



# **SAFEGUARDING CHILDREN AND YOUNG PEOPLE**

## **POLICY & PROCEDURES**

**Effective: 30<sup>th</sup> September 2026 | Review by: 30<sup>th</sup> December 2027**

### **Football Development East Limited**

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## Document control

|                                  |                                                                                                                                                                                                   |
|----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Policy owner</b>              | Football Development East Limited                                                                                                                                                                 |
| <b>Safeguarding lead contact</b> | Designated Safeguarding Lead / Welfare Officer:<br>Jon Haines - info@fdeonline.co.uk   0330 043 9456. Safeguarding training must have been completed/refreshed within the previous two years.     |
| <b>Applies to</b>                | All FDE activities, programmes, services, staff, coaches, contractors and volunteers involving children or young people                                                                           |
| <b>Effective date</b>            | 30 September 2026                                                                                                                                                                                 |
| <b>Review cycle</b>              | Formal review no later than 30 December 2027, and sooner following significant legal, regulatory, organisational or safeguarding change, a serious incident, or material change in FDE provision. |
| <b>Status</b>                    | Company policy - mandatory for all persons acting on behalf of FDE                                                                                                                                |

## 1. Purpose and scope

Football Development East Limited (FDE) is committed to providing football and related activities in which children and young people are safe, heard, respected and able to participate free from abuse, neglect, exploitation, bullying, discrimination and avoidable harm.

This policy applies to every FDE activity involving a person under 18, whether delivered directly by FDE or by staff, coaches, contractors, volunteers or partners acting on FDE's behalf. It applies in person and online, at training, matches, events, camps, talent identification activity, travel, changing facilities and any other setting connected with FDE activity.

**Core principle** The welfare and best interests of the child are paramount. Safeguarding is everyone's responsibility. A person does not need proof that abuse has occurred before raising a concern.

## 2. Policy framework

FDE's approach is informed by current safeguarding law, statutory guidance and football-specific safeguarding requirements. In particular, this policy should be read and applied consistently with:

- Working Together to Safeguard Children 2026 (Department for Education), including its emphasis on shared responsibility, listening to children, inclusive and anti-discriminatory practice, and effective multi-agency working.
- The Children Acts 1989 and 2004 and other relevant child protection legislation.
- The FA Safeguarding Children Policy, Safeguarding Children Regulations and current FA safeguarding guidance for grassroots football.

- The FA safer recruitment and DBS requirements applicable to roles involving children.
- The statutory Information Sharing to Safeguard Children and Young People guidance, including the information-sharing duty coming into force on 30 September 2026 where applicable.
- UK data protection law, including the UK GDPR and Data Protection Act 2018, alongside safeguarding-specific lawful bases for necessary information sharing.
- Local multi-agency safeguarding arrangements and referral procedures in the area where the child lives or the activity takes place.

Where FDE activity is affiliated to, sanctioned by or delivered with another football body, FDE will also comply with the safeguarding rules and reporting requirements that apply to that activity. Nothing in this policy prevents an immediate referral to the Police, Children's Social Care or another statutory agency where this is necessary to protect a child.

### 3. Our safeguarding commitments

- Treat every child as an individual and with dignity and respect.
- Listen to children and take their wishes, feelings and lived experience seriously, while acting in their best interests.
- Create an inclusive culture and challenge racism, discrimination, harassment, bullying and other harmful behaviour.
- Recognise that children may experience more than one form of harm at the same time, including harm occurring online or outside the home.
- Make reasonable adjustments and provide additional support where disability, communication need, neurodivergence or other circumstances may make it harder for a child to communicate or be heard.
- Use safer recruitment, appropriate supervision, codes of conduct, risk assessment and safeguarding training to reduce foreseeable risk.
- Respond promptly, proportionately and professionally to concerns, allegations and disclosures.
- Share safeguarding information lawfully when necessary and keep clear, secure records of decisions and actions.

### 4. Roles and responsibilities

#### 4.1 Directors and senior management

**Jon Haines, Director, has overall organisational responsibility for safeguarding within Football Development East Limited. This senior responsibility is separate from the operational Designated Safeguarding Lead / Welfare Officer role.**

- Provide leadership and resources for safeguarding.
- Ensure this policy is implemented, reviewed and understood.
- Ensure appropriate safer recruitment, training, supervision and reporting arrangements are maintained.
- Support the Designated Safeguarding Lead/Welfare Officer and ensure concerns about senior personnel can be escalated independently.

#### 4.2 Designated Safeguarding Lead / Welfare Officer

- Act as the principal point of contact for safeguarding concerns within FDE.
- Receive, record and triage concerns and ensure appropriate referrals or consultations are made without avoidable delay.

- Liaise, where relevant, with The FA, the appropriate County FA Designated Safeguarding Officer, Children's Social Care, Police, Local Authority Designated Officer (LADO) or equivalent, and other agencies.
- Promote safeguarding awareness, safer working practice and a culture in which children are listened to.
- Maintain confidential safeguarding records and monitor patterns, repeated concerns and actions.

### 4.3 Secondary safeguarding contact

**If the Designated Safeguarding Lead / Welfare Officer is unavailable, safeguarding concerns should be reported to the nominated secondary safeguarding contact: FDE Director / Senior Management - [info@fdeonline.co.uk](mailto:info@fdeonline.co.uk) | 0330 043 9456. The secondary contact will take any immediate protective action required and contact the Designated Safeguarding Lead for advice as soon as practicable. This route must not delay direct contact with Police, Children's Social Care, LADO or another appropriate authority where urgent action is required.**

### 4.4 Everyone working for or with FDE

Every adult working or volunteering in FDE activity must follow this policy and the relevant code of conduct, maintain professional boundaries, complete required training and checks, report concerns promptly, and cooperate with safeguarding processes. It is not the role of staff or volunteers to investigate suspected abuse.

## 5. Safer recruitment and suitability

FDE will use a proportionate safer recruitment process for roles involving children. This may include a clear role description, identity checks, application and employment history, interview or suitability discussion, references, qualification checks, safeguarding declarations and appropriate DBS checks.

For football roles requiring an FA-accepted DBS, FDE will follow current FA requirements. The FA states that persons aged 16 or over undertaking potentially unsupervised roles working directly with under-18s must have the appropriate Enhanced DBS with Children's Barred List check, and that newly appointed individuals must hold an FA-accepted DBS before working unsupervised with children.

- No person will be permitted to work in a role for which they are barred or otherwise legally ineligible.
- A DBS certificate is one part of safer recruitment and does not replace references, supervision, conduct standards or ongoing vigilance.
- Suitability is ongoing. New information, conduct concerns or changes in role may require review, risk assessment, suspension from duties or referral.

## 6. Expected standards of behaviour

Adults must model safe, respectful and professional behaviour. They must avoid conduct that could harm a child, create an inappropriate dependency or relationship, or reasonably be perceived as grooming, favouritism, intimidation, humiliation or abuse.

- Use age-appropriate language and coaching methods; do not use degrading, threatening, sexualised or discriminatory language.
- Avoid unnecessary one-to-one situations out of sight or hearing of others. Where one-to-one contact is necessary, make it observable, accountable and consistent with the activity risk assessment.
- Physical contact must be appropriate to the activity, necessary, proportionate and never secretive or sexualised.

- Do not form sexual or otherwise inappropriate relationships with children. Position-of-trust and relevant criminal-law requirements must be respected at all times.
- Do not exchange private or disappearing-message communications with children outside approved arrangements.
- Do not give children alcohol, nicotine products, illegal drugs or inappropriate medication, or encourage their use.
- Do not transport a child alone unless this has been specifically authorised, risk assessed and is necessary; agreed transport arrangements should be transparent to parents/carers and FDE.
- Never ignore bullying, hazing, discriminatory abuse, harmful sexual behaviour or unsafe practice.

## 7. Recognising safeguarding concerns

Safeguarding concerns may arise from a disclosure, observation, injury, change in behaviour, information from another person, online content, repeated low-level concerns, or circumstances suggesting a child may be at risk. Concerns may relate to abuse or neglect within or outside the family, peer-on-peer harm, exploitation, online harm, domestic abuse, discrimination, radicalisation, trafficking, criminal exploitation, sexual exploitation, harmful sexual behaviour, bullying, self-harm risk or other threats to welfare.

Staff should remain professionally curious. Children may communicate distress indirectly, through behaviour or through non-verbal communication. Disability, communication differences or additional needs must never be treated as a reason to discount a concern.

## 8. Responding to a disclosure

1. Listen calmly and take the child seriously.
2. Do not promise secrecy. Explain that information may need to be shared with people who can help keep them safe.
3. Allow the child to speak in their own words. Ask only minimal, open questions needed to clarify what they are telling you; do not investigate or repeatedly question them.
4. Reassure the child that they were right to speak up. Do not criticise the alleged person responsible or make promises about outcomes.
5. Make an accurate written record as soon as possible, distinguishing the child's words and factual observations from your own interpretation.
6. Report the concern promptly to the FDE Designated Safeguarding Lead/Welfare Officer, unless doing so would create risk or the concern relates to that person; in those circumstances escalate directly to an external safeguarding authority or senior director as appropriate.

**Emergency** If a child is in immediate danger or requires urgent medical attention, call 999. Do not delay emergency action while attempting to contact FDE or a football safeguarding officer.

## 9. Reporting and referral procedure

Concerns must be acted upon according to their seriousness and urgency. The following route applies:

| Situation                         | Action                                                                                                          |
|-----------------------------------|-----------------------------------------------------------------------------------------------------------------|
| Immediate danger / serious injury | Call 999 and take immediate protective action. Inform the FDE safeguarding lead as soon as it is safe to do so. |

|                                                                      |                                                                                                                                                                                                                                                                                                 |
|----------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Concern that a child may be suffering or at risk of significant harm | Contact the FDE safeguarding lead immediately. A referral or consultation with Children's Social Care and/or Police must not be delayed where required.                                                                                                                                         |
| Concern about an adult working with children                         | Report immediately to the FDE safeguarding lead. FDE will consider referral to the relevant Local Authority Designated Officer (LADO), Police, The FA/County FA and DBS where applicable. Do not conduct an internal investigation that could compromise a statutory or football investigation. |
| Poor practice / lower-level concern                                  | Record and report it. The safeguarding lead will assess patterns, context and whether advice, management action, training, risk assessment or external referral is required.                                                                                                                    |

Anyone may report directly to statutory agencies or The FA where appropriate. Current FA guidance identifies reporting routes through the organisation/club welfare officer, County FA Designated Safeguarding Officer, The FA Safeguarding Team, NSPCC, Police or Children's Social Care. No person will be penalised for raising a genuine safeguarding concern in good faith.

## 10. Allegations and concerns about staff, coaches or volunteers

Any allegation or concern that a person working with children has harmed a child, may have harmed a child, may pose a risk of harm, may have committed a relevant offence, or has behaved in a way that indicates they may be unsuitable to work with children must be reported without delay.

- FDE will prioritise the safety of children while ensuring fair process for the adult concerned.
- FDE may remove a person from child-facing duties or impose interim safeguards while advice is sought. This is a neutral protective measure and is not a finding of wrongdoing.
- FDE will consult the LADO or equivalent local authority service where the threshold or circumstances require it, and will notify football safeguarding bodies where applicable.
- Where statutory or football authorities are involved, FDE will coordinate its actions so that internal enquiries do not prejudice external investigations.
- Where legal criteria are met, FDE will make any required referral to the Disclosure and Barring Service or other authority.

## 11. Child-on-child abuse, bullying and harmful behaviour

Abuse can be caused by other children. FDE will not dismiss harmful behaviour as banter, horseplay or an inevitable part of sport. Reports of bullying, discriminatory abuse, sexual harassment, sexual violence, hazing, coercion, image-based abuse, online abuse or other harmful behaviour will be assessed and responded to according to the needs and safety of all children involved.

Responses will be child-centred, proportionate and informed by risk. Support and safety planning may be required for the child who has been harmed, the child alleged to have caused harm, witnesses and the wider group.

## 12. Online safety, communications and social media

- Use FDE-approved communication channels and maintain professional boundaries.
- Where practical, communications concerning children should include or be visible to parents/carers, another authorised adult, or an approved group channel.

- Do not use disappearing messages, secret accounts or private social-media relationships with children for FDE business.
- Do not share personal information, images, video or safeguarding information unless authorised and necessary.
- Any online sexualised contact, grooming concern, threatening behaviour, coercion, indecent imagery concern or other serious online risk must be reported immediately.

### 13. Photography, video and performance analysis

FDE may use photography or video for coaching, analysis, promotion or programme administration where there is an appropriate lawful basis and any required consent or notice. Images and recordings must be stored, accessed, shared and retained responsibly. A parent/carer or child raising a safeguarding concern about imagery must be taken seriously.

- Do not photograph or record children in toilets, showers or changing areas.
- Avoid identifying a child by full name alongside unnecessary personal information.
- Do not use personal devices or accounts in ways that bypass FDE safeguards or create private collections of children's images.
- Safeguarding concerns visible in footage must be reported even if the recording was created for another purpose.

### 14. Changing rooms, toilets, personal care and independence support

FDE will plan supervision and facilities in a way that respects children's privacy, dignity, age, disability, communication needs and safeguarding needs. Adults should not routinely change or shower with children and must avoid unnecessary presence in changing areas. Arrangements should be proportionate to the child, the activity and the facilities available, with privacy protected without creating avoidable safeguarding risk.

#### 14.1 FDE position and principles

FDE is an inclusive, SEND-aware sports and activity provider. A significant part of FDE's work is designed to enable children with special educational needs, disabilities, communication differences or additional support needs to participate meaningfully in sport. FDE does not routinely offer intimate personal care as a standalone or conventional care service. It does, however, deliberately provide proportionate toileting, hygiene, communication and independence support where this is reasonably necessary to enable a child to participate safely, with dignity and as independently as possible.

FDE's approach is intentionally more responsive than a "no personal care" model. Staff must never ignore, abandon or leave a child distressed simply because a welfare need arises in a toilet, changing area or other private setting. The guiding principles are the child's welfare and best interests, dignity, privacy, inclusion, proportionality, consent or assent where possible, transparency, accountability and the least intrusive effective support. Staff must encourage independence, explain what they are doing, work within their competence and avoid unnecessary physical contact or exposure.

#### 14.2 Definitions and boundary of support

For the purposes of this policy:

- Toileting and independence support means guidance, supervision, prompting, reassurance or limited practical assistance that enables a child to manage toileting, hygiene, clothing, communication or movement as independently as reasonably possible.

- Intimate personal care means assistance involving direct contact with, cleaning of or exposure of genital, anal or other ordinarily private areas, or changing continence products or soiled underwear. FDE does not routinely provide this as a service.
- Unexpected welfare assistance means the minimum immediate help reasonably necessary where an unforeseen situation leaves a child distressed, unsafe, unable to manage or at risk of loss of dignity. This is a safeguarding and welfare response, not routine intimate-care provision.

The distinction is important: the fact that FDE does not routinely provide intimate care does not prevent a properly vetted and competent member of staff from responding proportionately to an unexpected welfare situation when failing to assist would leave a child unsafe, distressed or without reasonable support.

#### **SEND-SPECIFIC COMMITMENT**

**FDE will not apply a blanket “no personal care” rule where that would leave a child distressed or create an avoidable barrier to participation. We will plan support wherever practicable and respond to unforeseen welfare needs compassionately, proportionately and within staff competence and safeguarding boundaries.**

### **14.3 Support FDE will normally provide**

- Accompanying or guiding a child to the toilet and safely back to the activity where this is needed.
- Waiting immediately outside or nearby, according to the child’s assessed needs and the layout of the facility.
- Giving verbal, visual or communication-aid prompts about toileting, clothing, flushing, handwashing and returning to the activity.
- Checking verbally, or by the child’s usual communication method, that the child is safe and has completed what they need to do.
- Supporting handwashing and other non-intimate hygiene routines.
- Providing reasonable non-intimate practical assistance with doors, taps, soap dispensers, mobility, communication, orientation or a clothing fastening where this can be done without intimate contact or exposure.
- Allowing additional time, a calm approach and familiar routines to support independence and reduce distress.

### **14.4 Support FDE does not routinely provide**

Unless a specific arrangement has been assessed and formally agreed in advance, FDE staff should not routinely undertake intimate personal-care tasks such as:

- wiping or cleaning a child’s genital or anal area;
- changing nappies, continence pads or soiled underwear;
- intimate washing or bathing;
- routine undressing or dressing involving intimate exposure;
- manual lifting, hoisting or specialist transfers requiring specific training or equipment; or
- medical or clinical procedures outside the staff member’s training and FDE’s agreed scope.

A child will not be excluded automatically simply because one of these needs may arise. FDE will discuss the individual need with the child and parent/carer and consider whether a safe support plan, trained person, parent/carer arrangement, suitable equipment or another reasonable adjustment can enable participation. Where FDE cannot safely meet a need, the reason will be explained and practical alternatives considered rather than applying a blanket exclusion.

## 14.5 Planned needs and Individual Support Plans

Where FDE knows before attendance that a child may need toileting, hygiene, communication or personal-care support, the Session Lead or other nominated person should discuss this privately with the parent/carer and, where appropriate, the child. FDE will approach this as an inclusion and safeguarding matter, not as a reason for automatic exclusion. An Individual Support Plan should be used where the support is more than routine or where clarity is needed. It should record, as relevant:

- what the child can do independently and how independence will be encouraged;
- communication needs and how the child indicates that they need help;
- the prompts, supervision or practical assistance normally required;
- any known intimate-care requirement and who normally provides it;
- mobility, transfer, continence, sensory, behavioural or medical considerations;
- what FDE staff are agreed, trained and competent to do and any task they must not undertake;
- when a parent/carer should be contacted or attend;
- any equipment, spare clothing or hygiene supplies required and who provides them;
- privacy and dignity measures, the child's preferences and any relevant safeguarding considerations; and
- what should happen if the child's needs differ from the agreed plan.

Parent/carer consent supports good planning but does not remove FDE's safeguarding duties and does not authorise any person to act outside their competence, training, legal responsibilities or this policy. The child's views and assent should be sought in a manner appropriate to their age and communication needs.

## 14.6 Unexpected personal-care situation - "I am not OK"

If a child says, signs, communicates or otherwise indicates that they are "not OK" while using the toilet, changing or managing a personal-care need, staff must respond. This may include a child who is stuck, has had an accident, is injured, is highly distressed, cannot manage clothing or hygiene, or cannot safely complete the task independently. The child must not be left in distress, without dignity or at foreseeable risk merely because the situation may involve intimate care. The following safeguards apply:

- Speak calmly and ask the child, using their usual communication method, what is wrong and what help they need. Do not ask intrusive questions that are unnecessary to resolve the immediate welfare issue.
- Encourage the child to do as much as they can for themselves. Offer verbal prompting or practical non-intimate support before physical assistance.
- If the child is safe and a parent/carer is readily available, contact them to provide intimate assistance where this is the safest and least intrusive option. However, staff must consider the child's immediate welfare: waiting for a parent/carer is not appropriate where delay would leave the child distressed, undignified, medically compromised or at foreseeable risk.
- If entry to a toilet or changing area is necessary, tell the child what you intend to do before entering, seek their assent where possible and preserve their privacy.
- Where practicable, another staff member should know that assistance is being given and remain nearby or otherwise be aware of the circumstances. This is an accountability safeguard and does not mean unnecessarily exposing the child to a second adult.
- Where waiting is not appropriate, an appropriately vetted and competent member of staff may provide only the minimum immediate assistance reasonably necessary to restore safety, dignity or welfare. The intervention must be proportionate to the need, should preserve as much independence and privacy as possible, and must stop if the child objects unless immediate action is reasonably necessary to prevent serious harm.
- Use appropriate hygiene precautions. Staff must not undertake a manual lift, hoist, clinical procedure or other task for which they are not trained or competent.

- If there is an immediate medical emergency, safeguarding concern or risk of serious harm, obtain appropriate emergency assistance and follow FDE's safeguarding procedure without delay.
- Notify the parent/carer promptly after any significant or intimate assistance, unless doing so would create a safeguarding risk or a statutory agency advises otherwise.
- Make a factual written record where the intervention was significant, intimate, unusual, involved distress or injury, departed from an agreed plan, or raised a safeguarding concern.

#### **14.7 Privacy, dignity and safe working**

- Use respectful, age-appropriate language and never joke about, shame or show disgust or embarrassment about a child's toileting, continence or personal-care needs.
- Do not photograph, film or make audio recordings of a child during personal care or in a toilet, shower or changing area.
- Protect the child's privacy by closing doors or using suitable screening where appropriate, balanced against the child's assessed support needs and safe-working arrangements.
- Avoid unnecessary physical contact, intimate exposure and the presence of additional adults who are not required for the child's welfare or staff accountability.
- Where possible, explain each step before physical assistance and give the child time to respond. Physical assistance should never be punitive, rushed or secretive.
- Report any injury, unusual mark, disclosure, concerning behaviour or safeguarding concern immediately under this policy. Staff must not investigate an allegation themselves.

#### **14.8 Staffing, competence and accountability**

Any member of staff who may provide planned toileting or independence support must have appropriate safeguarding training, be briefed on this policy and have the level of DBS check required or permitted for their role under current law and applicable FA requirements. FDE will identify any additional training required by an individual child's needs before agreeing planned support. No member of staff is expected or authorised to perform a task for which they are not competent.

Where a child's planned needs go materially beyond the support described in this section, the Designated Safeguarding Lead/Manager must complete an individual assessment before attendance. FDE will consider staffing, competence, facilities, equipment, insurance, commissioning requirements and any regulatory implications before agreeing the arrangement.

#### **14.9 Recording, confidentiality and review**

Routine accompaniment to a toilet and ordinary verbal prompting do not require an incident report unless the child's support plan says otherwise. A record must be made where there is intimate physical assistance, an accident requiring significant help, injury, distress, a safeguarding issue, an unusual event or a departure from the child's agreed plan.

Records must be factual, proportionate and confidential and should include the date and time, child, staff involved, what the child said or communicated, assistance provided, why it was necessary, parent/carer notification and any follow-up. Information must be handled in accordance with FDE's safeguarding, information-sharing and data-protection arrangements.

FDE's core provision is activity-based sports coaching and participation. Before deliberately expanding into routine intimate personal care, FDE will review the proposal with its insurer and obtain appropriate safeguarding, regulatory and commissioning advice. Any requirement imposed by a commissioning authority, venue or partner must also be considered.

## 15. Children with SEND, disabilities or communication needs

FDE recognises that children with SEND, disabilities or communication needs may face additional barriers to participation, to communicating discomfort or abuse, and to accessing help. Some may rely more heavily on adults for communication, mobility, toileting, regulation or personal support. FDE therefore treats inclusive safeguarding as an active responsibility: staff should understand the individual child, make reasonable and safe adjustments, listen to communication in all its forms, and avoid policies or practices that leave a child distressed simply because their support needs differ from those of other children.

- Make reasonable adjustments to communication and participation.
- Do not assume that an injury, distress or behaviour is explained by a disability or diagnosis.
- Give children time and suitable methods to communicate.
- Work constructively with parents/carers and relevant professionals while keeping the child's voice central.

## 16. Missing child and collection arrangements

FDE will maintain appropriate attendance and collection arrangements for activities. If a child is missing, staff will promptly check the immediate area, confirm attendance/collection information, alert the activity lead and safeguarding lead, contact the parent/carer and, where risk or circumstances require, contact Police. One adult should not abandon supervision of the wider group in order to search alone.

## 17. Trips, transport and off-site activity

Off-site activities and transport must be appropriately planned and risk assessed. FDE will consider supervision ratios, emergency contacts, medical information, travel arrangements, accommodation, changing facilities, communication, missing-child procedures and any additional safeguarding needs. Overnight arrangements require specific safeguards and clear parental/carer information.

## 18. Medical information and emergencies

Relevant medical information should be collected and used only to support safe participation and emergency response. Medication should be managed according to agreed arrangements. In an emergency, the child's immediate health and safety take priority; emergency services should be contacted and the parent/carer informed as soon as practicable.

## 19. Information sharing, confidentiality and records

Safeguarding information is confidential but not secret. FDE will share relevant information when this is necessary and lawful to protect a child, support safeguarding action or comply with legal and regulatory duties. Consent is not always required for safeguarding information sharing, and fear about data protection must not prevent necessary protective action.

From 30 September 2026, the statutory information-sharing duty under section 16LA of the Children Act 2004 comes into force for organisations and practitioners within its scope. FDE will follow the applicable statutory guidance and will cooperate appropriately with safeguarding partners and relevant agencies.

- Record what was seen, heard, disclosed, decided and done, including dates, times and who was informed.
- Use the child's own words where relevant and clearly separate fact from opinion.
- Store safeguarding records securely with access restricted to those who need it.

- Share only what is relevant and proportionate, but do not withhold information where sharing is necessary to safeguard a child.
- Record the rationale for significant decisions to share or not share information.
- Retain records in accordance with legal, insurance, regulatory and safeguarding requirements.

## 20. Whistleblowing and escalation

FDE expects staff, volunteers, parents/carers and participants to speak up where safeguarding practice is unsafe or a concern has not been handled appropriately. Concerns may be escalated to senior FDE management, The FA/appropriate County FA, the relevant local authority safeguarding service, Police, NSPCC or another competent authority as appropriate. No one should suffer retaliation for raising a genuine concern in good faith.

## 21. Training, induction and supervision

- Safeguarding expectations form part of induction for relevant personnel.
- Required FA safeguarding qualifications, role-specific training and DBS status will be monitored where applicable.
- All staff and volunteers working with children must complete safeguarding training on a yearly basis. Additional safeguarding learning will be refreshed and updated when guidance, role or risk changes.
- Managers and safeguarding leads will use supervision, debriefing and review to identify emerging risks, patterns and learning.

## 22. Partnership working and third-party providers

Where FDE works with venues, clubs, schools, local authorities, charities, commercial partners or other providers, safeguarding responsibilities must be clear. FDE will not assume that another organisation has dealt with a concern merely because it has been informed. Relevant information and referrals will be followed through and recorded.

## 23. Complaints and safeguarding

A complaint may also contain safeguarding information. Safeguarding concerns will be separated from ordinary service complaints and managed under this policy where appropriate. A complaint process must never delay a safeguarding referral or emergency action.

## 24. Policy breaches

Failure to follow this policy may result in removal from activity, management action, disciplinary action, termination of engagement, referral to football authorities, statutory agencies or professional/regulatory bodies, and any other action necessary to protect children.

## 25. Key contacts and reporting routes

|                               |                                                                             |
|-------------------------------|-----------------------------------------------------------------------------|
| <b>FDE safeguarding</b>       | info@fdeonline.co.uk   0330 043 9456                                        |
| <b>Emergency</b>              | 999 - where a child is in immediate danger or urgent assistance is required |
| <b>Police - non-emergency</b> | 101                                                                         |

|                                            |                                                                                                                          |
|--------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|
| <b>NSPCC Helpline</b>                      | 0808 800 5000   <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>                                                 |
| <b>The FA Safeguarding Team</b>            | <a href="mailto:safeguarding@thefa.com">safeguarding@thefa.com</a>   0800 169 1863 (ask for the safeguarding team)       |
| <b>Local Children's Social Care / LADO</b> | Use the current contact details for the local authority responsible for the child or the area in which the concern arose |

## 26. Reference framework

The following sources informed this policy. Staff should use the current versions available from the issuing bodies:

- Department for Education - Working Together to Safeguard Children 2026.
- Department for Education - Information Sharing to Safeguard Children and Young People (statutory guidance, updated September 2026).
- The Football Association - Safeguarding Children Policy, Safeguarding Children Regulations, grassroots safeguarding guidance, safer recruitment and DBS guidance, and reporting guidance.
- NSPCC - guidance and helpline resources for reporting concerns about children.

## 27. Review and approval

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

|                              |                                   |
|------------------------------|-----------------------------------|
| <b>Approved by</b>           | Football Development East Limited |
| <b>Effective from</b>        | 30 <sup>th</sup> September 2026   |
| <b>Next scheduled review</b> | 30 <sup>th</sup> December 2027    |
| <b>Version</b>               | 12.3 - September 2026             |