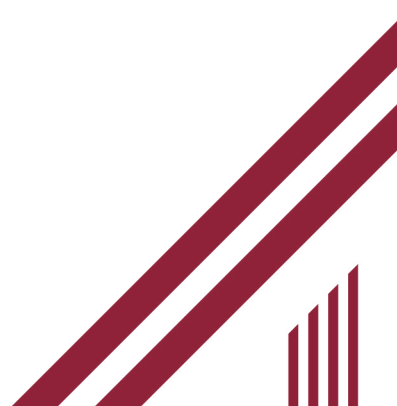
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- 9.8** The DSL will decide whether to make a referral to the Police, Adults or Children's Services when there are safeguarding concerns.
- 9.9** If a referral to Adults or Children's Services has not met the threshold for support or statutory intervention, the DSL will make a full written record of the decision and outcome.
- 9.10** If, at any point, there is a risk of immediate serious harm to an adult or child, a referral should be made to the Police. Anybody can make a referral.
- 9.11** Staff should always follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with Children's Services, Adult's Services or the Police if:
- The situation is an emergency and the DSL and the Senior Lead for Safeguarding are unavailable
 - They are convinced that a direct report is the only way to ensure the adult or child's safety.
- 9.12** Any member of staff who does not feel that concerns about a child have been responded to appropriately and in accordance with the procedures outlined in this policy should raise their concerns with the Senior Lead for Safeguarding. If any member of staff does not feel the situation has been addressed appropriately at this point, they should contact Adult's Services or Children's Services directly with their concerns.
- 9.13** We recognise that children are also vulnerable to physical, sexual and emotional abuse by their peers or siblings. Abuse perpetrated by children can be just as harmful as that perpetrated by an adult, so it is important to remember the impact on the victim of the abuse as well as to focus on the support for the child or young person exhibiting the harmful behaviour. Such abuse will always be taken as seriously as abuse perpetrated by an adult and staff must never tolerate or dismiss concerns relating to peer on peer abuse.
- 9.14** We recognise that children and adults with special educational needs and disabilities (SEND) can face additional safeguarding challenges. These additional barriers can include:
- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the adult or child's disability
 - Adults or children with SEND can be disproportionately impacted by issues such as bullying without outwardly showing any signs
 - Communication barriers and difficulties in overcoming these barriers
- 9.15** At West Ham United Football Club & West Ham United Foundation we recognise that our staff are well placed to identify concerns to help prevent child sexual exploitation and have a vital role in identifying signs that sexual exploitation may be taking place. Any staff member that has a concern regarding sexual exploitation should inform the DSL who will liaise with Police and Children's Services.
- 9.16** At West Ham United Football Club & West Ham United Foundation we recognise that our staff may be placed to identify concerns to prevent children from becoming victims of Female Genital Mutilation (FGM) and other forms of so-called 'honour-based' violence (HBV). If staff have a concern regarding a child or adult that might be at risk of HBV they should inform the DSL who will liaise with the Police and Children's Services.
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9.17 We recognise that safeguarding against radicalisation and extremism is no different to safeguarding against any other form of vulnerability in today's society. At West Ham United Football Club & West Ham United Foundation, we will ensure that:

- Through training, staff and volunteers have an understanding of what radicalisation and extremism is, why we need to be vigilant and how to respond when concerns arise.
- The DSL has received relevant training in this area and will act as the point of contact for any concerns relating to radicalisation and extremism.
- DSL will make referrals to Adults and/or Children's Services and will represent our organisation at meetings as required, unless this is done by the Senior Lead for Safeguarding.

9.18 When Dealing with Disagreement and Escalation of Concerns, the DSL or other appropriate member of staff will:

- Contact the line manager in children's social care if they consider that the social care response to a referral has not led to the child being adequately safeguarded and follow this up in writing
 - Contact the line manager in children's social care if they consider that the child is not being adequately safeguarded by the child protection plan and follow this up in writing
 - Use the Local Authority Escalation Policy if this does not resolve the concern
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RECORDS AND INFORMATION SHARING



- 10.1** If staff are concerned about the welfare or safety of any child or vulnerable adult at West Ham United Football Club & West Ham United Foundation, they will record their concern on the agreed reporting procedure. Any worries or concerns should be passed to the DSL without delay.
- 10.2** Any information recorded will be kept in a secure cabinet or electronically. These files will be the responsibility of the DSL/Senior Lead for Safeguarding. The information will only be shared on a basis of 'need to know in the adult's or child's interests' and on the understanding that it remains strictly confidential.

SAFER RECRUITMENT



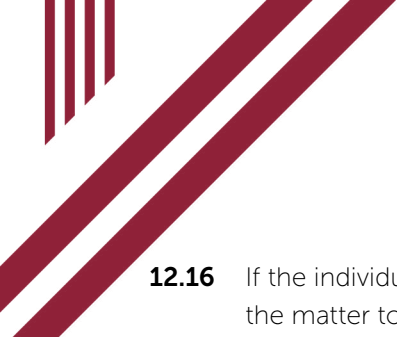
- 11.1** At West Ham United Football Club & West Ham United Foundation we will use the recruitment and selection process to deter and reject unsuitable candidates. We require evidence of original academic certificates. We do not accept testimonials and insist on taking up references prior to interview. We will question the contents of application forms if we are unclear about them, we will undertake Disclosure and Barring Service checks where required to do so and use any other means of ensuring we are recruiting and selecting the most suitable people to work with vulnerable adults or children that receive services from our organisation.
- 11.2** We will maintain a record of all safer recruitment checks carried out in line with statutory requirements.
- 11.3** We will ensure that those responsible for recruiting staff have completed appropriate 'safer recruitment' training. At all times we will ensure that safer recruitment practices are followed in accordance with our statutory requirements.
- 11.4** For those staff and volunteers who have new or historical entries on their DBS that may raise concerns of a safeguarding nature but not exclude them from being able to undertake their role, a risk assessment will be completed and kept on file outlining any measures that will be in place to manage any assessed risk.

MANAGING ALLEGATIONS AGAINST STAFF & VOLUNTEERS



- 12.1** Our aim is to provide a safe environment which secures the wellbeing of children and vulnerable adults in receipt of a service from our organisation. We do, however, recognise that sometimes allegations of abuse are made.
- 12.2** We recognise that allegations, when they occur, are distressing and difficult for all concerned. We also recognise that some allegations are genuine and that there are individuals who deliberately seek to harm or abuse children or vulnerable adults.
- 12.3** We will take all possible steps to safeguard vulnerable adults or children and to ensure that those working for, or on behalf of our organisation, are safe to work with children and vulnerable adults. We will always ensure that the procedures outlined by [Working Together to Safeguard Children 2023](#) and [Chapter 7 of the London Safeguarding Children Procedures](#) are adhered to and will seek appropriate advice from the Designated Officer for the Local Authority where appropriate.
- 12.4** If an allegation is made or information is received about any member of staff (or volunteer) who works with children (both within our organisation or outside our organisation) who has:
- behaved in a way that has harmed a child, or may have harmed a child,
 - possibly committed a criminal offence against or related to a child,
 - behaved towards a child or children in a way that indicates they may pose a risk of harm to children,
 - behaved or may have behaved in a way that indicates they may not be suitable to work with children,
 - behaved in a manner that discriminates against a child on the basis of one or more of their protected characteristics (as defined by the Equalities Act 2010)
- 12.5** The member of staff receiving the information should inform the DSL and/or the Senior Lead for Safeguarding immediately. This includes concerns relating to agency and supply staff, trainees and volunteers.
- 12.6** Should an allegation be made against the DSL, this will be reported to the Senior Safeguarding Lead.
- 12.7** The Senior Lead for Safeguarding will seek advice from the Designated Officer for the Local Authority or Adults Safeguarding Contact for the Local Authority where appropriate within one working day. No member of staff will undertake further investigations before receiving further advice.

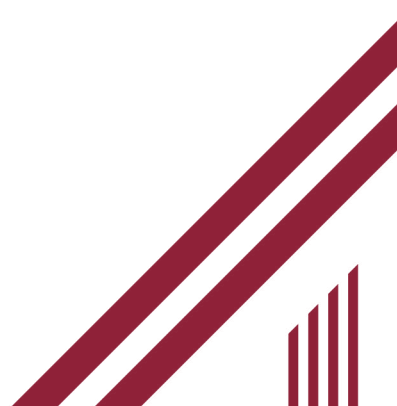
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- 12.8** Any member of staff or volunteer who does not feel confident to raise their concerns within the Organisation should contact the Designated Officer for the Local Authority or Adults Safeguarding Contact for the Local Authority directly.
- 12.9** Suspension of the accused will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable.
- 12.10** Based on an assessment of risk, we will consider alternatives such as:
- Redeployment so that the individual does not have direct contact with the child or children concerned
 - Providing an assistant to be present when the individual has contact with children
 - Redeploying the individual to alternative work so that they do not have unsupervised access to children
 - Temporarily redeploying the individual to another role in a different location
 - We will seek views from our HR Team, the Designated Officer at the Local Authority, as well as the Police and Local Authority Children's Social Care where they are involved
- 12.11** We will provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- 12.12** Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with the LADO)
- 12.13** We will keep parents or carers of any involved child/children involved informed of the progress of the case.
- 12.14** The following definitions are used where there is formal oversight of an investigation by a Designated Officer for the Local Authority:
- **Substantiated:** there is sufficient evidence to prove the allegation
 - **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
 - **False:** there is sufficient evidence to disprove the allegation
 - **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
 - **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made
- 12.15** If the allegation is 'substantiated' and the individual is dismissed or we cease to use their services, or the individual resigns or otherwise ceases to provide their services, insert organisation will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.
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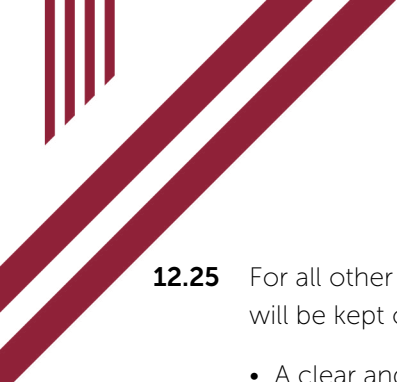
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- 12.16** If the individual concerned is a member of a professional body, we will consider whether to refer the matter to that professional body to consider ongoing suitability.
- 12.17** If the allegation is determined to be 'unsubstantiated', 'unfounded', 'false' or 'malicious', we will consider next steps alongside the DSL where appropriate. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to Local Authority Children's Social Care may be appropriate.
- 12.18** If a child and/or person who has made the allegation has been shown to have deliberately invented the allegation, or made it maliciously, we will consider whether any action is appropriate against the individual(s) who made it.
- 12.19** West Ham United Football Club & West Ham United Foundation will refer to the Disclosure and Barring Service (DBS) any member of staff who has harmed, or poses a risk of harm, to a child.
- 12.20** This referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from our Human Resources department.

Confidentiality and information sharing

- 12.21** We will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.
- 12.22** We will take advice from the LADO, Police and Local Authority Children's Social Care, as appropriate, to agree:
- Who needs to know about the allegation and what information can be shared
 - How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
 - What, if any, information can be reasonably given to the wider community to reduce speculation
 - How to manage press interest if, and when, it arises

Record Keeping

- 12.23** We will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.
- 12.24** The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).
- 



12.25 For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned, with a copy provided to the individual:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future

12.26 We will retain all records related to allegations management at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

12.27 When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious.
- Include substantiated allegations, provided that the information is factual and does not include opinion

Learning lessons

12.28 After any allegations, we will review the circumstances of the case with the LADO to determine whether there are any improvements that we can make to insert organisation's procedures or practice to help prevent similar events in the future.

Non-recent allegations

12.29 Abuse can be reported, no matter how long ago it happened.

12.30 We will report any non-recent allegations made by a child to the LADO.

12.31 Where an adult makes an allegation to us that they were abused as a child, we will report this to the LADO and advise the individual to report the allegation to the Police.



CONCERN OR ALLEGATION THAT MAY MEET THE HARMS THRESHOLD



ALLEGATION

When there is an allegation that any person who works with children, in connection with their employment or voluntary activity, has:

- Behaved in a way that has harmed a child, or may have harmed a child; and/or
- Possibly committed a criminal offence against or related to a child; and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

LOW-LEVEL CONCERN

Does not mean that it is insignificant. A low-level concern is any concern - no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' — that an adult working with children may have acted in a way that:

- Is inconsistent with an organisation's staff code of conduct, including inappropriate conduct outside of work; and
- Does not meet the harm threshold or is otherwise not serious enough to merit a referral to the LADO however, "The evaluation of low-level concerns should always be undertaken in consultation with the LADO" Also The FA needs to be notified of the outcome of an investigation of all low-level concerns, even if the individual remains working at the Professional Club or CCO.

APPROPRIATE CONDUCT

- Behaviour is entirely consistent with the organisation's staff code of conduct and the law.

LOW LEVEL CONCERN POLICY



POLICY SUMMARY

It is essential to recognise that, in practice, different people can use the words 'allegation' and 'concern' interchangeably. Sometimes individuals may shy away from the word 'allegation' and express it as a 'concern' instead. The crucial point is that whatever the language used, the behaviour referred to may, on the one hand, be capable of meeting the harm threshold (and hence be referable), or, on the other, it does not meet the harm threshold (in which case it should be treated as a low-level concern). So, the focus should not be on the language used by the person disclosing it; it should, instead, be on the described behaviour.

This policy offers guidance for staff if they feel they need to share something worrying them about another member of staff who works at West Ham United FC and West Ham United Foundation (WHUFC & WHUF), but unsure whether it is a serious allegation or safeguarding matter. It may just be something that sits slightly uncomfortably with them about a member of staff or something that you feel needs some support and training to prevent them from being in a position that breaches our behaviour policy.

This merely formalises what we already do in WHUFC and WHUF, where we encourage an environment of transparency and openness and recognise our duty to support staff to ensure best practice. In addition, the policy offers guidance on what a low-level concern is; with whom and how to pass on that concern; and information for staff should a low-level concern be raised about them.

THE PURPOSE OF THE POLICY:

This guidance should empower staff to report situations where adults in the WHUFC & WHUF community are not quite "getting it right". This should be regarded as a positive approach for two distinct reasons:

1. To allow for early intervention with staff whose actions or behaviour (deliberate or unwittingly), may be blurring the boundaries of our varying Staff Code of Conduct, Behaviour and Poor Practice Policies, and avoiding things escalating to a more problematic state.

and/or:
2. To allow for the identification of any patterns of low-level concerning behaviour which may place children or adults at risk.
3. Reinforce to staff how key they are in keeping children and 'adults at risk' safe, in addition to reminding staff of their responsibility to report all concerns.

WHAT DOES WHUFC & WHF NEED TO DO?

Given that we engage and oversee work with children, as per Statutory (Working Together to Safeguard Children) and FA and Premier League Rules and Regulations, to be compliant, we must have a low-level concerns policy and procedures as part of our overall safeguarding and child protection policies and procedures. It should be closely linked to the code of conduct for staff and volunteers. In addition, The Safe to Operate (STO) and Compliance (C) Audit requires the Club to satisfy all Criteria set out for the safe operations of a PGA.

There should be transparent processes for sharing and responding to any concerns about an adult's behaviour, no matter how small. A concern can still be significant even if it does not meet the harm threshold.

WHUF & WHUF MUST EVIDENCE TAKING PRECAUTIONS TO ENSURE ADULTS UNDERSTAND:

- What constitutes appropriate and inappropriate behaviour.
- What a low-level concern is.
- The importance of sharing low-level concerns.
- How to report any concerns.
- The process for recording, reviewing and responding to concerns.

This guidance reinforces the robust, transparent and holistic safeguarding culture. This guidance should be read in conjunction with the Managing Allegations Policy (for allegations that meet LADO referral), the Staff Behaviour Policy, and the [Guidance for safer working practice for those working with children and young people in education settings, 2022](#).

HOW DOES A LOW-LEVEL CONCERN POLICY STRENGTHEN EXISTING SAFEGUARDING PROCEDURES AND FURTHER PROTECT CHILDREN, 'ADULTS AT RISK' AND STAFF?

Our aim is to always find additional ways to create, embed and reinforce a culture within our community in which all concerns about adults (including where threshold of allegations is not met) are shared responsibly and with the right person and recorded and dealt with appropriately. In turn it should enable us to identify concerning, problematic or inappropriate behaviour of staff early on, and minimise the risk of abuse.

We aim to ensure that adults working in or on behalf of our organisations are clear of the professional boundaries and act within them in accordance with the ethos and values of the organisation. This should ensure that staff avoid the slippage of boundaries between staff, young people, and 'adults at risk' to safeguard everyone.

To achieve this robust, holistic safeguarding culture, WHUFC and WHUF should:

- Ensure that staff are clear about and confident to distinguish expected and appropriate behaviour from concerning, problematic or inappropriate behaviour – in themselves and others, and the delineation of professional boundaries and reporting lines;
- Empower staff to share any low-level concerns with Safeguarding Managers (DSL), and help all staff to interpret the sharing of such concerns as a neutral act;
- Encourage staff to self-report should they feel their conduct or behaviour may have fallen short of staff conduct policies

- Address unprofessional behaviour and help the individual to correct such behaviour at an early stage;
- Identify concerning, problematic or inappropriate behaviour – including any patterns –to be consulted upon with (on a no-names basis if appropriate), or referred to, the LADO;
- Provide for responsive, sensitive and proportionate handling of such concerns when they are raised; and
- Help identify any weaknesses in WHFC and WHUF safeguarding system.

THE DIFFERENCE BETWEEN AN ALLEGATION AND A CONCERN

It might not be clear whether an incident constitutes an ‘allegation’. It is important to remember that to be an allegation, the alleged incident has to be sufficiently serious as to suggest that harm has or may have been caused harm to a child/ren or that the alleged behaviour indicates the individual may pose a risk of harm to children (or otherwise meet the criteria above). Issues that do not meet this threshold may constitute conduct or disciplinary issues and should be addressed by employers using the appropriate organisational procedures.

LOW-LEVEL CONCERNS REGARDING STAFF BEHAVIOUR:

Definitions:

Staff should be interpreted very widely to mean any adult associated with or working with WHUFC or WHUF, whether engaged as a paid employee, worker or self-employed contractor or unpaid member of staff or volunteer or a Board Trustee/ Member.

This guidance is in reference to the behaviour of a member of staff that is below the threshold for a referral to the LADO and is considered a low-level concern. KCSIE 2022 states that the term “low-level concern” (sometimes referred to as neutral notifications) does not mean that it is insignificant:

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a “nagging doubt” – that an adult (member of staff) may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO (KCSIE 2022) (see appendix a).

WHAT IS A LOW-LEVEL CONCERN?

A low-level concern is any concern that an adult has acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- Doesn’t meet the harm threshold or is not considered serious enough to refer to the local authority. However, “The evaluation of low-level concerns should always be undertaken in consultation with the LADO” ([2.1.3 Allegations Against Staff or Volunteers \(People in Positions of Trust\), who Work with Children](#))
- Low-level concerns are part of a spectrum of behaviour. This includes:
- Inadvertent or thoughtless behaviour
- Behaviour that might be considered inappropriate depending on the circumstances
- Behaviour which is intended to enable abuse.

THE DFE RECOGNISE SUCH BEHAVIOURS AS (BUT NOT LIMITED TO):

- Using inappropriate offensive, sexualised or intimidating language
- Being over-friendly with children
- Having favourites or students (young people), developing high-dependency relationships with them
- Taking photographs of children on their personal device
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- A breach of trust or boundaries.

THE FA

To assist the Professional Clubs and CCOs, The FA provides a non-exhaustive list of examples of low-level concerns (see appendix b- The FA Low-Level Concerns)

This guidance distinguishes between the behaviour of low-level concern and that which may meet the harms threshold. Staff do not need to be able to determine in each case whether their concern is a low-level concern or if it is, in fact, serious enough to consider a referral to the LADO or meets the threshold of an allegation. Once staff share what they believe to be a low-level concern, that determination is made by Safeguarding Manager (Designated Safeguarding Lead – DSL).

The FA currently operate under the “3 strike rule” on low-level concerns. This means that where an individual has been investigated for 2 previous allegations of low-level concerns, upon receipt of the 3rd Concern, this should be elevated as a formal referral to the Safeguarding Football Authorities due to the pattern of behaviours forming. (See appendix b – The FA Low-Level Concerns).

HOW CAN SOMEONE SHARE A LOW-LEVEL CONCERN AT WHUF & WHUF?

All low-level concerns should be shared with the Safeguarding Team without delay. (See appendix C for reporting flowchart). This policy forms part of an overall set of policies and procedures that fall under our safeguarding umbrella and are linked to our safeguarding Policy & Procedures.

- The sharing of low-level concerns should be made as soon as reasonably possible, ideally within 24 hours of becoming aware, particularly if this relates to a specific incident.
- If you have concerns about the Director of Safeguarding & Inclusion’s behaviour towards a child or young person, don’t hesitate to contact Newham or your local LADO Services – at 020 3373 38031.
- However, it is essential to note that it is never too late to share a low-level concern.

SELF-REPORTING:

Occasionally a staff member may find themselves in a situation that could be misinterpreted or appear compromising to others. Equally, a member of staff may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standards set out in the Staff Behaviour Policy.

The Safeguarding Policy & Procedures ask all staff to share when they have found themselves in a situation that breaches or could be perceived as breaching the Staff Behaviour Policy. This is also emphasised during the new staff safeguarding induction meeting with Safeguarding Managers (Designated Safeguarding Lead – DSL).



Self-reporting in these circumstances can be positive for a number of reasons: it is self-protective in that it enables a potentially difficult issue to be addressed at the earliest opportunity; it demonstrates awareness of the expected behavioural standards and self-awareness as to

the individual's own actions or how they could be perceived; and, crucially, it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour and no "grey areas" are allowed to develop.

REPORTING A LOW-LEVEL CONCERN ABOUT A MEMBER OF STAFF:

The Safeguarding Policy & Procedures states that we all have a duty to safeguard our students and that they should report any behaviours that breach or are seen to breach. This is also emphasised at the new staff safeguarding induction meeting with the Safeguarding Manager. A reminder about this is given at the start of each season in the staff briefing, and a reminder of how to communicate concerns and that this is handled with discretion.

WHAT IF I NEED TO FIGURE OUT IF SOMETHING IS WORTHY OF REPORTING?

You should still run this past the Safeguarding Team and allow them to make the professional judgement on what information is necessary to record for safeguarding purposes. Every member of staff (including volunteers) working at WHUFC and WHUF is advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.

When concerned about the welfare of a child or adult at risk, staff members should always act in the interests of the child or adult at risk and have a responsibility to take action as outlined among others, in the Club's Safeguarding Policy & Procedures; Managing Reported Concerns and Managing Pathways to Help and Support.

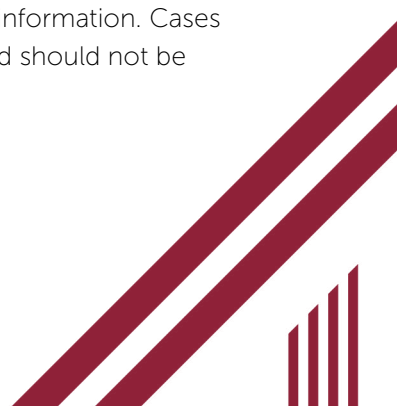
WHAT HAPPENS NEXT?

West Ham United Football Club adheres to safeguarding procedures agreed upon locally with Newham Safeguarding Children Partnership and Adults Board. Where we identify adult at risk or children and families in need of support, we will carry out our responsibilities following Newham Safeguarding Children Partnership and Adults Board guidance and Premier League and FA guidance. (See Reporting of a concern, what happens next?)

RECORDS AND INFORMATION SHARING

Every effort will be made to scan and upload physical evidence onto CPOMS or, where not possible, kept in a secure cabinet. These files will be the responsibility of the Safeguarding Department. The information will only be shared based on the 'need to know in the adult's or child's interests' and the understanding that it remains strictly confidential.

Only Safeguarding and, where appropriate, the Director of HR will have access to this information. Cases in which an allegation was proven to be malicious, false, unsubstantiated or unfounded should not be included in employer references.





REFERENCES

This policy is clear that only substantiated safeguarding allegations will be provided in references. Low-level concerns will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. A low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. Neither should a history of repeated concerns or allegations, which have all been found to be malicious, false, or unsubstantiated, be included in any reference.

However, where a low-level concern (or number of concerns) has met the threshold for referral to the LADO and found to be substantiated, it will be referred to in a reference, provided that the information is factual and does not include opinions.

THIS POLICY SHOULD BE READ IN CONJUNCTION WITH:

- HR Staff Conduct Policy
- Safeguarding & Child Protection Policy
- Managing Allegations Policy
- Part Four KCSIE 2022
- Guidance for safer working practice for those working with children and young people in education settings, 2022

CONTACT DETAILS

Speak to your workplace Safeguarding Manager or any member of the Safeguarding Team. General enquiries Safeguarding@westhamunited.co.uk

THE FA - LOW-LEVEL CONCERNS

To assist the Professional Clubs and CCOs The FA provides a non-exhaustive list of examples of low-level concerns:

- When insufficient care is taken to avoid injuries (e.g. by excessive training or inappropriate training for the age, maturity, experience and ability of players);
 - Allowing abusive or concerning practices to go unreported (e.g. a coach who ridicules and criticises players who make a mistake during a match);
 - Allowing hazing practices to go unreported;
 - Placing children or young people in potentially compromising and uncomfortable situations with adults (e.g. unprofessional use by a coach on social media with young players);
 - Unprofessional use of their own or the Professional Club's social media accounts;
 - Ignoring health and safety guidelines (e.g. wearing seat belts in club transport);
 - Using foul and abusive language to children or other adults (e.g. abusive language towards match officials);
- 

- Giving continued and unnecessary preferential treatment to certain individuals on a regular basis;
- Failure to provide safe and appropriate coaching sessions whilst taking into consideration the ages of the players (e.g. overtraining and exerting undue influence over players);
- Putting performance over the safety of players;
- Lack of respect for other individuals, such as match officials, opposition coaches, players, managers and spectators;
- Allowing rough and dangerous play, bullying, the use of bad language or inappropriate behaviour by players;
- Using punishments that humiliate or harm children;
- Providing one to one coaching without any supervision or the presence of other club officials;
- Allowing children to discriminate on the grounds of religion, race, gender, social class, or lack of footballing ability;
- Failure to encourage children to accept responsibility for their own performance and behaviour;
- Failure to challenge low-level concerns in other Club Officials;
- Allowing allegations of abuse to go unchallenged or unrecorded and failing to report these concerns (e.g. bystanders of abuse);
- Failure to record incidents or accidents;
- Failing to address the additional needs of disabled players or other vulnerable groups;
- Allowing confidential information to be shared inappropriately;
- Failure to respect and listen to the opinions of children and consider the rights and responsibilities of children;
- Smoking and consuming alcohol during coaching sessions;
- Consuming alcohol whilst named on duty on an official club trip;
- Taking children to their own home; and
- Not adhering to guidance when transporting children including travel abroad.

The above list is not exhaustive but should provide guidance of the type of behaviour which constitutes low-level concerns. The Safeguarding Investigations Manager at The FA should always be contacted for advice and guidance on matters of low-level concerns.

LOW-LEVEL CONCERNS, THE FA EXPECTATIONS

The Safeguarding Football Authorities expectation and The FA's policy is that Professional Clubs and CCO deal with matters of low-level concerns in the first instance. When doing so, Professional Clubs and CCOs should also align with the PL and EFL policies and procedures, for instance Codes of Conduct and Recruitment and Selection Policies. Upon receipt of an allegation of a low-level concern, it is that Professional Club or CCO's responsibility to determine the appropriate course of action and then intervene.



SUBMITTING THE LOW-LEVEL CONCERNS INVESTIGATION FORM TO THE FA

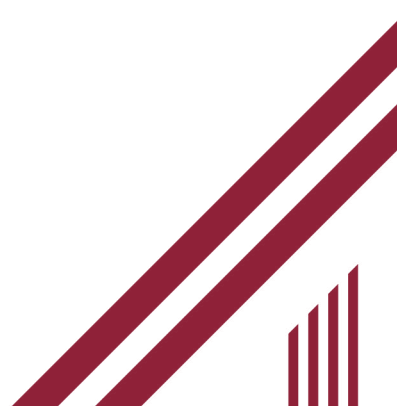
It is not uncommon for individuals to move from different Professional Clubs and CCOs across the country. If low-level concerns are not submitted to The FA, then only the investigating Professional Club or CCO will be aware of the concerns and the outcome. Therefore, when that individual changes Professional Club or CCO their record will be reset. This in turns means that when a Professional Club or CCOs approach The FA on low-level concerns there may not be a previous record of any intervention and the information cannot be shared due a lack of knowledge.

To ensure that all children and adults at risk are robustly safeguarded in football, The FA needs to be notified of the outcome of an investigation of all low-level concerns, even if the individual remains working at the Professional Club or CCO. This will pass the responsibility to The FA to monitor persistent low-level concerning behaviours by individuals and escalate when appropriate. In some situations, the Professional Clubs or CCOs may be notified of multiple low-level concerns in one report. The FA would consider that would be one incident of low-level concerning behaviour and should be addressed and investigated collectively and appropriate and proportionate outcomes determined.

THE FA "3 STRIKE RULE" ON LOW-LEVEL CONCERNS

The FA currently operate under the "3 strike rule" on low-level concerns. This means that where an individual has been investigated for 2 previous allegations of low-level concerns, upon receipt of the 3rd Concern, this should be elevated as a formal referral to the Safeguarding Football Authorities due to the pattern of behaviours forming.

It is advised that when Professional Clubs and CCOs are investigating low-level concerns they should contact the Safeguarding Investigations Manager at the start of the investigation. This will enable The FA to undertake checks on their records to determine if there has been any previous involvement with that individual, either by The FA or a Professional Club or CCO, which may assist on any decision making the Professional Club or CCO may need to make.



SAFEGUARDING REPORTING TEAM CONTACT DETAILS



DIRECTOR OF SAFEGUARDING & INCLUSION (CLUB DSL)

JACKIE FERDINAND

jferdinand@westhamunited.co.uk | 07801 406 447

FOUNDATION (COMMUNITY) HEAD OF SAFEGUARDING & OPERATIONS

CLAIRE PRIDDLE

cpriddle@westhamunited.co.uk | 07711 558 915

MEN'S ACADEMY HEAD OF SAFEGUARDING & WELLBEING

KATE SPENCER

kspencer@westhamunited.co.uk | 07711 560 090

MATCH-DAY & EVENTS HEAD OF SAFEGUARDING

AUSTIN HUGHES

ahughes@westhamunited.co.uk | 07395 261 656

MATCH DAY SAFEGUARDING MANAGER & CLUB WOMEN'S
ACADEMY SAFEGUARDING OFFICER

RUTH KENNEDY

rkennedy@westhamunited.co.uk | 07711 558917

CLUB WOMEN'S TEAM HEAD OF SAFEGUARDING

EMMA COTTIER-SMALL

ecottier-small@westhamunited.co.uk | 07749 947282

FOUNDATION SAFEGUARDING MANAGER

GEMMA CHAFFEY

gchaffey@westhamunited.co.uk | 07702618060

If unsure who to contact, simply contact any member of the team or email:

safeguarding@westhamunited.co.uk

OTHER SAFEGUARDING CONTACTS



LONDON BOROUGH OF NEWHAM - LOCAL AUTHORITY

DESIGNATED OFFICER (LADO)

lado@newham.gov.uk | 020 3373 3803
or contact your local LADO services

PREMIER LEAGUE

safeguarding@premierleague.com | 0207 864 9000

WOMEN'S SUPER LEAGUE FOOTBALL (WSL LEAGUE)

SAFEGUARDING & WELFARE MANAGER

safeguarding@wslfootball.com

CHILD PROTECTION IN SPORT UNIT

thecpsu.org.uk

THE FA

safeguarding@thefa.com | 0800 169 1863

NSPCC HELPLINE

help@nspcc.org.uk | 0808 800 5000

LINKS WITH OTHER POLICIES



This policy forms part of an overall set of policies and procedures that fall under our safeguarding umbrella. Please see below the additional policies that link to our safeguarding practice:

Whistleblowing Policy

Anti-bullying Policy

Code of Conduct

Complaints Policy

Attendance Policy

Managing Allegations and Low-Level Concerns Policy

LOCAL AUTHORITY DETAILS



Multi-Agency Safeguarding Hub (MASH)

Phone: 0208 430 2000 (Monday to Friday, 9am to 5pm)
Out of Hours: 0207 926 5555 (Monday to Friday, 5pm to 9am
weekends and public holidays) All telephone referrals need
to be followed up with a completed form within 24 hours.

Email: mash@newham.gov.uk

LADO Team

Allegations against staff and volunteers (ASV) 0203 3730440

[LADO Referral Form](#)

Phone: 0203 373 3803

Email: LADO@newham.gov.uk

Newham Safeguarding Children Partnership (LSCP)

Email Address: nscpadmin@newham.gov.uk

Prevent

[Prevent referral form](#)

Please ensure the completed form is sent to both MASH@newham.gov.uk and
SO15Mailbox-.PreventNEBCU@met.police.uk