



# ISFA Safeguarding Children Policies and Procedures Handbook



## Key Contacts and Links

### Website Links

ISFA Website	<a href="https://www.isfa.org.uk">https://www.isfa.org.uk</a>
Safeguarding Section	<a href="https://www.isfa.org.uk/safeguarding">https://www.isfa.org.uk/safeguarding</a>
Contacts Section	<a href="https://www.isfa.org.uk/contact-us">https://www.isfa.org.uk/contact-us</a>
Complaints Procedure	<a href="https://www.isfa.org.uk/complaints-procedure">https://www.isfa.org.uk/complaints-procedure</a>

### Key ISFA Safeguarding Staff

ISFA Board Safeguarding Champion (BSC) Susannah Abbott	<a href="mailto:susannahabbott@isfa.org.uk">susannahabbott@isfa.org.uk</a>
ISFA Designated Safeguarding Officer (DSO) Sarah Millard`	<a href="mailto:sarahmillard@isfa.org.uk">sarahmillard@isfa.org.uk</a> / <a href="mailto:welfare@isfa.org.uk">welfare@isfa.org.uk</a>
ISFA Senior Safeguarding Lead (SSL) Ian Bent	<a href="mailto:ianbent@isfa.org.uk">ianbent@isfa.org.uk</a>

### Other Contacts

NSPCC FA Hotline (24hrs)		0800 0232642
FA Safeguarding	<a href="mailto:safeguarding@thefa.com">safeguarding@thefa.com</a>	0845 210 8080



## Safeguarding Children Policy Statement

Every child or young person, defined as any person under the age of 18, who plays or participates in football should be able to take part in an enjoyable and safe environment and be protected from abuse. This is the responsibility of everyone involved in football thus every organisation is required to endorse and adhere to ISFA's Safeguarding Children Policy.

ISFA recognises its responsibility to safeguard the welfare of all children and young people by seeking to protect them from abuse and harm. This means creating a safe and inclusive atmosphere where everyone works together to tackle both bullying and discrimination, ensure safer recruitment, and tackle poor practice which leads to harm and reduces equal opportunities.

The term 'children' includes everyone under the age of 18 years. However, a number of participants in ISFA events will be over 18 as there are in the Upper Sixth. ISFA's duty is to promote the welfare and health and safety of all participants in its care, whether they are under or over the age of 18 years.

Best practice in inclusion, Anti-Bullying, equality and the respect agenda are all part of making safer cultures and prevention of harm and abuse. ISFA is committed to working to provide a safe environment for all children to participate in the sport to the best of their abilities for as long as they choose to do so.

The ISFA Safeguarding Children Policy key principles are:

- The child's welfare is, and must always be, the paramount consideration.
- All children and young people have a right to be protected from abuse regardless of their age, gender, disability, culture, language, racial origin, religious beliefs or sexual orientation.
- All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately.
- Working in partnership with other organisations, children and young people and their parents and carers is essential.
- Sound recruitment and selection procedures will help to screen out those who are not suitable to work in football.



- ISFA representative teams must appoint a Pastoral Lead or Welfare Officer
- The safeguarding of children whilst under the supervision of a school is the responsibility of that school as outlined in their governance policies. Safeguarding in schools is underpinned by the relevant DfE Guidance “Keeping Children Safe in Education 2023”, which can be found here: <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

ISFA is committed to working in partnership with the Police, Social Care Departments, and Local Safeguarding Children’s Boards (LSCB) and the Disclosure and Barring Service (DBS) in accordance with their procedures. This is essential to enable these organisations to carry out their statutory duties to investigate concerns and protect all children and young people.

ISFA Safeguarding Children Policy is in response to Government legislation and guidance, developed to safeguard the welfare and development of children and young people. It is noted and accepted that The Football Association’s Safeguarding Children Regulations (see The FA Handbook) applies to everyone in football whether in a paid or voluntary capacity.

ISFA supports The FA’s Whistle Blowing Policy. Any adult or young person with concerns about an adult in a position of trust with football can ‘whistle blow’ by contacting The FA Safeguarding Team on: 0800 169 1863.

By writing to The FA Case Manager at The Football Association, Wembley Stadium, PO Box 1966, London SW1P 9EQ

By emailing [Safeguarding@TheFA.com](mailto:Safeguarding@TheFA.com)

Or alternatively by going direct to the Police, Children’s Social Care or the NSPCC.



## **Internal school football and matches played between schools**

All internal and inter-school football is the responsibility of the relevant school's governance. Safeguarding in school football is underpinned by the Department for Education [‘Keeping Children Safe in Education’ 2023](#)

### **ISFA’s Safeguarding policy and relevant information regarding child welfare.**

ISFA’s Child Welfare and Safeguarding policy refers specifically to ISFA-run activities, during which ISFA staff or volunteers are working. These will include:-

- Representative Football
- ISFA Cup Finals
- ISFA tournaments, festivals and events

At all ISFA Representative Matches, training events and ISFA Development Camps a full risk assessment is completed prior to the event. The risk assessment includes registration arrangements; collection and storage of players’ medical details. Risk assessments are signed off and retained by the Head of Football Operations.

### **Key principles**

- The child’s welfare is, and must always be, the paramount consideration.
- All children and young people have a right to be protected from abuse regardless of their age, gender, disability, culture, language, racial origin, religious beliefs or sexual orientation.
- All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately.
- Working in partnership with other organisations, children and young people and their parents and carers is essential.

The ISFA is committed to working in partnership with the Football Association and therein the Police, Social Care Departments, and Local Safeguarding Children’s Boards (LSCB) in accordance with their procedures. This is essential



to enable these organisations to carry out their statutory duties to investigate concerns and protect all children and young people.

It is essential that everyone is clear about how to report a concern about the welfare of a child or young person. In summary this means following the guidelines set out in the ISFA Safeguarding Children Policy and Procedures.

### **Reporting Concerns**

Safeguarding children is everyone's responsibility. If you are worried about a child it is important that you report your concerns - no action is not an option. If you are worried about a child then you need to report your concerns to ISFA Designated Safeguarding Officer, Sarah Millard - [welfare@isfa.org.uk](mailto:welfare@isfa.org.uk) (07410 920 940).

If the child needs immediate medical treatment take them to a hospital or call an ambulance and tell them this is a child protection concern. Then let the ISFA Designated Safeguarding Officer know what action you have taken.



## **Recruitment of Staff**

### **References**

At least two references will be required for paid staff. One should normally be from the applicant's current or most recent employer. If a reference raises any concern the matter should be referred to the ISFA Welfare Officer.

For part time volunteers, ISFA requires a letter from their Headteacher confirming that they are employed at the school and they are "suitable to work with children" and there are no disciplinary matters to be considered.

Should an individual's DBS check reveal any convictions, ISFA will consider whether the nature of the offence/offences renders the person concerned unsuitable for working with children and young people. In such circumstances, when the nature of any disclosure has to be considered, a risk assessment will be carried out to assess the information contained within the disclosure certificate. The individual may also be asked to attend an interview prior to a recruitment decision being made.

### **Temporary Staff**

If, due to illness or withdrawal, additional staffing help is required at the last moment, the replacement person must sign a 'Self-Declaration Form' where appropriate and, in any case, will not have unsupervised access to children during their time with ISFA.

### **Equal Opportunities, Equality & Diversity**

ISFA is committed to providing equal opportunities for all staff, players and parents.



## Whistleblowing

Whistleblowing refers to making a protected disclosure under the Public Interest Disclosure Act 1998.

By encouraging a culture of openness ISFA wants to encourage staff to raise issues, which concern them at work. Staff have a right and duty to raise matters of concern (high and low level) they may have about the services being offered by ISFA or serious malpractice associated with them.

Staff may be worried that by reporting such issues they will be opening themselves up to victimisation or detriment, or risking their job security, or otherwise. However, all staff are protected by law if they raise concerns in the right way.

Provided they are acting in good faith, it does not matter if they are mistaken. This policy is designed to ensure workers raise concerns properly and to ensure that mechanisms exist in ISFA to ensure that issues raised by staff will be addressed quickly and effectively.

Although this list is not exhaustive, examples of situations in which a disclosure might be made are:

- The committing of a criminal offence.
- Improper conduct or unethical behaviour.
- Low level concerns such as being over-friendly with children; belittling a player or using inappropriate sexualising; intimidating or offensive language

Staff who have any concerns about another member of staff are encouraged to share these with the welfare officer. All concerns will be recorded in writing. The records include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concern is also noted. If the individual wishes to remain anonymous then that should be respected as far as reasonably possible. These records will be kept confidential, held securely and will comply with The Data Protection Act 2018.





## **ISFA Safeguarding Code of Conduct for Staff & Volunteers**

### **Introduction**

The Independent Schools FA takes its role as a provider of football for under-18s very seriously. Their wellbeing is paramount in all decisions taken by us. All children and young people we come into contact with have the same protection regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity.

ISFA also commits to safeguarding adults at risk.

We act in accordance with legislation, statutory guidance and The FA's Policies and Procedures and any associated guidance and we work collaboratively with The FA in relation to concerns about the safeguarding of children or young people or adults at risk.

To whom does this Code of Conduct apply? This Code of Conduct applies to all staff, as safeguarding is everyone's responsibility.

### **Staff obligations**

It is our expectation that all our staff / volunteers sign this Code of Conduct and will at all times act in the best interests of children and young people under the age of 18 and in accordance with The FA's Safeguarding Children Policy and Procedures. The welfare of children and young people must always be paramount.

We also expect our staff to act in the best interests of adults at risk in football and to follow reporting procedures. This includes an expectation that staff / volunteers will:

- Undertake safeguarding education or training required by ISFA;
- Read and comply with The FA's Safeguarding Policies and ISFA's safeguarding procedures for children and adults at risk;



- Obtain and maintain an FA in-date DBS Check (less than three years since the date of issue) if working in regulated activity with under-18s in youth and open-age adult football;
- Act in an appropriate way at all times when in contact with children and young people, and adults at risk whether face to face, via social media, phone or other electronic communications and in line with ISFA's Social Media Policy;
- Recognise the importance of confidentiality when working with children, young people, their families and their data;
- Recognise the importance of confidentiality when working with adults at risk and their data;
- Promptly report any concerns about safeguarding or the protection of children or young people or adults at risk in football to our Designated Safeguarding Officer or the Senior Safeguarding Lead or other nominated person or persons in their joint absence;
- Be familiar with and use the whistle-blowing policy if an ISFA staff/volunteer suspects or believes that safeguarding concerns have not been appropriately addressed by ISFA or The FA;
- Understand that by taking on a role with ISFA (voluntary or paid) ISFA deem you to be in a relationship of trust with under-18 participants and/or adults at risk that you are in contact with through your role. Staff members should be aware of and understand the responsibility that this entails, by undertaking the relevant safeguarding education, as ISFA deems appropriate;
- Act with integrity at all times;
- Seek advice from the Designated Safeguarding Officer or the Senior Safeguarding Lead if you are unsure about any of the above or if you are unsure how to act in any given situation.

Further information and support can be found in:

- Our Staff Handbook;
- The FA's Safeguarding Policies and Procedures;
- The FA's guidance on safer working practice.

Alternatively, if there are any queries or concerns regarding the Code of Conduct or safeguarding generally, they should be directed towards ISFA's Designated Safeguarding Officer or the Senior Safeguarding Lead.



## Anti-Bullying Policy

ISFA's aim is to promote an ethos within a safe environment in which children and young people who attend ISFA activities have a fundamental right to be free from bullying and intimidation in all its forms. This includes cyber bullying. In issuing this policy, ISFA has two main objectives:

1. To encourage ISFA staff working with ISFA to take an active role in combating all forms of bullying .
2. To demonstrate to all ISFA participants that they can rely upon ISFA's support in cases of bullying and that all reported cases are dealt with efficiently, effectively and fairly .

Bullying is the repeated, deliberate attempt by an individual or group to hurt, torment, tease, frighten or upset someone causing him/her to feel intimidated, uncomfortable or unhappy. Bullying may be deliberate or unconscious, open or covert, direct or indirect, an isolated incident or a series of repeated actions. It may also include, in certain circumstances, off-duty conduct.

Bullying is best prevented by staff being alert and aware at all times to ensure that:

1. All participants who take part in ISFA activities are aware that bullying will not be tolerated
2. If bullying is suspected or spotted, it should be addressed immediately in a sensitive manner. ISFA staff should speak to the person/s suspected to be carrying out the bullying. A written record should be made.
3. The person against whom the allegation of bullying has been made should be sensitively questioned. Two members of staff should always be present when questioning takes place, although care should be taken that their presence is not intimidating.
4. If the allegation is serious ISFA's welfare officer must be informed and they will decide whether the participant/s will continue to participate in the ISFA



event. If the allegation is serious and of a suspected criminal nature, external authorities such as the police and social services may be informed.

5. Parents of participants involved in a bullying incident should be informed at the time. The only exception to this would be if the ISFA staff had reason to believe that informing the parents would place their son/daughter in danger or put them at risk of harm.

Bullying is a form of harassment and will not be tolerated by ISFA under any circumstances. Any member of staff who bullies another employee, player, child or young person within the ISFA organisation, will be subject to disciplinary action, in line with ISFA's disciplinary procedures. In serious cases, such behaviour may constitute gross misconduct and result in further action.

## **Abuse**

Child abuse is when a child is intentionally harmed by an adult or another child – it can be over a period of time but can also be a one-off action. It can be physical, sexual or emotional and it can happen in person or online. It can also be a lack of love, care and attention – this is neglect. Children or young people who may be vulnerable are likely to disclose abuse to those they trust and a member of staff's response to a disclosure is crucial.

## **What to do if a child or young person makes a safeguarding disclosure**

### **Stage 1**

Deal with the disclosure as it happens and ensure that the child or young person's immediate needs are met and that they feel supported.

When a disclosure is made, staff should not investigate the disclosure. Staff are not expected to act as a social worker, counsellor, judge, and jury or avenge the abuser; they are however expected to act in the best interest of the child or young person who may be at risk.

Staff must:



- Put their own feelings aside and listen as if the information is not sensational.
- Allow the child/young person to lead the discussion and to talk freely.
- Listen to what the child/young person is saying. Avoid asking leading questions.
- Let them tell you at their own pace. Don't worry if the child/young person stops talking for a while - silences are OK.
- Accept what the child/young person says without challenge.
- Allow the child/young person to talk but protect them from sharing the information with too many other people.
- Provide reassurance that you are taking them seriously.
- Reassure them that they are doing the right thing by disclosing.
- If physical abuse has taken place, staff may observe visible bruises and marks but should not ask a child/young person to remove or adjust their clothing to observe them.
- Tell the child/young person what happens next and who you will contact. e.g. ISFA Welfare Officer, Safeguarding Manager, statutory agencies etc. and that you will support them through that process.
- Respect the confidentiality of the disclosure and do not share the information with anyone other than those who need to know. Those who need to know are those who have a role to play in protecting children/young people.

You must **NEVER** promise to keep the disclosure confidential. It should be explained that the child/young person has done the right thing, who will need to be told and why.

## Stage 2

Once the immediate comfort and safety of the child/young person is secured, a staff member must inform the ISFA DSO or other senior member of staff of the disclosure as soon as possible **If the staff member believes that the child/young person is in immediate danger they should contact a statutory agency such as the police and/or social services. Any staff member can make a referral to social services if they are concerned about the safety of a child.** The ISFA DSO should be informed if any referrals are made.

## Stage 3



After the child/young person has disclosed, the conversation must be documented remembering as accurately as you can, the words and phrases used by the child/young person to describe what has happened to them. Staff must avoid including their own opinions and interpretations of what may have happened.

### **What happens next?**

It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. You should be informed by the ISFA Welfare Officer what has happened following the report being made. If you do not receive this information, you should be proactive in seeking it out.

If you have concerns that the disclosure has not been acted upon appropriately, you should inform ISFA's Board Safeguarding Champion

### **Specific Safeguarding Issues**

If the need arises ISFA will refer to experts and professional organisations (including schools) that are best placed to provide up-to-date guidance and practical support on specific safeguarding issues.

### **Ratios and Supervision of Children**

Any activity undertaken by ISFA will always consider the appropriate number of staff members available depending on the age of the children involved, the degree of risk the activity involves, and whether there are any additional disability needs. The lower the age of the participants, the greater the need for supervision.

Regardless of these ratios a minimum of 2 members of staff or delivery partner will always be available to supervise an activity. At least one member of staff will have a first aid qualification.



For overnight stays, when children are asleep, a minimum of two adults must be present in each building in which children are accommodated, preferably on the same floor level. Staff ratios for residential stays are not prescribed in law. However, for each residential camp ISFA carries out a risk assessment to ensure that there is more than an adequate number of staff present. For each residential camp the participants will be aware of who the designated camp welfare officer is and how to contact them if they have any concerns overnight.

### **Transport**

The nature of ISFA demands that players and staff will require transport to play matches/ attend training sessions or fulfil other commitments.

When transporting players, ISFA will always hire vehicles and use a reputable coach company.

In an emergency staff may need to transport a player in their own vehicle. Where this is the case parent permission will always be sought. The welfare officer would be informed of this.



## Social Media Policy

The following is best practice in relation to social networking.

### Do

- Ensure all the privacy settings are locked so that that the pages are used explicitly for ISFA matters and are not used as a place to meet, share personal details or have private conversations.
- Nominate an official to monitor the social networking page regularly and remove access for anyone behaving inappropriately.
- Make sure everyone knows who is responsible for monitoring the content of the social networking areas and how to contact them.
- Provide all users with The FAs best practice guidance on using social networking sites.
- Gain written parent/carer permission before access is given to U18s.
- Inform the DSO if you have received inappropriate communications online, keeping a record of any inappropriate, threatening or offensive material as this may be needed as evidence.

### Don't

Coaches, managers, referees, medics and club officials should not:

- Accept as a friend, players or referees U18 on social networking sites they are members of or share their own personal social networking sites with children or young people involved in youth football.
- Make contact with children or young people known through football outside of the football context on social networking sites.
- Use internet or web-based communications to send personal messages of a non-football nature to a child or young person.
- Engage in any personal communications, 'banter' or comments.

It is important for staff to maintain professional and personal boundaries in and out of work. As a general policy, communication with children and students representing ISFA who are over 18 is via ISFA through the parent or school/organisation. However, ISFA recognises that direct communication with young people may be required on certain activities for professional and welfare





purposes and in such circumstances the Welfare Officer should be consulted and protocols put in place and appropriate consent obtained from the parent. Staff should not normally have direct personal communication with children or any students representing ISFA (unless a special arrangement has been authorised by the DSO).

Friend requests on social media for personal On Facebook, or any other social media, any requests from children or their parents should be rejected. Concerns arising on social media from children should be directed to the ISFA DSO.



## Photography & Filming Policy

### The use of Photography and Film Images

The vast majority of people who take or view photographs or videos of children do so for entirely innocent and legitimate reasons. Sadly, some people abuse children through taking or distributing images. We must therefore ensure that we have some safeguards in place.

ISFA takes its guidance on the use of images from guidelines issued by The FA. All images are taken by ISFA officials who have been briefed by the Welfare Officer.

Before taking images of children or young people, parental consent is sought in writing at the start of the season or prior to the event. For inter-school matches written confirmation must be sought in advance from all participating schools involved in the match or tournament to ensure that they have parental permission in place, to take pictures of the event. On all occasions school staff should be present when the photographs are taken.

Parents/carers/guardians are responsible for informing ISFA of any change of circumstances within the season which may affect consent.

Parents/carers/guardians will be informed of how the image will be used. ISFA will not allow an image to be used for something other than that for which it was initially agreed.

- All children or young people featured in ISFA publications will be appropriately dressed.
- Where possible, the image will focus on the activity taking place and not a specific child.
- Where appropriate, images represent the broad range of people participating safely in the event.
- Designated photographers will, where applicable, undertake a CRB/DBS check and attend a FA Safeguarding Children in Football workshop and in any case, will be personally responsible for keeping up to date with the latest guidelines on the Use of Images policies from the Football Association. ISFA identification will be worn at all times.



- Children who are the subject of a court order will not have their images published in any ISFA document.
- No images of children featured in ISFA publications will be accompanied by personal details such as their home address.
- Recordings of children for the purposes of legitimate coaching aids are only filmed by ISFA officials and are stored safely and securely by ISFA staff.
- Mobile phone cameras are not to be used in changing rooms.
- Any instances of inappropriate images in football should be reported to the Welfare Officer.
- ISFA will encourage children to tell us if they are worried about any photographs that are taken of them.
- ISFA forbids photography in private areas, such as changing rooms, toilets, showers or bedroom or whilst a child is in a state of undress.
- ISFA does not put young player profiles with images and personal information on its website.

## **Data Retention, Information Sharing and Storage**

### **Data Retention**

Children's data should be kept securely by the ISFA Staff Members responsible. No data may be shared with a third party unless explicit written permission has been obtained. Data must not be retained for longer than is necessary – this would normally mean for the duration of the programme/season or for so long as is necessary to re-invite the participant to a future event. Should a child withdraw from the programme, their data should be deleted.

### **Information Sharing**

The GDPR and Data Protection Act 2018 places duties on organisations and individuals to process personal information fairly and lawfully; they are not a barrier to sharing information, where the failure to do so would cause the safety or well-being of a child to be compromised. Should ISFA share information with other agencies for safeguarding reasons, the decision will be recorded.



### **Storage of Information**

Any safeguarding records that ISFA holds will be kept securely locked. These records are exempt from the disclosure provisions of the Data Protection Act 1998 where a child is, has been or may be at risk of child abuse. The best interests of the child will always be paramount. The principle of the sharing of details of individual cases will be limited to the minimum number of people who need to know.



## Event Checklist

### Before the camp

- Ensure that a risk assessment of the venue is undertaken.
- Ensure emergency contact details including those for the venue's nearest hospital have been circulated to all staff.
- Ensure all participants have signed a code of conduct.
- Ensure all medical/permission photo consent forms are handed in/ completed.
- Always take blu tac; marker pens and A4 plain paper. This will allow staff to pin up signs where necessary e.g. to separate staff toilets from participant toilets.
- At least one member of staff should carry out a reccy on the day before players arrive to ensure that the venue is safe.

### During the camp

- There should be a staff briefing before the players arrive. This is a time to share information about players including any injuries/ medical concerns and other important information.
- Players under 18 should register in with parents present unless ISFA has received parent permission saying players will arrive with someone else/ on their own.
- If a player has medication (including epi-pens and asthma inhalers) this should be checked at registration and collected if adult supervision is required.
- Once players are registered there should be a player briefing. All staff should be introduced; fire exits identified; out of bounds areas explained; door codes handed out. Players should also be reminded of the code of conduct that they have signed.
- There should be an identified place where emergency phone numbers are pinned up [e.g. in reception area of accommodation] if the venue solely occupied by ISFA.
- Staff must ensure that there are regular head counts throughout the day (including at meal times) and formal registration in the mornings; and evenings.



- Players should be aware of meeting times and evening curfews throughout the duration of the camp.
- A bedtime room curfew time should be set. A member of staff should check that the player/s are in their rooms at that time and complete a register sheet
- If there are any concerns about behaviour, a member of staff should randomly check the corridors after the room curfew.
- If ISFA is sharing a venue with other members of the public staff must be vigilant - especially in the evenings. Staff should also be vigilant if parents are entering accommodation to help players with bags at drop off/ pick up and players are in shared rooms. In such cases staff should use their professional judgement here.
- If a player has an accident or injury during the camp, their parents must be informed as soon as possible.

#### **At the end of the camp**

- All players must sign out with a parent/guardian visible unless they have parental permission to leave with some else/ on their own. If anyone fails to sign out this must be followed up.