

SAFEGUARDING AND WELFARE POLICY

Introduction/background

1. This policy relates to the Football Foundation (Foundation) and the Football Stadia Improvement Fund's (FSIF) (together the "Foundation") commitments to safeguarding and people protection.
2. The Foundation does not work directly with children and vulnerable adults, however it is committed to proactively safeguarding and promoting the welfare of its ultimate beneficiaries and staff and to taking reasonable steps to ensure those who come into contact with the Foundation funded programmes do not, as a result, come to any harm.
3. This policy relates to the Foundation's commitments to safeguarding, as defined by the Charity Commission, and protecting its beneficiaries. Where any suspected wrongdoing is in relation to staff, the procedure set out in the Foundation's Whistleblowing or Complaints Policy should be followed, as appropriate. Foundation staff and Board members should read this policy in conjunction with its associated Safeguarding and Welfare Procedure and Practice document.
4. Over recent years there has been increasing recognition of the way in which vulnerable people can be at risk of harm from organisations and institutions that are supposed to help them, either as a result of abuse and exploitation by individuals in positions of trust, or via programme activities in general.
5. As a consequence, there has been a significant increase in the efforts made by agencies to ensure that no harm comes to beneficiaries or target communities from contact with their staff and associates or as a result of any of the organisation's activities.
6. This duty of care extends beyond statutory safeguarding requirements. The Foundation takes seriously its obligations to operate in a way that ensures, so far as is possible, that its work does no harm to anyone with whom it engages.
7. Given these values and in light of widely recognised risks, the Foundation has developed this policy to promote protection for all those people it comes into contact with, as well as staff and volunteers within the Foundation itself and the partner organisations with which it has relationships.
8. The Foundation also fully supports the commitments in Affiliated Footballs' overarching Safeguarding Children Policy and Procedures and Grassroots Football's Safeguarding Children, endorsed by the NSPCC,¹ This policy and its associated procedures are intended to be aligned with those policies, however, the Foundation policy and practice will apply in the event of any variance.

¹ These policies and procedures are accessible here: <http://www.thefa.com/football-rules-governance/safeguarding/policy-downloads>

9. Should it come into contact with vulnerable groups (including children), the Foundation takes responsibility to ensure it is doing all it can to protect such groups from all forms of harm, including abuse, neglect and exploitation and to ensure appropriate action is taken if such harm occurs.

Understanding Risks

10. It is clear that vulnerable persons can be harmed, or put at risk of harm, by organisations and institutions, and that abuse of vulnerable groups (including children) can happen in all types of organisations. Such harm may result from unintentional acts or deliberate actions.
11. Unintentional acts may lead to harm due to a lack of 'due diligence' or competence or through organisational negligence, such as inadequate care and supervision, lack of policies, procedures and guidance to inform programming and practice, or lack of staff compliance with legal requirements. Also, deliberate actions may be taken by people with intent to abuse vulnerable people.

Scope of this policy

For Foundation staff and contractors

12. Compliance with this policy is mandatory for all Foundation staff. For the purposes of this policy 'staff' is defined as anyone who works for, or is engaged by Football Foundation, either in a paid or unpaid, full time or part time capacity. This includes directly employed staff, contractors, agency staff, consultants, volunteers, ambassadors, interns and equivalents.

For Board members and Trustees

13. As Board members and Trustees must act at all times in the best interests of the Foundation and its ultimate beneficiaries, they are also expected to comply with this policy. This expectation is made clear to Board members and Trustees through the Trustee induction process and Trustee Handbook.

For partnership organisations

14. The Foundation expects partnership organisations to support the values and commitments set out in this policy. A partnership organisation includes an organisation that receives Football Foundation funding, a programme or project delivery partner or another charity or organisation that is linked to the Foundation through its activities.
15. The Foundation expects and requires partner organisations to act in accordance with the standards set out in this policy, applicable legal requirements and good safeguarding practice. The Foundation recognises that some partner organisations will already have protection policies and associated measures in place. Where this is the case they should have no difficulty in also complying with the standards set out in this policy.
16. The Foundation expects each partner to promptly report to the Foundation, any safeguarding concerns that arise in, or are relevant to, the context of the partnership.

Statement of commitments

17. The Foundation commits to taking reasonable measures to ensure vulnerable groups (including children) impacted by projects and programmes delivered and/or supported by the Foundation are protected as far as possible from harm, including exploitation, neglect and abuse of all kinds.

The Foundation commits to:

- (a) Developing a zero tolerance 'safety culture' within the Foundation that creates and maintains protective environments.
- (b) Placing safeguarding at the heart of recruitment practices by carrying out the appropriate level of DBS or other criminal record checks to which we are entitled, requesting two written references, considering gaps in work history, checking qualifications and certifications and, where appropriate, confirming a person's right to work in the UK.
- (c) Ensuring that Foundation staff and Board members are fully cognisant of protection issues and adhere to the Foundation's Fair Play Policy and Conduct Policy.
- (d) Increasing understanding and raising staff and Trustee awareness of risks relating to safeguarding within the organisation and in connection with its activities.
- (e) Taking appropriate and proportionate action if the policy is not complied with.
- (f) Developing criteria so that staff understand what constitutes non-compliance.
- (g) Carrying out appropriate due diligence on partners, which may include ensuring they have appropriate controls and safeguarding measures in place, and integrating safeguarding and onward reporting requirements in the Foundation's partnership or funding-related agreements.
- (h) Making sure people protection considerations are integrated into all aspects of the organisation.
- (i) Ensuring all staff and Trustees are aware of their responsibilities to report concerns and of steps to take/who to go to in order to report such concerns.
- (j) Ensuring that safeguarding concerns are addressed promptly and through the appropriate channels.
- (k) Reporting safeguarding incidents, allegations or concerns to external authorities and regulators, as appropriate, and in accordance with best practice. The Foundation will fully risk assess such reporting to ensure that making a report is not likely to cause further harm to the individual(s) to whom harm has (actually, allegedly or potentially) already been caused.

- (l) Ensuring that its privacy policy remains suitably updated so that it is clear that, in keeping with the Foundation's zero tolerance policy, it will report wrongdoing on the part of its Trustees, staff and partners to appropriate authorities; will share such information as may be necessary to protect individuals from harm; and will provide fair and accurate references, which appropriately reflect the Foundation's experience and interaction with Trustees, staff and partners.

Embedding organisational commitment

18. In order to make its policy commitments a practical reality, the Foundation will instigate or strengthen a range of measures that focus on making sure this policy and associated procedures are in place, that people are supported to understand and work within the provisions of the policy, that it is fully and effectively integrated into all of our activities, and that it is subject to monitoring and review.
19. Foundation staff and Trustees will receive regular training/briefing on their responsibilities and obligations under this policy and it will form part of the induction for new staff and Trustees.
20. Staff and Trustees will be expected to acknowledge and accept their responsibilities under this policy. Breaches of this policy by staff will be treated seriously and will be treated as a potential cause for disciplinary action or termination of the relationship by other means. Breaches by Trustees may result in the termination of their trusteeship.

Reporting & responding to concerns

21. Foundation staff are required to immediately report any concerns or suspicions of possible/actual harm to a beneficiary, including abuse, exploitation and neglect and policy non-compliance, or risk of such, resulting from action or inaction by anyone covered by this policy. This includes any suspected, alleged or actual historical abuse. In the first instance these should be reported to the Foundation's Lead Designated Safeguarding Officer. Further information on the reporting procedures are contained in the associated Safeguarding and Welfare Procedure and Practice.

The person making the report should otherwise keep the matter strictly confidential and not seek to investigate the incident or suspicion.

22. The Safeguarding Lead Trustee, who sits on the Foundation's Board of Trustees, will have oversight of safeguarding and welfare arrangements and will receive reports of any safeguarding and welfare incidents that arise. The Safeguarding Lead Trustee will have a regular slot at meetings of the Board of Trustees to ensure that Trustees are appropriately apprised of matters that arise.
23. The names of the Lead Designated Safeguarding Officer and Safeguarding Lead Trustee can be found in the 'Contact Information' section at the end of this policy.
24. We are committed to reporting all relevant incidents to the Charity Commission for England and Wales via a serious incident report. We will also report incidents to other regulatory bodies and government departments or funding bodies, where appropriate. Where there is evidence that criminal activity may have taken place, or concerns have been raised in relation

to a child or vulnerable adult, we will report to the relevant police and/or safeguarding authorities as appropriate (for example to the relevant Local Authority Designated Officer (LADO) or Adult Safeguarding Board).

25. Decisions to report to external authorities will be fully risk assessed and anonymisation/pseudonimisation considered when necessary. Reporting will not be avoided on the basis that it may harm the Foundation's reputation or give rise to litigation and any concerns in relation to data protection will not act as a barrier to reporting, although they will be carefully considered to ensure that the disclosure is made within the legal framework for so doing.
26. The Foundation will develop strategies and tools to ensure effective implementation of this policy and to enable the Lead Designated Safeguarding Officer, Board and others to monitor its performance.
27. Existing systems for risk management, due diligence, monitoring and evaluation, audit and review, and any other relevant organisational performance mechanisms will be adapted to include indicators and processes by which implementation of the safeguarding policy can be measured and these processes will be periodically reviewed to ensure that they remain effective and up-to-date in respect of best practice.
28. The Foundation will implement and keep updated a Whistleblowing and a Complaints Policy aimed at encouraging a culture of openness and accountability wherein staff and members of the public are, respectively, confident that they can raise any matter of genuine concern without fear of reprisal in the knowledge that they will be taken seriously and that matters will be investigated appropriately and managed on a need-to-know basis, with appropriate remedial action taken.

Policy Review

29. We are committed to reviewing our policy and good practice regularly. This policy will be reviewed by the Board of Trustees at least annually, when there is a change in law and/or best practice or when an incident occurs that highlights a need for change – whichever occurs first.

Other relevant policies

30. The following policies of the Foundation are or may also be relevant to safeguarding matters:
 - (a) Whistleblowing Policy
 - (b) Complaints Policy
 - (c) HR Recruitment Policy
 - (d) Disciplinary Policy/Procedures
 - (e) Grievance Procedure
 - (f) Fair Play Policy

- (g) Conduct Policy
- (h) Bullying and harassment Policy
- (i) Equal opportunities Policy
- (j) Health and Safety Policy
- (k) Data Protection Policy

Contact information

31. The Foundation's Lead Designated Safeguarding Officer is Jennie Goodman. The Deputy Designated Safeguarding Officer is Dean Potter. There are also a number of Designated Safeguarding Officers.
32. The Football Foundation's Safeguarding Lead Trustee is Charlotte Leslie.
33. The Designated Safeguarding Officers have access to an email inbox for reporting concerns, which is safeguarding@footballfoundation.org.uk.
34. If you are not comfortable with submitting your report via email to that address, please call 0345 345 4555 and ask to speak with the relevant person.
35. Further information on the Designated Safeguarding Officer team and their roles is contained in Annex A to the Safeguarding and Welfare Procedure and Practice document.

Publishing this policy

36. The Football Foundation will ensure that this policy is at all times publicly accessible on its website.

Football Foundation December 2018

This policy will next be reviewed in 1 year