



# SAFEGUARDING POLICY

## Statement of Purpose

1. FC Evolution (the Organisation, we, our or us) is committed to preventing and responding to risks of harm to and promoting the welfare of all children that we work with (i.e. as FC Evolution's clients). These individuals are referred to as the 'Beneficiaries' of this Safeguarding Policy.
2. We recognise the importance of this commitment to safety and welfare and, further, are committed to safeguarding all Beneficiaries without discrimination due to an individual's age, disability, race, religion or belief, sex, gender reassignment, pregnancy or maternity leave status, marriage or civil partnership status, or sexual orientation.
3. This Safeguarding Policy is based on the safeguarding laws of England, Wales, and Scotland, including related guidance issued by the UK Government and relevant governmental departments, agencies, and public bodies. If this Policy is at any time inconsistent with this body of law, FC Evolution will act to meet the requirements of up-to-date safeguarding laws in priority to the requirements set out in this Policy.
4. FC EVOLUTION has implemented this Safeguarding Policy to meet its obligations as an organisation working with children.
5. Any questions in relation to this Policy should be referred to Michael Richardson in the first instance, by emailing [admin@fcevolution.co.uk](mailto:admin@fcevolution.co.uk) or by contacting 07809 908 268.

## Scope of this Safeguarding Policy

6. This Policy explains key aspects of how FC EVOLUTION prevents harm in relation to its Beneficiaries via its practices and its Staff Members' conduct.
7. This Safeguarding Policy covers the organisation and operation of all of FC EVOLUTION's activities involving children (i.e. our Relevant Activities). These primarily include:
  - a. Providing coaching sessions to children in schools and outside school settings
8. This Policy's guidelines and obligations apply to all individuals working for or acting on behalf of FC EVOLUTION in the UK at all levels, including senior managers, officers, employees, consultants, trainees, homeworkers, part-time and fixed-term workers, casual workers, agency workers, volunteers, and interns (collectively 'Staff Members').
9. This Policy does not form part of any contract of employment or similar and FC EVOLUTION may amend it at any time at our absolute discretion.

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## Defining Safeguarding

10. 'Safeguarding' is an umbrella term that refers to work (e.g. practices and procedures) aimed at preventing or responding to harm or risks of harm posed to vulnerable individuals, and at promoting these individuals' wider welfare. Safeguarding is particularly important for children and adults at risk. Most safeguarding legal obligations relate to the care of these groups. This Safeguarding Policy specifically deals with safeguarding children. For safeguarding purposes, children are individuals younger than 18 years old

11. The commitments and practices contained in this Safeguarding Policy apply to the safeguarding of FC EVOLUTION's Beneficiaries from harm caused by either:

- a. The activities and practices of FC EVOLUTION and any conduct of its Staff Members, or
- b. People and situations outside of FC EVOLUTION's and its Staff Members' control, where FC EVOLUTION's Staff Members are aware of, ought to be aware of, or reasonably suspect the risks posed by a situation.

12. FC EVOLUTION understands and aligns with the definition of the HM Government definition of Safeguarding, meaning:

- a. Protecting children from maltreatment.
- b. Preventing impairment of children's health or development.
- c. Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- d. Taking action to enable all children to have the best outcomes.

13. FC EVOLUTION understands that abuse can occur in a variety of ways, this includes but are not limited to:

- a. Physical Abuse: Unexplained bruises, burns, bite marks, frequent injuries, flinching at sudden movements.
- b. Emotional Abuse: Withdrawal, excessive fearfulness, low self-esteem, developmentally inappropriate behaviour.
- c. Sexual Abuse/Exploitation: Age-inappropriate sexual knowledge or behaviour, sudden changes in behaviour, unexplained gifts or money, fear of being alone with certain people, involvement in illegal activities
- d. Neglect: Consistently dirty or hungry, inadequate clothing, untreated medical issues, frequent absence from sessions without explanation.
- e. Child Trafficking: Being moved by unfamiliar adults without clear reason; reluctance to speak; possession of documents not in their control.
- f. Child Labour: Frequent tiredness, work-related injuries, absences due to work, involvement in tasks unsafe or unsuitable for age.

14. For the purposes of this Policy, a 'Safeguarding Concern' is any conduct or situation that is known or reasonably suspected by a Staff Member or another party that risks violating the safeguarding commitments set out above.

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## **Key Measures that FC EVOLUTION is Committed to Implementing and Maintaining to Safeguard its Beneficiaries**

15. Ensuring that Staff Members are trained to, and encouraged to, report any Safeguarding Concerns that they identify. Staff Members will be encouraged to follow FC EVOLUTION's safeguarding reporting procedures as closely as possible when reporting concerns (set out below under the heading 'Procedures: Reporting').
16. Ensuring that all Staff Members listen to all safeguarding-related queries and concerns raised by other Staff Members, Beneficiaries, or relevant other parties, with respect and professionalism. Staff Members should be trained how to, and encouraged to, then assist with reporting any such concerns via FC EVOLUTION's regular reporting procedures.
17. Ensuring that all reported Safeguarding Concerns are dealt with by appropriate individuals and teams and in accordance with FC EVOLUTION's relevant procedures (set out below under the heading 'Procedures: Investigation and Response').
18. Implementing and maintaining comprehensive, accessible, fair, and efficient procedures for Staff Members to use when reporting and dealing with Safeguarding Concerns. These procedures will be made known and easily accessible to all Staff Members.
  - a. Procedures will be designed to ensure all safeguarding issues are dealt with fairly and objectively even when allegations are made against one of FC EVOLUTION's Staff Members. Any such allegations will be treated in a manner that takes into account the gravity of the accusations, but which does not vilify or presume the guilt of an accused individual without a fair investigation.
  - b. Any reports that qualify as protected disclosures under whistleblowing law will be treated securely and in a protected manner in line with whistleblowing law and FC EVOLUTION's Whistleblowing Policy.
19. Appointing Michael Richardson to hold responsibility for managing safeguarding policies and procedures within FC EVOLUTION.
20. Following appropriate recruitment processes when recruiting new Staff Members, including volunteers. This includes:
  - a. Conducting all appropriate pre-employment checks (e.g. Disclosure and Barring Service (DBS) criminal record checks).
  - b. Ensuring new Staff Members take part in, and understand the content of, all necessary safeguarding training before having any contact with FC EVOLUTION's Beneficiaries.
  - c. Following FC EVOLUTION's Recruitment Policy.
21. Providing appropriate safeguarding training for all relevant Staff Members. Every Staff Member should be provided with, and required to undertake, training that is appropriate to their role, responsibilities, and degree and type of contact with Beneficiaries. This should, where appropriate, include training on:
  - a. How to define and identify potential signs of different types of abuse, including physical abuse, emotional abuse, sexual abuse and exploitation, neglect, and others.
  - b. How to listen to and respond to concerns or disclosures about safeguarding issues during an initial conversation (e.g. how to explain when information can and cannot be kept confidential).
  - c. How to use FC EVOLUTION's safeguarding reporting procedures and when doing so is appropriate.

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- d. Which additional resources (e.g. policies, other supporting documents, or external educational resources) are available to ensure Staff Members remain informed about safeguarding.
  - e. Staff will have undergone a Safeguarding Children workshop
22. Ensuring that all information related to Safeguarding Concerns, including the content of reported concerns as well as the personal data of anybody involved, is handled safely and securely. This involves:
- a. Following the requirements set out by the UK's data protection laws, including The UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018.
  - b. Following FC EVOLUTION's data protection policies and procedures, including our Data Protection and Data Security Policy.
  - c. Providing Staff Members with training on data protection and privacy, where appropriate.
  - d. Ensuring Staff Members always have an identifiable point of contact for questions or concerns about data protection and privacy. This is currently Michael Richardson, who can be contacted by emailing michael@mrfa.co.uk or at 01371 829 216.
  - e. Only sharing information about a Safeguarding Concern internally as far as is necessary to manage the concern for the relevant Beneficiary's benefit.
23. Ensuring transparency and awareness regarding safeguarding information and procedures. For example, by:
- a. Providing information to Beneficiaries about our safeguarding procedures so that they are aware of how to raise any concerns.
  - b. Ensuring all Staff Members are aware of safeguarding laws, FC EVOLUTION's safeguarding commitments and procedures, and Staff Members' responsibilities in relation to these.
24. Regularly reviewing all safeguarding policies and procedures to ensure that they are up-to-date with safeguarding law and that they remain suitable for FC EVOLUTION's Relevant Activities and workforce, and meeting any review and evaluation requirements specific to FC EVOLUTION's industry and organisation type.
25. Regularly maintaining DBS records ensuring they are accurate and renewed every three years.

### **Staff Members' Responsibilities**

26. All Staff Members have a responsibility to promote the safety and wellbeing of all of FC EVOLUTION's Beneficiaries. This means that all of FC EVOLUTION's policies and procedures relevant to safeguarding and all UK laws relevant to safeguarding must be followed at all times. Specifically:
27. All Staff Members must contribute to upholding the key measures that FC EVOLUTION has committed to taking to safeguard its Beneficiaries (set out above) to an extent that is appropriate for their role, responsibilities, and degree and type of contact with Beneficiaries. Specific ways that Staff Members should do this will be clarified during training. If a Staff Member is uncertain as to their responsibilities, it is their responsibility to raise this with Michael Richardson.

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28. Staff Members must actively participate in all safeguarding training they are assigned and, if they do not understand any aspects of their training, must raise this with Michael Richardson.
29. Staff Members must never do anything to actively risk the safety or wellbeing of any of FC EVOLUTION's Beneficiaries. This includes, but is not limited to:
  - a. Subjecting them to or facilitating abuse of any sort.
  - b. Engaging in any sexual activity with children (i.e. anybody under the age of 18).
  - c. Participating in or facilitating any activities that may commercially exploit Beneficiaries. For example, failing to report suspected child labour or trafficking.
30. Staff members must maintain professional boundaries in all digital communications with Beneficiaries. This includes:
  - a. Only using approved platforms for all communications (360 Player, official FC Evolution email)
  - b. Never use personal accounts (e.g. WhatsApp, Instagram, Snapchat) to contact Beneficiaries
  - c. Not 'friending' or 'following' Beneficiaries on personal social media accounts
  - d. Ensuring all online communication is transparent, accessible to parents/guardians, and logged where possible.
  - e. Immediately report any inappropriate online contact from Beneficiaries or others to the CWO.
31. Staff Members must report all Safeguarding Concerns, including low-level concerns, that they have regarding Beneficiaries, regardless of whether the concerns relate to potential wrongdoing of other Staff Members, other Beneficiaries, or external parties (e.g. parents, teachers, other organisations, or members of the public).

### **Procedures: Reporting**

29. Staff Members will receive safeguarding training that should enable them to identify Safeguarding Concerns (e.g. suspected abuse, neglect, or threats to wellbeing) relevant to FC EVOLUTION's Beneficiaries.
30. If a Staff Member identifies a Safeguarding Concern, to report it they should:
  - a. Any initial Safeguarding concern will be reported to a staff member's line manager, should this require further escalation they will report to the CWO (Child Welfare Officer)
31. If a Staff Member feels unable to follow the above steps, they should report their Safeguarding Concern in a reasonable alternative manner. This may be the case if, for example:
  - a. Following the above procedure would require disclosing the concern to somebody who is implicated in the Safeguarding Concern or who the Staff Member is otherwise uncomfortable contacting about this concern, or
  - b. The matter is time sensitive and involves a risk of serious harm to somebody, in which case contacting an external agency (e.g. the police, the ambulance service, or a mental health crisis line) or a more senior member of FC EVOLUTION's staff first may be more appropriate.

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## **Procedures: Investigation and Response**

32. Reported Safeguarding Concerns will be dealt with promptly by appropriate individuals within FC EVOLUTION, in accordance with our safeguarding response procedures and safeguarding laws. Details of these procedures are available on request from Michael Richardson.
33. Staff Members who report a Safeguarding Concern will be kept informed about the progression of the matter they reported to an appropriate degree. Note that, depending on the nature of the concern and consequent investigations, some information about matters may be kept confidential and not shared with the reporter.
34. If a Staff Member is found to be in breach of this Safeguarding Policy or safeguarding law in general, they will be treated fairly and in line with FC EVOLUTION's Disciplinary Policy and/or Disciplinary Procedure.
35. Referrals or notifications to external organisations (e.g. police services, local authorities - inclusive of the Local Authorities Designated Officer, or LADO, or regulatory bodies) will be made when, and only when, this is appropriate, and will always be made in accordance with the law (e.g. data protection law).

## **Supporting Documents and Other Protections**

36. FC EVOLUTION has various other documents in place that support this Safeguarding Policy. These include:
- a. Detailed safeguarding investigation and response procedures.
37. This Safeguarding Policy does not cover all of FC EVOLUTION's commitments relevant to protecting its Beneficiaries. We also have other policies in place that protect our Beneficiaries, Staff Members, and/or others. These include:
- a. An Anti-Harassment and Bullying Policy.
  - b. A Whistleblowing Policy.
  - c. A Health and Safety Policy.
  - d. An Equal Opportunities Policy.
  - e. A Recruitment Policy.
  - f. A Data Protection and Data Security Policy.
  - g. A Disciplinary Procedure.
38. All of the policies, procedures, and other documents set out above are available on request from the person within the Organisation responsible for HR matters or via Staff Members' line managers.

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