

SAFEGUARDING CODE OF CONDUCT

INTRODUCTION

This Safeguarding Code of Conduct (the “Code”) reflects the safeguarding ethos of the Tottenham Hotspur Football and Athletic Co. Limited (trading as “Tottenham Hotspur Football Club”), its Group Companies, Tottenham Hotspur Foundation (a registered charity known as the “Foundation”) and Tottenham Hotspur Women’s Football Club Limited – together the “Club”.

The Club believes that Children and Adults at Risk have the right to take part in Club Activities in an environment which is safe and free from any risk of Abuse and that everyone has a responsibility to promote the welfare of all Children and Adults at Risk, to keep them safe and to practise and operate in a way that protects them.

The Club recognises its moral, legal and regulatory responsibility to safeguard and promote the welfare of all Children and Adults at Risk. Upon that basis, the Club’s approach to safeguarding is underpinned by legislation, statutory guidance, compliance with Football Authority Regulations and current best practice. The board of directors of the Club endorses this Code as part of the Club’s constitution and commitment to safeguard and promote the welfare of Children and Adults at Risk.

This Code outlines the behaviours that the Club expects from all Staff. This Code is intended to help Staff to protect Children and Adults at Risk from Abuse.

DEFINITIONS AND RULES OF INTERPRETATION

The following definitions apply in this Policy:

Abuse: is any form of harm or maltreatment of a Child or Adult at Risk. There are four main types of Abuse: Emotional Abuse, Physical Abuse, Sexual Abuse and Neglect. Other forms of Abuse may include Discriminatory Abuse or Psychological Abuse;

Activity / Activities: face to face/in-person or online activity or series of activities, arranged by or in the name of the Club for or to be attended by Children and/or Adults at Risk;

Adult at Risk: any person aged 18 or over who has needs to care and support (whether or not the Local Authority is meeting any of those needs) and is experiencing, or at risk of Abuse and as a



result of those care and support needs is unable to protect themselves from either the risk of, or the experience of Abuse. This may include people with learning disabilities, sensory impairments, mental health needs, older people and people with a physical disability or impairment. It may also include people who are affected by the circumstances that they are living in, for example, experiencing domestic violence. An individual's level of vulnerability to harm may vary over time depending on the circumstances they are in and their needs at the time;

Bullying: a form of Emotional Abuse whereby a Child / Adult at Risk is discriminated against;

Child/Children: a person under the age of 18;

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 into sexual activity usually in exchange for something the victim needs or wants;

Concern: fear, worry or concern that a Child / Adult at Risk may be at risk of Abuse;

Cyber Bullying: a form of online Emotional Abuse whereby a Child / Adult at Risk is discriminated against;

Data Protection Legislation: all applicable laws relating to data protection, the processing of personal data and privacy, including: the Retained EU law version of the General Data Protection Regulation ((EU) (2016/679)) ("UK GDPR") and the Data Protection Act 2018, the Privacy and Electronic Communications (EC Directive) Regulations 2003 (as may be amended by the proposed Regulation on Privacy and Electronic Communications), and any other data protection and/or privacy legislation applicable in the UK from time to time, (each as amended, updated, replaced or re-enacted from time to time and including all subordinate legislation made from time to time under or giving effect to the same) and references to "controller", "personal data", "special category data", "process", "processing" and "supervisory authority" have the meanings set out in, and will be interpreted in accordance with, such applicable laws;

Discriminatory Abuse: including racist, sexist, that based on a Child's / Adult at Risk's disability or other protected personal characteristic as defined in the Equality Act 2010, as well as other forms of harassment, slurs or similar unfair treatment;



Emotional Abuse:	the persistent emotional maltreatment of a Child / Adult at Risk such as to cause severe and persistent adverse effects on the Child's / Adult at Risk's emotional development;
Extremism:	vocal or active opposition to fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs;
Football Authority Regulations:	the rules and regulations from time to time in force of any Governing Body, national association or league under the auspices of The Football Association and/or the Premier League to the extent that they relate or apply to the Club;
Neglect:	the persistent failure to meet a Child's / Adult at Risk's basic physical and/or psychological needs, likely to result in the serious impairment of the Child's / Adult at Risk's health or development;
Online Safety:	(also known as internet safety, e-safety or cyber safety) refers to the act of staying safe online and the safe and responsible use of technology. This includes the use of the internet and also other means of communication using electronic media, for example social media, text or other messaging applications, gaming devices, email etc.;
Premier League:	professional football's top highest recognised league in England;
Physical Abuse:	a form of Abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a Child / Adult at Risk. Physical harm may also be caused when a parent, or other person with parental responsibility, or carer fabricates the symptoms of, or deliberately induces, illness in a Child / Adult at Risk;
Psychological Abuse:	including Emotional Abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, Verbal Abuse, isolation or withdrawal from services or supportive networks;
Radicalisation:	the process by which a person comes to support or engage with Terrorism and forms of Extremism leading to Terrorism;
Sexual Abuse:	forcing or enticing a Child / Adult at Risk to take part in sexual activities, not necessarily involving a high level of violence, whether or not the Child / Adult at Risk is aware of what is



happening. The activities may involve physical contact as well as non-contact activities, such as grooming. Child Sexual Exploitation is a form of Sexual Abuse;

Staff: any person acting for or on behalf of the Club in an official role whether as an employee, volunteer, casual workers or staff, consultant or otherwise;

Terrorism: an action that endangers or causes serious violence to a person/ people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the Government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause;

The Football Association: the national governing body of football in England; and

Verbal Abuse: verbal maltreatment of a Child / Adult at Risk.

APPLICATION OF THE CODE

This Code applies to all Staff.

All Staff under the jurisdiction of the Club agree to abide by all Club policies and procedures as in place from time to time including this Code.

POWER TO CHANGE, RESCIND OR ADD TO THE PROVISIONS OF THE CODE

In the event an issue arises that is not foreseen in this Code, it will be addressed by the Club in a manner that protects and promotes the objectives identified in this Code.

LAWS

The laws of England and Wales shall apply to this Code.

STAFF RESPONSIBILITIES

In addition to the duties and obligations arising under any other contracts or policies under which they may be subject, all Staff shall:

- a) read, accept and abide by this Code as well as all other Club policies and procedures as in place from time to time;
- b) model good behaviour;
- c) create a safe culture and environment;
- d) challenge all inappropriate behaviour and report any breaches of this Code by other members of Staff;
- e) treating everyone equally, with dignity and respect;



- f) accept the moral, legal and regulatory responsibility to implement the behaviours laid down within this Code, to provide a duty of care for Children / Adults at Risk, to safeguard their wellbeing, and to protect them from Abuse;
- g) respect and promote the rights, wishes and feelings of Children / Adults at Risk;
- h) recognise that some Children / Adults at Risk may face additional barriers to getting help because of additional vulnerabilities which could include their ethnicity, gender, age, religion, disability, sexual orientation, social background or culture. There should be awareness that these characteristics may mean that they are at greater risk of Abuse because of factors such as prejudice, discrimination, reduced ability to resist or report Abuse, communication barriers or myths based on stereotypes; and
- i) respond appropriately to any Concerns in accordance with the Club's policies.

RESPECTING CHILDREN / ADULTS AT RISK

All Staff shall:

- a) listen to and respect Children / Adults at Risk at all times;
- b) value and take Children's / Adults' at Risk contributions seriously, actively involving them in planning activities wherever possible;
- c) respect a Child's / Adult's at Risk right to personal privacy as far as possible; and
- d) if you need to break confidentiality in order to follow the Club's safeguarding procedures, it is important to explain this to the Child / Adult at Risk at the earliest opportunity.

DIVERSITY AND INCLUSION

The Club is committed to safeguarding all Children and Adults at Risk regardless of gender, race, age, ethnicity, ability, sexual orientation, and religious or political beliefs, have equal right to protection from Abuse.

All Staff are expected to:

- a) treat Children / Adults at Risk fairly and without prejudice or discrimination;
- b) understand that Children / Adults at Risk are individuals with individual needs;
- c) respect differences in gender, race, age, ethnicity, ability, sexual orientation, and religious or political beliefs;
- d) challenge discrimination and prejudice; and
- e) encourage Children and Adults at Risk to speak out about attitudes or behaviour that makes them uncomfortable.

DUTY TO REPORT

The Club has a dedicated "Safeguarding Team" with primary responsibility for working with Staff to provide guidance and support in relation to any safeguarding Concerns or queries. Any safeguarding Concern related to a member of Staff's conduct must be reported to a member of the Safeguarding Team immediately and within 24-hours.

It is important that you know whom to contact if you have concerns; The Head of Safeguarding and Welfare is Shauna McAllister, contactable on: shauna.mcallister@tottenhamhotspur.com / 07879 997839. In the Head of Safeguarding



and Welfare's absence, please contact any Safeguarding Manager in the Safeguarding Team via email at: safeguarding@tottenhamhotspur.com or the HR Director.

STANDARDS OF BEHAVIOUR

The Club expect the highest standards of behaviour in promoting and protecting the safety, welfare and wellbeing of Children and Adults at Risk. All Staff should be encouraged to demonstrate exemplary behaviour in order to protect Children and Adults at Risk and to protect themselves from Concerns.

All Staff are required to adhere the Premier League's **Guidance for Safer Working Practice** and/or equivalent regulations as in place from time to time.

All Staff are expected to:

- a) Ensure that the safety, welfare and wellbeing of Children / Adults at Risk underpins all behaviours and actions.
- b) Treat all equally, without prejudice or discrimination, and avoid favouritism.
- c) Ensure that the same standards are applied, regardless of ethnic origin, nationality, race, religion or belief, gender, sexual orientation, age or disability.
- d) Maintain professional boundaries by ensuring that all contact, interactions and communications (face-to-face and online) with Children / Adults at Risk take place in line with this Code and the Club's Online Safety Policy.
- e) Ensure that all are treated with respect and dignity at all times, even if their behaviours are difficult or challenging.
- f) Ensure that in all interactions and communications (online and in person), appropriate professional boundaries are maintained and are in accordance with the Club's Online Safety Policy (link above).
- g) Foster a culture where all are comfortable to raise concerns about inappropriate attitudes and behaviour.
- h) Promote an environment where poor practice is challenged, reported and addressed constructively.
- i) Ensure that all safeguarding Concerns against Staff are taken seriously and acted on.
- j) Attend all safeguarding training delivered by the Club as and when required.
- k) Be aware that behaviour outside work which presents transferable safeguarding risk, breaches of the law and/or this Code and related procedures may result in criminal and/or disciplinary action being taken against them.
- l) Promote relationships that are based on openness, honesty, trust and respect.
- m) Exercise caution when you are discussing sensitive issues with Children / Adults at Risk.
- n) Ensure your contact with Children / Adults at Risk is appropriate and relevant to the nature of the Activity you are involved in.

POSITION OF TRUST

A "Position of Trust" involves a person in a position of authority over another person. Individuals who have responsibility for or authority over a Child / Children are in a position of trust. There is a need to protect Children aged 16 and 17 who, despite reaching the age of



consent for sexual activity, are considered to be vulnerable to Sexual Abuse and exploitation, in defined circumstances. This includes sexual activity and relationships with adults who hold a Position of Trust, responsibility or authority in relation to them and, as a result, have a considerable amount of power and influence.

The power and influence that a member of Staff has over someone cannot be underestimated. It is therefore vital for Staff to recognise the responsibility they must exercise in ensuring that they could not be considered to have abused their positions of trust. Everyone involved in supervising Children should be careful to ensure that the appropriate boundaries remain in their working relationships between themselves and participants.

Within the context of Club football, this position of trust can be compounded by the power of the brand and the ability to provide opportunities and access. Staff must always be mindful of this power differential to ensure that their position is not used for personal advantage or gratification and exercised with responsibility and respect.

Staff are expected to at all times maintain healthy, positive and professional relationships with all Children.

All Staff are in a "Position of Trust" in relation to all Children, participants and players whether or not they are in regulated activity.

- No Staff should engage in sexual relationships with any Child. The Club will consider such action "**gross misconduct**", and this will result in dismissal.
- Under the Sexual Offences Act 2003, it is a sexual offence:
 - o For a person in a **Position of Trust** to have a sexual "relationship" of any nature with a Child (a person under the age of 18), even if the relationship is apparently consensual.
 - o To incite a Child to engage in sexual activity or to be exposed to sexual activity (Sexual Abuse).
 - o To produce, possess, or share a Sexual Abuse image / indecent image of a Child.

Any concerns of these types or any other sexual offences will be referred immediately to the Police and the Local Authority for investigation and proceed with a referral to the DBS Barred List when necessary.

Even where there is no alleged criminal offence, the Club will investigate whether an inappropriate relationship, inappropriate communication or other perceived "grooming" behaviour has been demonstrated by a Staff member.

PROHIBITED BEHAVIOUR

Staff must never:

- Allow Concerns to go unreported.



- Take unnecessary risks.
- Engage in behaviour that is in any way abusive, harmful, negligent or exploitive.
- Make inappropriate promises.
- Use any type of physical punishment.
- Act in any way which may be perceived as threatening, intrusive, intimidating patronizing or belittling.
- Use in appropriate language, including sarcastic remarks, insensitive, derogatory or sexually suggestive comments.
- Engage in any sexual activity, promote or encourage sexual activity, expose Children / Adults at Risk to any form of sexual content / image / activity; any discussions of or relating to sexual activity of any kind must take place within a clear educational context and with the full knowledge of the Club / the Premier League, or within the context of a response to concerns raised and identified.
- Subject anyone to any form of treatment that is harmful, abusive, humiliating or degrading.
- Take, display, distribute or publish (e.g., on social media) any image (photographs or video) of Children / Adults at Risk on their personal devices.
- Follow/friend/subscribe to any social media account of a Child from a personal account or account that is not fully endorsed by the Club.
- Use one's position to gain access to data relating to Children /Adults at Risk, to use to one's own or others' advantage. Such data should only be used or shared with the purpose of protecting and supporting Children / Adults at Risk and to meet their needs.
- Smoke (including vaping or use of e-cigarettes) or be under the influence of alcohol, illegal substances including solvents or drugs in the presence of Children / Adults at Risk, or while carrying out work duties.
- Use Club equipment to access pornography, or use of personal devices to access pornography when on duty.
- Access, make, publish (e.g., online via social media), or distribute illegal Child Abuse / indecent content / images.
- Invite a Child / Adult at Risk known to Staff via work to one's home or attend their home for social reasons. In the event of a pre-existing relationship or reason for this (e.g., the Child or Adult at Risk is related to the member of Staff or is a long-standing family friend), this must be disclosed in the appropriate manner to the Club's HR Team via email to: HR@tottenhamhotspur.com

Find out more about recognising and responding to inappropriate behaviour and Concerns within the Club's Safeguarding Children Policy and Safeguarding.

PHYSICAL CONTACT

Football is a contact sport and many roles within football will require a certain amount of physical contact. In all circumstances where a Child or Adult at Risk initiates physical contact, Staff are expected to sensitively deter the Child or Adult at Risk, helping them to understand the importance of personal boundaries. Should inappropriate contact be initiated by a Child or Adult at Risk, then it must be recorded and reported to the Club's Head of Safeguarding and Welfare immediately and where possible within 24-hours –



safeguarding@tottenhamhotspur.com / shauna.mcallister@tottenhamhotspur.com / 07879 997 839.

Examples of acceptable physical contact:

Staff must always consider what is considered to be “acceptable physical contact” on a case-by-case basis. What is considered appropriate by one person may not be by another. Staff should, therefore, always obtain consent prior to engaging in physical touch.

Many forms of physical contact are positive and encouraging for Children / Adults at Risk. For example:

- Celebrating with a handshake, a high five or a pat on upper back / shoulder area.
- Responding to distress by placing a hand on shoulder.
- Aiding sporting skills instruction / demonstrate the safe use of equipment.
- Preventing an injury or accident.
- Treating an injury and administering first aid.

Sometimes, verbal instruction can be more appropriate than touch.

Examples of unacceptable physical contact:

Some physical touch will feel uncomfortable even if it is considered appropriate. Staff must always consider what children find culturally and personally comfortable and appropriate and not make assumptions.

- Touching chest, waist, thighs, genital areas, buttocks, or any other part of the body that causes distress or embarrassment.
- Any punishing or disciplinary physical contact, such as pushing, grabbing, pulling, poking, hitting.
- Assisting with personal care that can be undertaken independently, for example, dressing or undressing, showering or going to the toilet. All personal care assistance must form part of a plan, as agreed by the Club.
- Any form of sexual touch, activity or intimate relationship with a Child or Adult at Risk with whom Staff come into contact through their role.

In order for physical contact to be safe, it's important that Staff are mindful about the reasons why they are using contact, and must:

- Ensure that physical contact is in the interest of / for benefit of the Child or Adult at Risk.
- Be mindful of any cultural implications of physical contact.
- Explain reasons / ask permission for physical contact, except for in emergencies.
- Avoid unnecessary physical contact.
- Encourage Children / Adults at Risk to voice concerns they have if any physical contact makes them feel uncomfortable or threatened.
- Ensure that Children / Adults at Risk are afforded respect and privacy at all times – especially when changing, dressing, showering, and undergoing any form of personal



- care.
- Ensure that physical contact takes place in an open and public environment and is not in secret / out of sight of others.

BEHAVIOUR MANAGEMENT / PHYSICAL INTERVENTION

Staff may, on occasions, be required to deal with a Child's / Adult at Risk's challenging behaviour. These guidelines aim to promote good practice and to encourage a proactive response to supporting Children / Adults at Risk to manage their own behaviour. They suggest some strategies and sanctions which can be used and also identify unacceptable sanctions or interventions which must never be used by Staff.

These guidelines are based on the following principles:

- a) The welfare of the Child / Adult at Risk is the paramount consideration.
- b) Children and Adults at Risk have a right to be treated with respect and dignity at all times, even in circumstances where they display difficult or challenging behaviour.
- c) All those involved in Activities (including Children / Adults at Risk (where appropriate or otherwise their carer) should be provided with clear guidelines about required standards of conduct, and the Club's process for responding to behaviour that is deemed unacceptable.
- d) Children / Adults at Risk must never be subject to any treatment that is harmful, abusive, humiliating or degrading.
- e) Some children exhibit challenging behaviour as a result of specific circumstances, e.g., a medical or psychological condition, and Staff may therefore require specific or additional guidance. These and any other specific needs the Child / Adult at Risk may have should be discussed with a parent, or other person with parental responsibility or carers and the Child / Adult at Risk in planning for the Activity, to ensure that an appropriate approach is agreed and, where necessary, additional support provided e.g., from external agencies, Children's Social Care services etc.
- f) Every Child / Adult at Risk should be supported to participate and, only in exceptional circumstances where the safety of other participants cannot be maintained, should a Child / Adult at Risk be excluded from Activities.

At times, Staff may need to intervene to prevent harm (by the Child to another or to themselves). De-escalation techniques are preferred, such as using one's own body language within a space alongside verbal instructions, and clearing a space is sufficient.

On occasion, a physical intervention is required. The least amount of physical intervention possible should be used in these instances. No one should ever be subject to any form of treatment that is harmful, abusive, humiliating or degrading.



CREATING SAFE EXPERIENCES

Working together is an underpinning principle of safeguarding.

Staff are expected to engage with the Safeguarding Team at the early planning stages of all Activities for or to be attended by Children and/or Adults at Risk to ensure that safeguarding risks specific to each Activity are fully considered and appropriately managed prior to delivery.

Key principles of planning include:

- Ensuring that no Activity is delivered without the prior knowledge and agreement of the Club.
- Engaging with the Safeguarding Team at the early planning stages of all Activities to ensure that safeguarding risks specific to each activity are fully considered and appropriately managed prior to delivery.
- Include the Safeguarding Team in Activity debriefs to strengthen policies and procedures where necessary.
- The safety, welfare and enjoyment of Children and Adults at Risk must be the primary consideration during the planning, delivery and review of all Activities.
- Engage with the Club's Legal Team prior to processing personal data. This includes but is not limited to: the taking and use of images, video footage, the use of online platforms to communicate with Children and Adults at Risk and to deliver any Activities.

Key considerations:

- Experience and suitability of the Staff involved.
- Assessing the suitability of partners and service providers and the adequacy of their safeguarding and safer recruitment policies and practice.
- Ensuring that contractual agreements address safeguarding and that all those involved understand their respective safeguarding responsibilities.
- Health, safety and safeguarding risks should be identified and mitigated. Risk management plans should be communicated to relevant stakeholders.
- Safe travel and transport arrangements.
- Ensuring that accommodation is in a safe location, is safely managed, of good standard for security, hygiene and first aid.
- Emergency response procedures covering injury, illness, emergency evacuation, missing persons, local services and emergency contacts including emergency consular assistance details when abroad.
- Ensuring that there is adequate insurance cover in place.
- Consent for participation, emergency medical treatment and the use of images/footage.
- Appropriate supervision arrangements and ratios.
- Ensuring that additional vulnerability and needs are carefully considered.
- Codes of conduct for Children and Adults at Risk, staff, partners and spectators.
- Procedures for dealing with challenging behaviour, bullying and peer-on-peer abuse.



- Security and measures to manage the behaviour of spectators.
- Safe dispersal procedures.

These key considerations are not exhaustive however they do give Staff a good framework to build from when planning and delivering Activities in which Children and Adults at Risk participate.

Working together is an underpinning principle of safeguarding so it is important you consult with the Safeguarding Team at the early planning stages of all Activities for support and to ensure that safeguarding risks specific to each Activity are fully considered and appropriately managed prior to delivery.

COMMUNICATION AND ONLINE ENGAGEMENT

Good communication is central to working with Children and Adults at Risk. However, all communication can involve risk and therefore must take place within professional boundaries.

This includes the wider use of technology, for example, mobile phones, email and social media.

While the internet and online platforms offer many benefits and positive opportunities, it is important to be aware of the potential risks faced by Children and Adults at Risk which include, but are not limited to:

- Experiencing Cyber Bullying.
- Being pressured into engaging in risky behaviour.
- Being pressured or coerced into creating sexual images / degrading images.
- Sharing personal information that can identify and locate them online.
- Supporting Extremist ideologies, Radicalisation and Terrorism or to become involved in Terrorism.
- The use of online platforms to take advantage of an imbalance of power to coerce, manipulate or deceive a Child / Adult at Risk into sexual or criminal activity, either online or offline.
- Being exposed to inappropriate or explicit content, for example: extreme views, violence, cruelty to humans and animals, self-harm, pro-suicide content, glorifying activities such as drug taking, sexual abuse and rape.

Expectations from Staff for communications:

- Adhere to this Code, the Club's Online Safety Policy (link above) and any risk assessment, safeguarding protocol or guidance issued from time to time in relation to specific Activities they are involved with.
- Only contact / engage Children or Adults at Risk for professional reasons.
- Only use online communication platforms agreed by the Club.
- Ensure that the same professional standards are adhered to online as in person, including dress.



- When communicating with Children or Adults at Risk online, ensure that the Safeguarding Team determines appropriate level of parental (or other person with parental responsibility) involvement for each online activity.
- If communicating via video, ensure that nothing personal or inappropriate can be seen or heard when delivering activities.
- Consider what is visible on their device, for example, files on desktops, social media accounts, personal information or emails if the Activity involves sharing their screen.
- Familiarise themselves with online platform privacy settings and how to report concerns.
- Never share or request personal information (e.g., mobile number, email, or postal address).

Every effort should be made to maintain confidentiality and guard against publicity while a Concern is being investigated or considered. Apart from keeping the Child, parents or other person with parental responsibility, or carer and accused person (where this would not place the Child at further risk) up to date with progress of the case, information should be restricted to those who have a need to know in order to protect children, facilitate enquiries, manage related disciplinary or legal processes.

Any enquiries made by third parties, including journalists, should be referred to the Legal Team immediately and within 24-hours.

SEXUAL IMAGE SHARING

The Club is committed to ensuring Children / Adults at Risk are protected from the inappropriate use of their images. No images should be taken of Children / Adults at Risk without the necessary consent being obtained first including consent as to how the images will be used, especially if this is on websites and in other publications.

Staff need to be aware that where Children send naked or inappropriate photographs of themselves to other people are actually sending indecent images of Children and are therefore committing a criminal offence. Although a lot of Children may see taking, sharing or receiving images as harmless, this can have a long-term lasting effect including blackmail, Bullying, emotional distress and presents an opportunity for grooming and non-contact Abuse to take place. Consensual image sharing, especially between older Children of the same age, may not be abusive but Children still need to know it is illegal, whilst non-consensual is illegal and abusive.

DATA PROTECTION

It is important to remember that Data Protection Legislation does not prevent the Club from sharing information with relevant agencies, where that information may help to protect a Child or an Adult at Risk.

We must ensure that safeguarding information is stored and handled in line with the provisions of the Data Protection Act 2018 and UK General Data Protection Regulation



(GDPR). This includes processing the personal data of Staff in compliance with Data Protection Legislation whilst dealing with safeguarding Concerns.

We will ensure that any concerns about a Child or Adult at Risk are recorded within 24-hours; accurate and provide a factual and evidence-based account on MyConcern.

Safeguarding records are subject to specific considerations regarding the disclosure provisions in Data Protection Legislation, which means that Children, parents or other person with parental responsibility, or carers and people who are accused of any wrongdoing do not necessarily have an automatic right to access them. If any member of Staff receives a request to be provided with safeguarding records or information, they must refer the request to the Legal Team immediately and within 24-hours.

The Club's Managing Safeguarding Concerns Against Staff Policy explains how the Club will share and retain information relating to safeguarding Concerns.

Further information relating to the Club's data processing for safeguarding purposes is contained in the Club's Managing Safeguarding Concerns Against Staff Policy, Safeguarding Children Policy and Privacy Notice.

SAFER RECRUITMENT

The Club implement safer recruitment and procurement procedures to ensure that all reasonable steps are taken to prevent unsuitable people from working with or having access to Children / Adults at Risk. Staff should ensure that all Safer Recruitment procedures are followed in line with the Club's Safer Recruitment Policy.

ONE-TO-ONE WORKING WITH A CHILD / ADULT AT RISK

Working alone with a Child or Adult at Risk can pose additional risks both to the worker and to the individual in question. Tips to ensure that working alone is safer, include:

- Working in an open and transparent way.
- Avoid over-familiarity and unnecessary physical contact.
- Conduct a risk assessment in relation to the activity.
- Maintain professional boundaries at all times.
- Work in neutral work-related spaces (e.g., not in a Child's home).
- Ensure that meetings and contact by whatever means with Children or Adults at Risk outside agreed working arrangements never take place without the knowledge and agreement of the Club.

Under no circumstances should Staff visit the homes of Children or Adults at Risk with whom they come into contact through their role outside agreed work arrangements. Nor should they invite Children or Adults at Risk to their own home or that of a family member, colleague or friend.



SUPERVISION AND STAFF-CHILD RATIOS

It is important to ensure that, in planning and running Activities, consideration is given to providing an appropriate staffing/supervision ratio of adults to Children / Adults at Risk.

Due to the number of potential variables, it is not possible to recommend “one size fits all” guidance to cover all Activities involving Children / Adults at Risk. There are, however, a number of key considerations that are recommended as good practice:

1. What makes an individual suitable to supervise children?

It is the responsibility of those commissioning, planning or providing Activities to ensure the suitability of those running the Activity.

This includes:

- being appropriately qualified for their role and the Activity;
- being subject to a safe recruitment process, including criminal records checks for eligible roles;
- having insurance appropriate to the Activity; and
- understanding their role and responsibilities.

2. What factors inform appropriate supervision levels?

In the planning of all Activities, and regardless of any other assessments that may be required (for example of equipment or for Health and Safety purposes), a risk assessment should be undertaken which specifically informs decision-making about appropriate supervision levels.

The level of supervision required for different Activities will vary, depending on factors such as:

- the age, needs, abilities and behaviour of Children / Adults at Risk participating.
- experience / competence of Staff involved.
- experience / competence of the Children / Adults at Risk.
- nature and duration of the Activity.
- whether parents, or other person with parental responsibility /carers are present.
- risk assessments and/or information identifying potential behavioural or other issues and risks.

Whatever the recommended ratio of adults to participants is, **a minimum of two adults should be present** when working with or supervising Children.

While the risk assessment may well indicate the need for an enhanced level of supervision and staffing for a particular event, the following table shows recommended adult to child ratios. These are based on Ofsted guidelines.



CHILD'S AGE	NUMBER OF ADULTS	NUMBER OF CHILDREN
0-2 years	1	3
2-3 years	1	4
4-8 years	1	6
9-12 years	1	8
13-18 years	1	10

This ensures at least basic cover in the event of something impacting on the availability of one of the adults during the Activity (e.g., in the event of one participant requiring the attention of an adult during the activity following an accident).

TRANSPORT

Staff must not transport Children / Adults at Risk outside of normal working duties unless in an emergency, or where not to transport them may place them at risk of harm.

All such instances must be recorded and reported to the Safeguarding Team.

Transporting Children and Adults at Risk should take place:

- With consent of parents or other person with parental responsibility / carers.
- Only if it is part of their job role and responsibilities.
- With a roadworthy vehicle, appropriately insured for the commercial transportation of Children / Adults at Risk, ensuring that the maximum capacity is not exceeded.
- Where all arrangements for vehicle, passenger and driver safety are in place, including appropriate licence and insurance documents.
- With a driver who is fit to drive (free from any drugs, alcohol or medication that is likely to impair judgement or ability to drive).
- Ensuring that Children and Adults at Risk occupy the back seats.
- Ensuring that seatbelts are working and are always used.

PHOTOGRAPHY, VIDEO AND LIVE STREAMING

The Club is committed to ensuring Children and Adults at Risk are protected from the inappropriate use of their images. No images should be taken without the necessary consent being obtained first including consent as to how the images will be used, especially if this is on websites and in other publications. There is also a need to ensure consent is obtained from a parent, or other person with parental responsibility or carer in the case of Adults at Risk if they are able to give consent for images to be taken.

Photography, video and live streaming includes the taking of still photographs, filmed and moving images and video recordings by whatever means, and with whatever filters are applied or not applied.



It is important to be aware of safeguarding issues and risks when taking photos of and/or filming Children and Adults at Risk.

These include, but not limited to:

- Increased vulnerability to grooming, particularly when shared alongside information that makes an individual identifiable. This includes personal details, a tag with location information, visual details such as a football kit or school uniform.
- Being identified and traced by estranged parents or other person with parental responsibility, carers or partners, for example, in adoption or domestic violence circumstances.
- Court proceedings and statutory protection measures.
- There may be religious or cultural reasons for choosing not to be photographed, including reasons of so-called honour-based violence.
- Photos and videos, and any comments on them, becoming a part of an individual's public image. This may affect them later in life, for example, it may affect how they see themselves or how they are viewed by others.
- When shared online, images may be copied, downloaded, screenshotted or shared by anyone. These could be adapted for inappropriate use and shared on sites showing abuse images or shared within groups of offenders.
- Breaching of data protection policies and/or Data Protection Legislation.

All Staff are expected to:

- Always adhere to the Club's safeguarding and data protection policies and procedures including any applicable Data Protection Legislation.
- Ensure that no personal data is processed without the knowledge and agreement of the Club.
- This includes but is not limited to: taking images of or recording activities and communicating with Children, Adults at Risk and their parents or other person with parental responsibility/carers.

Staff must never:

- Take or share images or video footage of Children / Adults at Risk, with whom you come into contact through their role, without the knowledge and agreement of the Club and of the Child and their parent or other person with parental responsibility / carer.
- Share images or video footage of Children / Adults at Risk their role brings you into contact with on private social network/media accounts (for example, but not limited to; Instagram, Tik Tok, Facebook, Snap Chat, LinkedIn, etc.).

SELECTION, REWARDS AND GIFTS

It is important to exercise care when selecting Children and Adults at Risk for activities, privileges or rewards to avoid perceptions of favouritism or unfairness. Methods and criteria



for selection should always be transparent and consistently applied with the knowledge and agreement of the Club.

Care should also be taken to ensure that you do not accept any gift that might be construed as a gesture to bribe, groom or lead the giver to expect preferential treatment.

Staff are expected to:

- Ensure that all gifts received or given are immediately recorded and declared to the Legal Team.
- Only give gifts to the Children / Adults at Risk with whom their role brings you into contact with as part of an agreed reward system.
- When giving gifts other than as above, ensure that these are of insignificant value and given to all equally.
- Ensure that you do not behave in a manner which is either favourable or unfavourable to individuals.

ADMINISTERING FIRST AID AND MEDICATION

When administering first aid, Staff should ensure that another adult is aware of the action being taken wherever possible. It is important to understand the extent and limitations of one's role and recognise when an injury requires more experienced intervention.

In circumstances where a Child or Adult at Risk needs medication regularly, a healthcare plan must be established to ensure their safety and protection and to protect the Staff working with them.

- **Children:** a parent, or other person with parental responsibility should be informed when first aid has been administered.
- **Adults at Risk:** carers may be informed, where appropriate, with the consent of the Adult at Risk.

Staff are expected to:

- Ensure that they only perform tasks you have been trained to undertake.
- Always act in the best interests of Children and Adults at Risk.
- Record any administration of first aid or medication.
- Adhere to the Club's policies, procedures, and any healthcare plans.

UPHOLDING THIS CODE

You should always follow this Code and never rely on your reputation or that of the Club to protect you.

If you have behaved inappropriately, you will be subject to our disciplinary procedures. The Club might also make a report to statutory agencies such as the Police and/or the Local Authority Child protection services and The Football Association and Premier League in accordance with the Football Authority Regulations.

If you become aware of any breaches of this Code, you must report them to the Safeguarding Team immediately and in any event within 24-hours.

