



**FDE**

# OPERATIONAL SAFETY, INCLUSION & WELFARE POLICY FRAMEWORK

A practical governance framework for safe, inclusive and professionally managed activity delivery.

**Version 3.0 | September 2026**



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This framework brings together FDE's operational policies for safe and inclusive delivery. It is intended to sit alongside FDE's Safeguarding Children & Young People Policy, Personal Care/Toileting & Independence Support arrangements, Concussion Guidelines, Lightning & Thunderstorm Safety Policy, Privacy documentation and Activity/Session Terms & Conditions.

### CORE PRINCIPLE

**FDE will plan carefully, act early and place the safety, dignity, welfare and meaningful inclusion of children and participants ahead of participation, competition, convenience or commercial pressure.**

### Current framework

This framework has been drafted with regard to current English safeguarding, equality, health and safety, data-protection and football-sector expectations. It should be read as operational guidance, not as a substitute for professional medical, legal, regulatory or safeguarding advice where a situation requires specialist input.

### Contents

- 1. Health, Safety & Risk Management
- 2. First Aid, Medical Conditions & Medication
- 3. SEND, Inclusion & Reasonable Adjustments
- 4. Positive Behaviour, Regulation & Restrictive Intervention
- 5. Missing Child, Collection & Uncollected Child
- 6. Photography, Video, VEO & Digital Media
- 7. Complaints, Concerns & Whistleblowing
- 8. Staff Code of Conduct & Safer Working Practice
- 9. Safer Recruitment & Ongoing Suitability
- 10. Incident, Accident & Near-Miss Reporting
- 11. Extreme Weather & Environmental Conditions
- 12. Emergency & Critical Incident Plan
- 13. Equality, Diversity & Inclusion
- 14. Anti-Bullying
- 15. Data Protection, Confidentiality & Records Retention
- 16. Social Media & Electronic Communications
- 17. Transport, Travel & Off-Site Activity
- 18. Lone Working
- 19. Partnerships, Contractors & Subcontractor Standards





# 1. Health, Safety & Risk Management

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## Purpose and scope

To establish FDE's overarching arrangements for identifying and controlling risks arising from activities, venues, equipment, travel and changing conditions. It applies to all FDE-led sessions, events and programmes.

## FDE policy position

- FDE will take reasonably practicable steps to prevent injury and ill health and will not continue activity merely because it is scheduled or paid for.
- Risk assessment is a live process. Written assessments support, but do not replace, dynamic judgement by competent staff.
- Any FDE Session Lead may stop, modify, relocate, postpone or cancel activity where they reasonably believe conditions are unsafe.
- Children and participants with SEND or disabilities must be considered specifically when assessing communication, evacuation, supervision, sensory, mobility and welfare risks.

## Operational requirements

### Before activity

The Session Lead must consider the venue, playing surface, access and exits, equipment, weather, participant needs, first-aid provision, emergency access, supervision and any known hazards. Significant hazards must be controlled before activity starts.

### During activity

Staff must remain alert to changing conditions. New hazards must be removed, isolated or controlled. If adequate control cannot be achieved, the affected activity must stop.

### Equipment and facilities

Damaged or unsuitable equipment must not be used. Venue defects that create a material risk must be reported to the venue and, where necessary, the affected area taken out of use.

### Risk-benefit judgement

Sport involves ordinary physical risk. FDE does not seek to remove every challenge; it seeks to identify foreseeable material risks and manage them proportionately without unnecessarily restricting development, independence or enjoyment.

## Recording, escalation and review

- Significant hazards, accidents, near misses and safety-related cancellations should be recorded proportionately.
- Serious incidents must be escalated to management and, where applicable, the venue, commissioner, insurer, regulator or enforcing authority.

## Responsibility

All FDE staff, coaches, volunteers and contractors must understand and follow this policy where it applies to their role. The Session Lead is responsible for immediate operational decisions; safeguarding concerns must be escalated through FDE safeguarding procedures. Managers are responsible for ensuring learning from incidents, complaints, near misses and changes in guidance is reflected in practice.





## 2. First Aid, Medical Conditions & Medication

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### Purpose and scope

To provide a consistent approach to first aid, known medical needs, emergency medication and medical incidents during FDE activity.

### FDE policy position

- FDE will make proportionate first-aid arrangements based on the activity, participants, location and foreseeable risks.
- Parents/carers are expected to provide accurate and current medical information relevant to safe participation.
- Emergency treatment will not be delayed while attempting to contact a parent/carer.
- Medication support must remain within staff competence, agreed arrangements and applicable law/guidance.

### Operational requirements

#### Medical information

Relevant medical, allergy, medication and emergency information should be obtained before participation where reasonably practicable and made available to staff who need it for safety.

#### Medication

Where a participant requires medication during activity, arrangements should be agreed in advance. Emergency medicines such as inhalers or adrenaline auto-injectors should be readily accessible in accordance with the participant's plan and staff competence.

#### Emergency response

Call 999 where there is a life-threatening emergency or serious deterioration. Provide first aid within training and competence, arrange safe access for emergency services and ensure the participant is supervised.

#### Head injury

Any suspected concussion is managed under FDE's Concussion Guidelines. There is no same-day return following suspected concussion.

#### Parent/carer communication

Parents/carers should be informed promptly of significant illness, injury, medication use or emergency treatment unless doing so would create a safeguarding risk or conflict with emergency professional advice.

### Recording, escalation and review

- Record significant first aid and medical incidents factually.
- Review recurring incidents and whether an Individual Support Plan or additional controls are required.

### Responsibility

All FDE staff, coaches, volunteers and contractors must understand and follow this policy where it applies to their role. The Session Lead is responsible for immediate operational decisions; safeguarding concerns must be escalated through FDE safeguarding procedures. Managers are responsible for ensuring learning from incidents, complaints, near misses and changes in guidance is reflected in practice.



### 3. SEND, Inclusion & Reasonable Adjustments

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#### Purpose and scope

To set out FDE's specialist approach to inclusion for children and participants with SEND, disabilities, communication differences and additional support needs.

#### FDE policy position

- FDE aims to enable meaningful participation, not merely physical attendance.
- Needs will be considered individually; diagnosis alone will not determine what a participant can or cannot do.
- FDE will anticipate barriers and consider reasonable adjustments to communication, routines, staffing, equipment, environment, pace and delivery.
- Behaviour may communicate distress, pain, overload, fear, unmet need or difficulty understanding. Staff must consider this before treating behaviour as misconduct.
- FDE will not apply blanket exclusions simply because a child needs additional toileting, communication, regulation, mobility or welfare support.

#### Operational requirements

##### Planning with families

Where additional support is known, FDE should work with the participant and parent/carer to understand strengths, communication, triggers, regulation strategies, medical needs, personal-care arrangements and what helps the child participate.

##### Individual Support Plans

An Individual Support Plan should be used where needs are significant, recurring, safety-relevant or require clarity about roles. It should be practical, proportionate and available to staff who need it.

##### Communication

Staff should use the participant's most effective communication method, allowing processing time and using visual, simplified, repeated or alternative communication where helpful.

##### Sensory and regulation needs

Reasonable adjustments may include quieter spaces, predictable routines, movement breaks, reduced waiting, familiar staff, gradual transitions or changes to group demands.

##### Limits of provision

Where a need exceeds FDE's staffing, competence, equipment or safe operating scope, FDE will discuss reasonable alternatives rather than make assumptions or promise support that cannot safely be delivered.

#### Recording, escalation and review

- Significant adjustments and agreed support should be documented where necessary.
- Plans should be reviewed after incidents, material changes in need or feedback from the child/family.

#### Responsibility

All FDE staff, coaches, volunteers and contractors must understand and follow this policy where it applies to their role. The Session Lead is responsible for immediate operational decisions; safeguarding concerns must be escalated through FDE



safeguarding procedures. Managers are responsible for ensuring learning from incidents, complaints, near misses and changes in guidance is reflected in practice.

#### **FDE SEND COMMITMENT**

**We do not expect every child to fit a conventional sports session. Where reasonably possible, we adapt the session, communication and support around the child so they can participate safely, meaningfully and with dignity.**



## 4. Positive Behaviour, Regulation & Restrictive Intervention

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### Purpose and scope

To support safe, respectful participation while distinguishing deliberate misconduct from distress, dysregulation and disability-related behaviour.

### FDE policy position

- FDE uses positive, relational and proportionate approaches.
- Staff should seek to understand what behaviour is communicating and use de-escalation before sanction wherever safe to do so.
- Humiliation, intimidation, corporal punishment and punitive physical exercise are prohibited.
- Physical intervention is not a behaviour-management shortcut and may only be used where immediately necessary and proportionate to prevent harm or manage an emergency.

### Operational requirements

#### Prevention

Use clear expectations, predictable routines, appropriate challenge, communication supports, environmental adjustments and early recognition of escalating distress.

#### De-escalation

Reduce demands where appropriate, provide space, use calm language, minimise audiences, offer choices and use known regulation strategies.

#### Immediate safety

If there is an imminent risk of harm, staff may take proportionate action within competence to protect the child or others. The least restrictive effective response should be used for the shortest necessary time.

#### After an incident

Restore dignity, provide reassurance and regulation time, check for injury, inform relevant adults and consider whether the support plan or risk assessment needs changing.

### Recording, escalation and review

- Any significant physical intervention, injury, serious aggression, absconding or safeguarding concern must be recorded and reviewed.
- Parents/carers should normally be informed of significant incidents.

### Responsibility

All FDE staff, coaches, volunteers and contractors must understand and follow this policy where it applies to their role. The Session Lead is responsible for immediate operational decisions; safeguarding concerns must be escalated through FDE safeguarding procedures. Managers are responsible for ensuring learning from incidents, complaints, near misses and changes in guidance is reflected in practice.



## 5. Missing Child, Collection & Uncollected Child

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### Purpose and scope

To ensure a prompt, coordinated response where a child is missing, leaves unexpectedly, is not collected or collection arrangements create concern.

### FDE policy position

- A missing child is treated as a safeguarding matter until their safety is established.
- The remaining group must continue to be safely supervised while an appropriate search/escalation occurs.
- Known wandering/absconding risks should be planned for in advance where possible.
- A child must not be released to an adult where staff reasonably believe doing so would create an immediate safeguarding risk.

### Operational requirements

#### Missing or unexpectedly absent

Immediately establish when and where the child was last seen, check immediate safe areas, alert the Session Lead and maintain supervision. Contact the parent/carer and police promptly where risk, age, vulnerability or circumstances justify it; do not delay a necessary police report while conducting an extended search.

#### Uncollected child

Keep the child supervised and reassured, attempt authorised contacts and follow venue closure arrangements. Staff must not simply leave the child alone or transport them privately unless an agreed/emergency arrangement makes that appropriate.

#### Independent departure

Written parental/carer authorisation should be obtained where a child is permitted to leave independently. FDE may refuse an arrangement where it reasonably considers the circumstances unsafe.

#### Disputed or concerning collection

Follow safeguarding procedures, seek management/DSL advice and contact police where there is an immediate threat or dispute that cannot safely be resolved.

### Recording, escalation and review

- Record missing-child events, significant late collections and concerning collection incidents.
- Review patterns and consider changes to supervision or support plans.

### Responsibility

All FDE staff, coaches, volunteers and contractors must understand and follow this policy where it applies to their role. The Session Lead is responsible for immediate operational decisions; safeguarding concerns must be escalated through FDE safeguarding procedures. Managers are responsible for ensuring learning from incidents, complaints, near misses and changes in guidance is reflected in practice.



## 6. Photography, Video, VEO & Digital Media

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### Purpose and scope

To manage images and recordings safely while allowing legitimate coaching, analysis, safeguarding, operational and promotional use.

### FDE policy position

- Images and recordings must never compromise dignity, privacy or safeguarding.
- Promotional consent should be distinct from participation where required; a child should not be disadvantaged simply because promotional consent is withheld.
- No photography or recording is permitted in toilets, showers or changing areas where privacy may reasonably be expected.
- Coaching/analysis footage must be accessed and shared only for legitimate purposes and through appropriate systems.

### Operational requirements

#### Before recording

Clarify the purpose, lawful basis/consent arrangements, who will have access, expected retention and any venue/competition restrictions.

#### Match and analysis footage

VEO or similar systems may capture participants incidentally as part of sporting activity. Access should be controlled and footage should not be repurposed casually for promotion.

#### Promotional content

Use images that are appropriate, respectful and consistent with permissions. Avoid unnecessary personal information, location detail or captions that increase safeguarding risk.

#### Personal devices

Staff should use FDE-approved methods wherever practicable. Safeguarding concerns captured on footage must be handled as safeguarding information, not circulated informally.

### Recording, escalation and review

- Requests to withdraw promotional consent should be actioned prospectively where reasonably practicable.
- Safeguarding-relevant footage may need to be preserved notwithstanding routine deletion schedules.

### Responsibility

All FDE staff, coaches, volunteers and contractors must understand and follow this policy where it applies to their role. The Session Lead is responsible for immediate operational decisions; safeguarding concerns must be escalated through FDE safeguarding procedures. Managers are responsible for ensuring learning from incidents, complaints, near misses and changes in guidance is reflected in practice.



## 7. Complaints, Concerns & Whistleblowing

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### Purpose and scope

To provide accessible routes for raising service concerns, safeguarding concerns and concerns about wrongdoing without allowing one process to obstruct another.

### FDE policy position

- FDE welcomes concerns raised in good faith and will not disadvantage a child because a parent/carer has complained.
- Safeguarding concerns must be dealt with under safeguarding procedures even if presented as a complaint.
- Whistleblowers should be able to raise concerns about unsafe, unlawful or unethical practice without fear of retaliation.
- Complaints will be handled fairly, proportionately and as confidentially as circumstances permit.

### Operational requirements

#### Service complaints

Acknowledge, establish the issues, gather relevant information, respond proportionately and explain any further internal route.

#### Safeguarding complaints

Immediately refer to the DSL/safeguarding lead and, where required, external safeguarding agencies, police, LADO, The FA or other appropriate body.

#### Whistleblowing

Staff may raise concerns with management/DSL and may contact appropriate external bodies where internal reporting is inappropriate, unsafe, compromised or has failed to address a serious concern.

#### Vexatious or abusive contact

FDE may set reasonable communication boundaries where conduct becomes abusive, threatening or persistently repetitive, while ensuring genuine safeguarding or legal issues are not ignored.

### Recording, escalation and review

- Maintain a proportionate complaints log and safeguarding records separately where appropriate.
- Identify recurring themes and service improvements.

### Responsibility

All FDE staff, coaches, volunteers and contractors must understand and follow this policy where it applies to their role. The Session Lead is responsible for immediate operational decisions; safeguarding concerns must be escalated through FDE safeguarding procedures. Managers are responsible for ensuring learning from incidents, complaints, near misses and changes in guidance is reflected in practice.



## 8. Staff Code of Conduct & Safer Working Practice

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### Purpose and scope

To define the professional boundaries and conduct expected of anyone representing FDE.

### FDE policy position

- Adults must maintain professional, child-centred boundaries at all times.
- Staff must avoid favouritism, sexualised behaviour, discriminatory language, humiliating conduct and secretive relationships with children.
- One-to-one situations should be observable/accountable where practicable without compromising a child's dignity or necessary support.
- Physical contact must be appropriate to the activity, welfare need or safety situation and never be exploitative, punitive or secretive.

### Operational requirements

#### Communication

Use approved channels and age-appropriate professional language. Avoid unnecessary private messaging with children and do not build hidden or exclusive online relationships.

#### Changing and personal care

Follow FDE's safeguarding and personal-care arrangements. Adults must not routinely change or shower with children and must protect privacy.

#### Gifts and favouritism

Avoid gifts, rewards or special treatment that could create dependency, secrecy, perceived favouritism or inappropriate obligation.

#### Transport

Do not create unnecessary one-to-one transport arrangements. Follow the Transport policy and document exceptional arrangements.

#### Concerns about colleagues

Report boundary concerns, inappropriate conduct and safeguarding concerns promptly; do not investigate personally.

### Recording, escalation and review

- Breaches may result in removal from duties, disciplinary action, referral to safeguarding bodies or police, and/or termination of engagement.

### Responsibility

All FDE staff, coaches, volunteers and contractors must understand and follow this policy where it applies to their role. The Session Lead is responsible for immediate operational decisions; safeguarding concerns must be escalated through FDE safeguarding procedures. Managers are responsible for ensuring learning from incidents, complaints, near misses and changes in guidance is reflected in practice.



## 9. Safer Recruitment & Ongoing Suitability

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### Purpose and scope

To reduce the risk of unsuitable people gaining access to children and to ensure suitability is considered throughout engagement, not only at appointment.

### FDE policy position

- FDE will use role-appropriate safer recruitment checks and assess DBS eligibility according to the actual duties of the role.
- Recruitment decisions will consider identity, experience, qualifications, references, safeguarding understanding and relevant gaps or concerns.
- A DBS certificate is one element of safer recruitment, not a guarantee of suitability.
- Staff must disclose information that may materially affect their suitability where required by contract, policy or law.

### Operational requirements

#### Role design and advertisement

Define safeguarding responsibilities and required checks before recruitment.

#### Selection

Use structured applications/interviews where proportionate, explore safeguarding attitudes and clarify unexplained employment/volunteering gaps where relevant.

#### References and checks

Obtain and scrutinise references proportionately. Complete identity, qualification and right-to-work checks where applicable. Undertake the legally appropriate DBS level for eligible roles.

#### Induction and probation

Provide safeguarding, conduct, emergency and role-specific induction before or at commencement and supervise new staff appropriately.

#### Ongoing suitability

Respond to allegations, conduct concerns, criminal information, safeguarding referrals or changes in duties. Reassess DBS eligibility when a role materially changes.

### Recording, escalation and review

- Keep recruitment and vetting records securely and only for appropriate periods.
- Refer to relevant bodies where legal/regulatory thresholds are met.

### Responsibility

All FDE staff, coaches, volunteers and contractors must understand and follow this policy where it applies to their role. The Session Lead is responsible for immediate operational decisions; safeguarding concerns must be escalated through FDE safeguarding procedures. Managers are responsible for ensuring learning from incidents, complaints, near misses and changes in guidance is reflected in practice.



## 10. Incident, Accident & Near-Miss Reporting

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### Purpose and scope

To ensure significant events are recorded, escalated, learned from and reported externally where required.

### FDE policy position

- FDE encourages reporting of near misses as well as actual harm.
- Records should be factual, timely and proportionate.
- Reporting is for learning and accountability, not blame.
- Serious events must be considered for external reporting obligations, including safeguarding, insurance, commissioning and health-and-safety requirements.

### Operational requirements

#### Immediate priorities

Make the situation safe, provide first aid/emergency response, protect children and preserve relevant evidence.

#### Recording

Record what happened, when/where, who was involved, injury/damage, immediate actions, witnesses and follow-up. Avoid speculation.

#### Escalation

Notify management promptly of serious injury, hospital attendance, safeguarding concern, significant near miss, emergency-service involvement or event likely to attract regulatory/commissioner/insurer interest.

#### Learning

Review causes and controls. Update risk assessments, training, equipment or procedures where appropriate.

### Recording, escalation and review

- Management must consider whether RIDDOR or another statutory/external notification is required; not every sports injury is reportable.
- Retain records in line with legal, insurance and data-retention requirements.

### Responsibility

All FDE staff, coaches, volunteers and contractors must understand and follow this policy where it applies to their role. The Session Lead is responsible for immediate operational decisions; safeguarding concerns must be escalated through FDE safeguarding procedures. Managers are responsible for ensuring learning from incidents, complaints, near misses and changes in guidance is reflected in practice.



## 11. Extreme Weather & Environmental Conditions

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### Purpose and scope

To manage environmental risks beyond lightning, including heat, cold, ice, wind, flooding, poor air quality and reduced visibility.

### FDE policy position

- Weather decisions are based on actual risk, not whether a session has already been paid for or travelled to.
- Children, SEND participants and people with medical conditions may be affected differently and require additional adjustments.
- The Session Lead may shorten, adapt, move or cancel activity.

### Operational requirements

#### Heat and sun

Consider temperature, humidity, shade, hydration, intensity, breaks, clothing, sun protection and individual vulnerability. Reduce intensity/duration or cancel where safe delivery cannot be maintained.

#### Cold, ice and snow

Consider surface safety, wind chill, wet clothing, waiting time and ability to warm participants. Do not use unsafe frozen/slippery surfaces.

#### Wind and structural hazards

Consider goals, temporary structures, trees, debris and travel conditions. Secure or remove equipment where necessary.

#### Flooding and poor air quality

Avoid contaminated/flooded areas and adapt/cancel where air quality or environmental contamination presents a material risk.

#### Lightning

Follow the separate FDE Lightning & Thunderstorm Safety Policy.

### Recording, escalation and review

- Record significant weather-related cancellations/incidents where useful for audit or commissioner requirements.

### Responsibility

All FDE staff, coaches, volunteers and contractors must understand and follow this policy where it applies to their role. The Session Lead is responsible for immediate operational decisions; safeguarding concerns must be escalated through FDE safeguarding procedures. Managers are responsible for ensuring learning from incidents, complaints, near misses and changes in guidance is reflected in practice.



## 12. Emergency & Critical Incident Plan

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### Purpose and scope

To provide a clear command structure for serious incidents that exceed routine session management.

### FDE policy position

- Protect life first; communications and reputation management come later.
- One person should coordinate the incident while others carry out defined tasks.
- Emergency services instructions take precedence.
- Children must remain supervised and accounted for throughout an emergency.

### Operational requirements

#### Activation

The Session Lead or manager may activate the critical incident response for serious injury, missing child, fire, major safeguarding event, violent incident, structural/environmental emergency, fatality or other event requiring coordinated management.

#### Core actions

Call emergency services, stop activity, account for participants/staff, move to a safe location, provide first aid, preserve access routes, contact management and parents/carers as appropriate.

#### Information control

Nominate one management contact for commissioners, venues, media and external enquiries. Staff should not post incident information on social media.

#### Post-incident

Support affected children/staff, complete records, notify relevant bodies, preserve evidence, review decisions and consider welfare/debrief support.

### Recording, escalation and review

- Maintain accessible emergency contacts and venue-specific arrangements.
- Conduct proportionate post-incident review and update plans.

### Responsibility

All FDE staff, coaches, volunteers and contractors must understand and follow this policy where it applies to their role. The Session Lead is responsible for immediate operational decisions; safeguarding concerns must be escalated through FDE safeguarding procedures. Managers are responsible for ensuring learning from incidents, complaints, near misses and changes in guidance is reflected in practice.



## 13. Equality, Diversity & Inclusion

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### Purpose and scope

To ensure FDE services are inclusive, respectful and free from unlawful discrimination, harassment and victimisation.

### FDE policy position

- FDE values difference and will challenge discriminatory behaviour.
- Reasonable adjustments for disabled participants are an active, anticipatory consideration.
- Decisions about participation must be based on legitimate safety, suitability or service considerations, not stereotypes.
- Inclusion does not require FDE to undertake tasks outside lawful, insured or competent provision, but alternatives and adjustments should be considered.

### Operational requirements

#### Access and participation

Identify barriers in communication, booking, facilities, equipment and delivery and make reasonable adjustments where required.

#### Language and conduct

Discriminatory abuse, harassment and victimisation are unacceptable and may lead to removal from activity.

#### Decision-making

Document significant decisions to restrict participation where disability or another protected characteristic is relevant, including adjustments considered.

#### Accessible communication

Provide information in alternative or simplified formats where reasonable and practicable.

### Recording, escalation and review

- Equality concerns may be raised through complaints or safeguarding routes depending on the issue.

### Responsibility

All FDE staff, coaches, volunteers and contractors must understand and follow this policy where it applies to their role. The Session Lead is responsible for immediate operational decisions; safeguarding concerns must be escalated through FDE safeguarding procedures. Managers are responsible for ensuring learning from incidents, complaints, near misses and changes in guidance is reflected in practice.



## 14. Anti-Bullying

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### Purpose and scope

To prevent and respond to bullying, including disability-related, discriminatory, sexual, online and peer-on-peer bullying.

### FDE policy position

- Bullying is not an inevitable part of sport and will be addressed.
- Children reporting bullying should be listened to and taken seriously.
- Responses should protect the targeted child while addressing the behaviour and needs of the child causing harm.
- Serious or persistent bullying may also constitute a safeguarding concern.

### Operational requirements

#### Prevention

Set clear behavioural expectations, promote respect and inclusion, supervise known risk areas and challenge discriminatory language.

#### Response

Listen separately, record significant facts, assess immediate safety, avoid forced reconciliation, involve parents/carers appropriately and agree proportionate actions.

#### Online bullying

Where online behaviour affects FDE participants or safety, FDE may address it even if it occurred outside the session.

#### Escalation

Refer to safeguarding agencies/police where threats, sexual harm, hate incidents, exploitation or other serious concerns meet relevant thresholds.

### Recording, escalation and review

- Monitor recurrence and the effectiveness of actions.

### Responsibility

All FDE staff, coaches, volunteers and contractors must understand and follow this policy where it applies to their role. The Session Lead is responsible for immediate operational decisions; safeguarding concerns must be escalated through FDE safeguarding procedures. Managers are responsible for ensuring learning from incidents, complaints, near misses and changes in guidance is reflected in practice.



## 15. Data Protection, Confidentiality & Records Retention

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### Purpose and scope

To ensure personal and safeguarding information is handled lawfully, securely and proportionately.

### FDE policy position

- Only collect information that FDE has a legitimate reason to use.
- Access should be limited to those who need information for their role.
- Confidentiality is not absolute where information needs to be shared to safeguard a child or meet another legal obligation.
- Safeguarding records should be accurate, factual, securely stored and distinct where appropriate from routine service records.

### Operational requirements

#### Collection and transparency

Provide appropriate privacy information and identify lawful bases for processing.

#### Security

Use secure systems, appropriate access controls and care when sending sensitive information.

#### Information sharing

Share relevant, necessary and proportionate information with safeguarding partners/agencies where required or justified; record significant decisions.

#### Retention and deletion

Use documented retention periods informed by legal, safeguarding, insurance and operational needs. Do not keep information indefinitely merely because storage is available.

#### Data incidents

Report suspected loss, unauthorised access or disclosure internally immediately so regulatory notification requirements can be assessed.

### Recording, escalation and review

- Maintain privacy notices and retention arrangements under review as services change.

### Responsibility

All FDE staff, coaches, volunteers and contractors must understand and follow this policy where it applies to their role. The Session Lead is responsible for immediate operational decisions; safeguarding concerns must be escalated through FDE safeguarding procedures. Managers are responsible for ensuring learning from incidents, complaints, near misses and changes in guidance is reflected in practice.



## 16. Social Media & Electronic Communications

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### Purpose and scope

To set safe professional boundaries for digital communication involving children, families and FDE staff.

### FDE policy position

- Official FDE channels should be used for programme communication wherever practicable.
- Adults must not use digital communication to create secret, sexualised, exploitative or inappropriate relationships with children.
- Group communication and parent/carer visibility should be used where age and context make this appropriate.
- Staff must protect confidential and safeguarding information online.

### Operational requirements

#### Messaging children

Keep communication necessary, professional, transparent and related to legitimate FDE activity. Avoid disappearing-message features for safeguarding-relevant communications where possible.

#### Personal accounts

Staff should not seek unnecessary personal social-media relationships with children they work with through FDE.

#### Images and content

Follow FDE photography/digital media requirements and never publish humiliating, confidential or unsafe content.

#### Concerns

Preserve relevant messages/screenshots where a safeguarding concern arises and report through safeguarding procedures rather than conducting an online investigation.

### Recording, escalation and review

- Breaches may be managed under conduct, safeguarding or disciplinary processes.

### Responsibility

All FDE staff, coaches, volunteers and contractors must understand and follow this policy where it applies to their role. The Session Lead is responsible for immediate operational decisions; safeguarding concerns must be escalated through FDE safeguarding procedures. Managers are responsible for ensuring learning from incidents, complaints, near misses and changes in guidance is reflected in practice.



## 17. Transport, Travel & Off-Site Activity

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### Purpose and scope

To manage travel and off-site activity safely and with clear responsibility.

### FDE policy position

- Parents/carers ordinarily remain responsible for arranging transport unless FDE has expressly agreed otherwise.
- Avoid unnecessary one-to-one transport of a child by a staff member.
- Vehicles/drivers used on behalf of FDE must be lawful, suitable and appropriately insured.
- Off-site activities require proportionate planning for supervision, medical needs, communication, toilets, collection and emergencies.

### Operational requirements

#### Planning

Confirm destination, timings, staffing, emergency contacts, transport responsibilities and relevant participant needs.

#### Private vehicles

Where exceptional staff transport is necessary, obtain appropriate authorisation/consent, use safe arrangements and avoid secrecy.

#### Minibuses/coaches

Use competent drivers and lawful seating/restraint arrangements. Maintain participant lists and headcounts.

#### Overnight activity

Requires enhanced planning for sleeping arrangements, privacy, staffing, medication, personal care, safeguarding and emergency procedures.

### Recording, escalation and review

- Record significant transport incidents or deviations from agreed arrangements.

### Responsibility

All FDE staff, coaches, volunteers and contractors must understand and follow this policy where it applies to their role. The Session Lead is responsible for immediate operational decisions; safeguarding concerns must be escalated through FDE safeguarding procedures. Managers are responsible for ensuring learning from incidents, complaints, near misses and changes in guidance is reflected in practice.



## 18. Lone Working

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### Purpose and scope

To manage risks where staff work alone or with limited immediate support.

### FDE policy position

- Lone working must be avoided where the safeguarding or safety risk cannot be adequately controlled.
- Working alone with a child is not automatically prohibited, but must be justified, transparent and managed to reduce risk.
- Staff should have a reliable means of summoning assistance.

### Operational requirements

#### Assessment

Consider location, time, participant needs, personal-care possibility, aggression risk, medical needs, communications and emergency access.

#### One-to-one activity

Use observable/open environments where practicable, ensure another responsible person knows the arrangement and maintain professional boundaries.

#### Check-in arrangements

Use proportionate check-in/out procedures for isolated venues, late working or higher-risk situations.

#### Stopping work

A staff member may stop lone work if circumstances change and they no longer consider it safe.

### Recording, escalation and review

- Report lone-working incidents and review controls.

### Responsibility

All FDE staff, coaches, volunteers and contractors must understand and follow this policy where it applies to their role. The Session Lead is responsible for immediate operational decisions; safeguarding concerns must be escalated through FDE safeguarding procedures. Managers are responsible for ensuring learning from incidents, complaints, near misses and changes in guidance is reflected in practice.



## 19. Partnerships, Contractors & Subcontractor Standards

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### Purpose and scope

To ensure FDE's safeguarding, safety and inclusion expectations are maintained when services involve venues, commissioners, partners, contractors or subcontractors.

### FDE policy position

- Contracting out delivery does not remove the need for FDE to consider safeguarding and safety assurance.
- Expectations should be proportionate to the role and level of contact with children.
- FDE will not knowingly use a provider whose practices create an unacceptable safeguarding or safety risk.
- Responsibilities should be clear where FDE operates within another organisation's venue or programme.

### Operational requirements

#### Due diligence

Consider safeguarding arrangements, insurance, competence, qualifications, DBS eligibility/checks where relevant, health and safety and complaint/escalation routes.

#### Written expectations

Where proportionate, agreements should identify responsibility for safeguarding referrals, first aid, risk assessment, supervision, data sharing, incidents and emergency arrangements.

#### Monitoring

Concerns about a partner or contractor should be escalated and may result in suspension of activity while risks are assessed.

#### Information sharing

Share only information necessary for safe delivery and safeguarding, using appropriate lawful arrangements.

### Recording, escalation and review

- Keep proportionate evidence of checks and agreements.
- Review partners after serious incidents, complaints or material changes.

### Responsibility

All FDE staff, coaches, volunteers and contractors must understand and follow this policy where it applies to their role. The Session Lead is responsible for immediate operational decisions; safeguarding concerns must be escalated through FDE safeguarding procedures. Managers are responsible for ensuring learning from incidents, complaints, near misses and changes in guidance is reflected in practice.



## Appendix A — Operational decision hierarchy

### STOP ACTIVITY

**Any FDE Session Lead may stop an activity immediately where there is a reasonable safety or safeguarding concern. Permission from a parent, venue, commissioner or participant is not required to make an immediate protective decision.**

- 1. Protect life and immediate safety.
- 2. Safeguard children and account for participants.
- 3. Call emergency services or statutory agencies where required.
- 4. Notify FDE management/DSL.
- 5. Inform parents/carers and partners where appropriate.
- 6. Record facts and preserve relevant evidence.
- 7. Review, learn and update controls.

### Key external escalation routes

- Emergency services: 999
- Police non-emergency: 101
- NHS: 111 where appropriate for urgent medical advice
- Local authority Children's Social Care / LADO: use the current contact for the relevant local authority
- The FA safeguarding route where applicable to affiliated football
- Relevant commissioner, venue, insurer, regulator or enforcing authority where notification is required



## Appendix B — Individual Support Plan: minimum information

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- Participant and parent/carer contact details
- Strengths, interests and what successful participation looks like
- Communication method and processing needs
- Known medical/allergy/emergency information
- Mobility, sensory, toileting/personal-care or continence needs
- Known triggers, signs of distress/dysregulation and helpful regulation strategies
- Reasonable adjustments and equipment
- Staff support required and tasks outside FDE staff scope
- Emergency/evacuation considerations
- Collection/departure arrangements
- Consent/assent and child's preferences where appropriate
- Review date and changes following incidents



## Appendix C — Reference framework

FDE will keep this framework under review against changes in law, statutory guidance, football requirements, commissioning expectations and learning from practice. At the date of issue, the principal reference framework includes:

- Working Together to Safeguard Children 2026 (Department for Education).
- Children Act 1989 and Children Act 2004, including current safeguarding information-sharing requirements.
- Equality Act 2010 and current guidance/code material on reasonable adjustments for disabled service users.
- Health and Safety at Work etc. Act 1974 and applicable HSE guidance, including risk assessment, first aid and RIDDOR.
- UK GDPR and Data Protection Act 2018.
- The FA safeguarding, safer recruitment, DBS and welfare guidance applicable to football.
- FDE's separate Safeguarding Children & Young People Policy, Personal Care/Toileting & Independence Support Policy, Concussion Guidelines and Lightning & Thunderstorm Safety Policy.

### Review and approval

This framework will be formally reviewed no later than 30<sup>th</sup> December 2027 and sooner where there is a significant incident, change in law or statutory guidance, change in FA requirements, organisational/service change, commissioner requirement or learning indicating revision is needed.

|                              |                                   |
|------------------------------|-----------------------------------|
| <b>Approved by</b>           | Football Development East Limited |
| <b>Version</b>               | 3.0 – September 2026              |
| <b>Effective from</b>        | 30 <sup>th</sup> September 2026   |
| <b>Next scheduled review</b> | 30 <sup>th</sup> December 2027    |