

Safeguarding Policy

Document Control Sheet

Key Information

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| Title: | Safeguarding Policy |
| Prepared By: | Lesley Spuhler, CEO |
| Authorised By: | Programmes Committee |
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Key Changes

| Date | Summary of Changes | Section Number | Initials |
|-----------|--|----------------|----------|
| Feb 23 | New policy | | |
| July 2024 | Ratification and review updated | Point 6 | |
| Sept 24 | Added FA reference at EFL points of reference through recommendation of PGAAC | | LS |
| Nov 24 | Quality Check and updated definition of Safeguarding, added exploitation reference and definition of exploitation, and early help intervention all in line with changes to KCSIE | | DH |
| Nov 24 | Removed reference to Prevent Policy on page 8 as no separate policy | Page 8 | DH |
| 19/05/25 | New control sheet added and updated. Amended document header | | DH |
| Oct 25 | Ratified by Programmes Committee/Trustees | | JH |
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1. Policy Statement

The Foundation of Light provides a welcoming and inclusive environment where participants feel safe, valued and respected. We work in partnership with SAFC, football and statutory authorities and other partners to promote and protect the safety and welfare of vulnerable groups and to strengthen safeguarding arrangements across all its activities including training and awareness raising.

2. Policy Aim

The FOL acknowledges our duty of care (Care Act 2014) to safeguard and promote the welfare of children and adults at risk, provide help and support to meet the needs of children as soon as problems emerge and protect children from maltreatment, inside or outside the home, including online and is committed to ensuring that safeguarding practice reflects statutory responsibilities and government guidance and complies with EFL, FA and PGAAC best practice requirements.

The FOL acknowledges the need to be alert for early help for a child who is frequently missing/goes missing from education, home, or care, has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit

This policy promotes and prioritises the welfare and interests of children and adults at risk in all circumstances, regardless of age, ability or disability, gender reassignment, race, religion or belief, sex or sexual orientation, or socio-economic background. We acknowledge that some groups, including those with Special Education Needs or disabilities, or those from ethnic minority communities, can be particularly vulnerable to abuse, and we fully accept the responsibility to take reasonable, appropriate steps to ensure their welfare. This policy ensures that all children and adults at risk have a positive and enjoyable experience in a safe environment in which they are protected from harm.

3. Definition of Terms

The term 'child' and 'young person' applies to any person under the age of 18. The term 'adults at risk' applies to a person aged 18 or over who is unable to protect themselves from abuse, neglect, or exploitation. References to 'parents' should be read as parents and carers inclusively. References to 'staff' should be read as staff and volunteers inclusively.

Abuse is any form of physical, emotional or sexual mistreatment, or lack of care that leads to injury or harm.

Physical abuse

Is when someone hurts or harms a child or adult at risk on purpose. Physical abuse can include hitting with hands or objects, slapping, punching, kicking, shaking, throwing, poisoning, burning (NSPCC).

Sexual abuse

Is when a child or adult at risk is forced or tricked into sexual activities. They might not understand that what's happening is abuse or that it's wrong, and they might be afraid to tell someone. Sexual abuse can happen anywhere, and it can happen in person or online. It's never a child's fault they were sexually abused and it's important to make sure children know this (NSPCC).

Emotional abuse

Is any type of abuse that involves the continual emotional mistreatment of a child or adult at risk and it is sometimes called psychological abuse. Emotional abuse can involve deliberately trying to scare, humiliate, isolate or ignore a child or adult at risk (NSPCC).

Neglect

Is the ongoing failure to meet a child or adult at risk's basic needs and is the most common form of child abuse. A child might be left hungry or dirty, or without proper clothing, shelter, supervision or health care. This can put children and young people in danger and it can also have long-term effects on their physical and mental wellbeing (NSPCC).

Exploitation

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology

4. Scope

The policy (and accompanying manual) applies to all employees, Board Members, partners, and volunteers of the Foundation. It also applies to contractors and visitors, not employed by the Foundation but engaged to work with or who have access to Foundation information, for example, computer maintenance contractors, Foundation partners, and consultants working on behalf of the Foundation.

5. Policy Principles**Leadership, Governance and Culture**

The Board has ultimate responsibility for safeguarding within the Foundation of Light (FOL). The designated Trustee for safeguarding is Baroness Estelle Morris.

Safeguarding is a standing item at Board meetings, as part of the Programmes Committee report. The Programmes Committee has delegated authority to critically review the safeguarding arrangements annually and produce an action plan including resource allocation.

The FOL reviews, through a member of the Executive Team, its safeguarding arrangements following:

- (i) significant changes within the FOL
- (ii) significant developments in safeguarding legislation and/or statutory or football authority guidance
- (iii) a safeguarding incident, to minimise the risk of recurrence

In the Club/FOL Service Level Agreement there is a commitment to working together to ensure a collaborative and cohesive approach to safeguarding considering sensitive information and data protection regulations.

Roles and Responsibilities

Everyone must take responsibility for safeguarding. While the Board is ultimately responsible for ensuring that an effective safeguarding policy and procedures are in place, there is a clear expectation that everyone will contribute to the implementation of effective safeguarding arrangements across the FOL.

The FOL CEO has ultimate responsibility for ensuring that appropriate arrangements are in place for the day-to-day management of safeguarding, which is managed through the Assistant Director Compliance with audit delegated to the Programmes Committee.

There is a Safeguarding Lead who is a member of the SLT and a part time Designated Safeguarding Officer (DSO) responsible for leading on the implementation of the safeguarding arrangements and for raising safeguarding awareness within the FOL. There are also Safeguarding Champions throughout the business.

The FOL expects that everyone (and in particular, those with specific strategic and/or operational responsibility for safeguarding) will work together to ensure there is a collaborative, cohesive, multidisciplinary approach to promoting and protecting the safety, welfare and wellbeing of children and adults at risk. There is a Safeguarding Working Group that is made up of the safeguarding leads and the Club's DSO responsible for implementing the action plan.

The FOL has a training plan that monitors and assessment of the skills and experience of its staff and volunteers the includes deploying skilled and experienced personnel to meet the needs of children and adults at risk; recruiting additional personnel with safeguarding skills and experience where required; undertaking performance reviews for staff and volunteers that includes consideration of their safeguarding responsibilities.

Procedures and Practices

The FOL has a safeguarding handbook and supporting procedures. This policy and the handbook set out the FOL's commitment to safeguarding and what it does to protect the safety and welfare of its participants and other stakeholders. The policy is reviewed and approved by the Board at least once every year. The supporting procedures are reviewed and approved on behalf of the Board at least once every year via the Programmes Committee.

The safeguarding policy and procedures are widely promoted, and easily accessible and significant changes are promptly communicated both internally and externally. This is done through email briefings, team meetings, induction materials, staff handbooks, programme and activity materials and publication on the FOL's intranet and website in a variety of accessible formats.

The FOL's risk management policy specifically addresses safeguarding risk at all levels from strategic organisational risks through to risk assessments for particular activities.

The FOL has safer recruitment procedures to prevent unsuitable individuals from working with or having access to or influence over children and/or adults at risk. Performance reviews for HR staff and recruiting managers include assessment of the awareness of the FOLs safer recruitment policies, procedures and expectations, to ensure their consistent implementation.

The FOL complies with the Prevent Duty and is reflected in the FOL's safeguarding procedures.

Educating and Empowering

Children and adults at risk are informed about their rights and everyone is equipped with safeguarding knowledge and skills.

The FOL's induction process for staff, volunteers and Board Members includes safeguarding training. This training is provided immediately, if the position involves direct contact with children and/or adults at risk, and in other cases, within one month of joining the FOL.

There is then ongoing training for all staff, volunteers, and Board Members, which includes annual refreshers; updates on changes to the policy and procedures; after incident reviews to learn from incidents and near-misses and for coaches, the Football Association's (FA) Safeguarding Children Course.

The FOL maintains up-to-date records of safeguarding inductions and ongoing training including dates, attendance and the matters covered on the PeopleHR system. Staff are entitled to supervision sessions.

The FOL informs and educates participants (including children and adults at risk) and their parents/ carers about their right to protection from abuse, exploitation and mistreatment in any form and how to report any concerns, make complaints or seek support and advice. [hyperlink to handbook and leaflet](#). This includes contact details for staff and volunteers with specific operational responsibility for safeguarding (including the DSO) through TV screens and the website.

Programme Delivery

The FOL's activities and services are delivered in a way which protects the safety and welfare of children and adults at risk.

The FOL's safeguarding policy and procedures apply to all services and activities of the FOL which involve engagement with children and/or adults at risk. Where the FOL's programmes and activities are open to children and/or adults at risk, the FOL completes an assessment of safeguarding requirements during the planning phase; has appropriate safeguarding measures in place throughout the delivery of those programmes and activities; considers the effectiveness of the safeguarding measures when reviewing those programmes and activities. When establishing or developing a service, project or activity, the FOL includes safeguarding in the planning process

The FOL's quality assurance measures undertaken by the Assistant Director - Compliance include an assessment of the quality of safeguarding practice and consistency in delivery.

The FOL's relationships with third parties are based on a shared commitment to safeguarding, where relevant, including communication of the FOL's safeguarding policy, procedures and expectations to partners, third parties and suppliers; the assessment of a partner's suitability and the adequacy of its safeguarding policy and practices; and sharing of good practice with peer organisations and partners.

Managing Incidents and Allegations

Concerns and complaints are taken seriously and investigated swiftly. The FOL acts as necessary, including reporting incidents to the relevant authorities where appropriate. Serious breaches will result in mandatory reporting to the applicable statutory body (Police, Local Authority, Children's Services, the FA, the EFL, and/or the Disclosure and Barring Service).

The FOL's safeguarding policy and procedures make specific provision for the management of safeguarding incidents, including concerns, complaints and allegations against staff, volunteers and Trustees (including low-level concerns or near misses). This includes providing support for individuals affected by or reporting concerns and for those subject to a concern or allegation; communication with stakeholders, including where relevant the Charity Commission and consequences for breaches, including disciplinary procedures and dismissals.

The FOL has a case management system (MYConcern) for recording, managing, and reporting on safeguarding incidents.

Listening Culture

The FOL enhances the quality and strength of its safeguarding arrangements by promoting a culture of listening to those who are at risk and respecting their views and wishes.

The FOL's safeguarding policy and procedures require the collection of feedback from Beneficiaries (including children and adults at risk) and their parents/ carers. This feedback is reviewed as part of the FOL's annual review of its safeguarding arrangements.

Equality, Diversity and Inclusion

We will ensure that equality is embedded in all our activities, policies and decisions and will work with our partners to share good practice.

6. Ratification and Review

The Policy will be reviewed annually (or sooner if changes in legislation requires it)

Upon approval of this policy, the safeguarding manual will be reviewed to ensure that it is in line with this policy and with 'Keeping Children Safe in Education (2024)'