



Safeguarding Policy

Reviewed December 2024



This policy applies to all adults who work at or for Liverpool FC: people who are contracted, casual, agency, contractors, volunteers, interns, host families and people undertaking work experience.



Please read this in conjunction with the following;

- ✓ Introduction to Safeguarding – E-Learning c/o Premier League
- ✓ If you work with children or adults at risk, the Guide to Safeguarding for your part of the Club.
- ✓ Safer Working Practices – LFC advice and Premier League Guidance

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Introduction

At Liverpool we're part of a team.

We have a culture like no other – The Liverpool Way.

We should walk it, talk it, live it every day.



Safeguarding children is the action that is taken to promote the welfare of children and protect them from harm. 'The welfare of the child is paramount' (Children's Act 1989)

Adult Safeguarding means protecting an adults right to live in safety, free from abuse and neglect.

We all have a statutory responsibility to ensure that we promote the welfare of children (KCSIE 2024) and adults at risk and follow Safeguarding expectations, regardless of whether we work directly with these groups or not-We are very clear that subjecting children and young people to harassment, violence and / or abuse, may breach children's rights, as set out in the Human Rights Act.

We've created these guidelines to help provide support to you so that we can ensure that all children and adults enjoy a first class experience of Liverpool FC. It is important that you do not assume it is not your problem. We live by the mantra that 'it could happen here'

Everyone who works at LFC should have an awareness of safeguarding issues that can put children or adults at risk at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes' images and/or videos can be signs that children are at risk.

Welfare and Safeguarding is often about putting small pieces of a jigsaw together – so don't hesitate to report anything that worries you, however small. Working together (2023) underpins the work undertaken to safeguard children and adults at LFC.



Liverpool FC Safeguarding Aims

We fulfill our legal obligations to protect the welfare and safeguarding of children and adults who we work with or who we come into contact with.

Everyone who works at LFC must carry out their roles with exemplary professionalism, within a positive culture for safeguarding.

The brand reputation of Liverpool FC is enhanced by providing first-class safeguarding provision. We are guided by a Legal framework which includes two main pieces of legislation:-

- The Children Act 1989 (2004) where the safety and welfare of children and adults at risk is the 'first priority' for all people with responsibility for them.
- 2014 Care Act defines Adults at Risk, and the role of all organisations who work with them.
- Plus Statutory Guidance "Keeping Children Safe in Education", and 'Working Together to Safeguard Children' which is updated annually. This underpins the Premier League's regulations.

We are also guided by the Premier League and Football Association who are very specific about safeguarding requirements through:

- [Premier League Safeguarding Standards](#)
- [Safeguarding section of the Premier League Rules](#)

LFC Policy Statement with regard to PREVENT

Liverpool FC will not tolerate extremist activity or any behaviour which creates an environment for the radicalisation of individuals, regardless of which extremist ideology it is based upon. Liverpool FC aims to protect vulnerable individuals from being radicalised or exposed to extremism, by identifying who they are and providing them with support. PREVENT is part of all our Safeguarding responsibilities.





Definitions of terms used in this policy

→ Children are defined as anyone under the age of 18

→ Adults at risk are defined as over 18 years old and;

- have care and support needs (whether the local authority are meeting these or not); They may be at risk of or experiencing abuse or neglect. As a result of their care and support needs, they are unable to protect themselves from harm or threat of harm. If they have capacity – they must give consent before referring to another agency.

Safeguarding at Liverpool FC also ensures that the below groups are safeguarded appropriately;

- Young Players – any youngster who is at the Boys or Girls Academy's.
- Adults who are vulnerable through their own or others behaviour or a change in personal circumstances.

→ **Disclosure**
is when a child tells you something about themselves or their lives.

→ **Allegation**
is when someone reports something about another person who works for LFC, a volunteer or contractor. **See LFC Allegations Policy and Low Level Concerns Policy (for allegations that do not meet the harm threshold) , which is available on The Source or from LFC Safeguarding Team members.**

→ **Radicalisation**

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. It is defined as “the process through which an individual changes from passiveness or activism to become more revolutionary, militant or extremist, especially where there is intent towards, or support for violence.”

→ **Extremism**

Extremism is defined as “the holding of extreme political or religious views” and the ‘vocal or active opposition to fundamental British Values.



Safeguarding Behaviours we expect from LFC colleagues

We ask that LFC Colleagues	Please don't
 Know Liverpool FC policies and procedures for safeguarding.	 Ignore any potential welfare or safeguarding matter, however trivial you may deem it to be. Report it in on My Concern immediately
 Know how to contact the Liverpool FC Safeguarding team.	 Leave vulnerable people to be responsible for their own safety.
 Always act in the best interest, and safety of all children and adults.	 Act in the best interests of those working for LFC, if it jeopardises the welfare or safety of a child or adult.
 Apply the same professional standards to all regardless of age, disability, gender re-assignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.	 Do not make physical contact with a child unless it is necessary. Always gain their consent first.
 Recognise the developmental needs of children and capacity of vulnerable groups.	 Use your role at Liverpool FC to form or promote a personal relationship with a vulnerable person. Do not treat vulnerable people like your own children, it is a professional relationship.
 Challenge poor practice and report it. Ensure all incidents, allegations, low level concerns, and safeguarding concerns are recorded and reported on My Concern.	 Use your position to intimidate, threaten, coerce, exploit or undermine children or adults.
 Be aware that your conduct outside of work may impact on your suitability to work with vulnerable groups.	 Engage in sexual, betting or gambling related activities or have discussions whilst in work or wearing LFC clothing or I.D. badge. Access, make or distribute illegal or indecent content or images of children or adults.
 Expect and encourage high standards of behaviour from other team members. Maintain professional boundaries at all times.	 When working with children or adults, do not make fun of, or use banter. Banter from adults to children is inappropriate.

For further details please refer to the Premier League's publication: **Guidance on Safer Working Practices.**

For further details on reporting concerns please refer to **LFC Recording Policy.**



The 5 R's - An easy way to remember Safeguarding Guidelines

	What we want you to do?	What LFC Safeguarding team will do?
Recognise	Spot there is a concern and ask that person, sensitively, for further detail	
Respond	Take the concerns seriously, get as much detail as possible. Never commit to keeping information confidential.	
Report	To the Liverpool FC Safeguarding team as soon as possible using My Concern and inform your Designated Safeguarding officer if you need advice.	Receive your report, and triage the case; <ul style="list-style-type: none"> • Monitor • Ask for Further detail • Carry out a further investigation • Refer to an external agency. If we can, under confidentiality, we will keep your Designated Safeguarding Lead updated on every case.
Record	Keep a record, securely of what you found out. Recording on My Concern is sufficient.	If not done so already, put onto My Concern. All subsequent actions will also be recorded on My Concern.
Review	If relevant and possible, monitor the individual, or situation and report in any developments.	Keep all cases under review.

Please read and refer to;
[LFC Recording Policy](#)
AND
[LFC Low Level Concerns Policy.](#)





How Safeguarding Concerns can Arise?

- ➔ A child or adult tells you something directly, or you overhear a conversation.
- ➔ A child or adult at risk goes missing.
- ➔ A person working for LFC or partner organisation passes on information.
- ➔ You observe concerning behaviour or see actions or visible marks on an adult or child.
- ➔ A report is made about behaviour that gives cause for concern, indicates poor practice or a breach of the Code of Conduct.
- ➔ Low-level concerns about someone in a position of trust. Please refer to the Low Level Concerns Policy
- ➔ Apart from direct reporting, concerns can be expressed:
 - Via past or present team members
 - Via social media
 - Anonymously via text, letters emails or telephone calls



Position of Trust;
Anybody working with or alongside Under 18's and / or adults at risk.





Safeguarding children and adults from being radicalised

PREVENT is part of the government's counter terrorism strategy, aimed at stopping people becoming terrorists or supporting terrorism. The strategy covers all forms of terrorism, including far right extremism and some aspects of non-violent extremism. All those who work for Liverpool FC have been trained to spot radicalisation and extremism and how to report any concerns that they might have if someone is showing extremist views or might have been radicalised" online or offline.

Indicators

There are a few behaviours which may indicate a person is at risk of being radicalised. People working at LFC are asked to be alert to:

- Disclosures by children and adults of their exposure to extremist actions, views or materials of others outside the Club, such as in their homes, schools or community groups or online, especially where children or adults haven't actively sought them out.
- Graffiti symbols, writing or artwork promoting extremist messages or images.
- Children or adults accessing extremist material online, including social media sites.
- Parental reports of changes in behaviour, friendships or actions and requests for assistance.
- Reports of issues affecting children or adults in the local area.
- Children or adults voicing opinions drawn from extremist ideologies and narratives.
- Use of extremist or 'hate' terms to exclude others or incite violence.



Liverpool FC PREVENT Ethos and Practice

→ Extremist Ideologies

There is no place for extremist views of any kind at Liverpool FC, whether from internal or external sources. Liverpool FC recognises that extremism and exposure to extremist materials and influences can lead to poor outcomes for children or adults and that if we fail to challenge extremist views, we are failing to protect everyone who works for LFC and our fans.

Any prejudice, discrimination or extremist views, including derogatory language, displayed by anyone who works for LFC or fans will always be challenged and where appropriate, dealt with in line with our internal Disciplinary Policy or Club guidelines.

→ Board Level Commitment

If there are any concerns relating to radicalisation and extremism, these should be raised with the Director of Safeguarding or the Designated Safeguarding Leader for your area of the Club as per the Recording policy. The Director of Safeguarding will inform the Senior Safeguarding Lead (SSL) and provide monthly overviews of key safeguarding information.

Training

→ All people who are employed full time, casual and volunteers who work with children or adults at risk at Liverpool FC will receive PREVENT training appropriate to their role within the Club.

All staff will receive annual briefings to inform them of current risks and to inform of any new information provided by the Local PREVENT Officer.

Online Safety and Web Filtering

→ LFC use software to track access or attempted access to any inappropriate material accessed through club devices or networks. This will highlight any attempts to access extremist material.



LFC Safeguarding Expectations

➔ What to do if you become aware of a Safeguarding matter?

It is NOT the responsibility of people working for Liverpool FC to decide if something is a safeguarding matter, but IT IS your responsibility to act on any concerns.

➔ What to do?

Report it to the Liverpool FC Safeguarding Team as soon as possible. This team will handle all referrals that might need to be made to external bodies. Please refer to the Recording Policy when reporting a concern.

➔ How to Report a concern?

If you work in:

Academy, Foundation, an International Academy, Soccer Schools, or LFC Women you will have been trained in how to use My Concern software – please use this to report in any concerns as per the Recording policy.

If you work at the stadium in a leadership position for safety or you lead young team members, you will complete training on how to report issues on My Concern.

If you work in other parts of the club, you can report in via;

Nicola Fryer	Director of Safeguarding	07780226978	Nicola.fryer@liverpoolfc.com
Lorna Duckworth	Deputy, Director of Safeguarding	07841629809	Lorna.Duckworth@liverpoolfc.com

Or via:

Designated Safeguarding Officer for your area of the club as per the relevant Department Safeguarding poster.

Website: www.liverpoolfc.com/fans/safeguarding



→ Confidentiality

The need to maintain confidentiality

The individual's best interests are always paramount. Liverpool FC will support any team member who shares information in circumstances where the individual believes that by not sharing the information a child or adult would be put at risk of harm.

It is recognised that whilst certain information can be kept confidential, there may be occasions where information may need to be shared with the relevant authority, with or without the consent of the individual.

Confidential information about an individual should never be used casually in conversation, or shared with any person other than on a need-to-know basis.

In circumstances where the individual's identity does not need to be disclosed, the information should be handled anonymously.

When listening to a disclosure, you cannot guarantee to keep the matter confidential. There are some circumstances in which a team member may be expected to share information about an individual. For example, when abuse is alleged or suspected. In such cases everyone who works for LFC has a duty to pass information on without delay, but only to the Liverpool FC Safeguarding team.

→ What to do if you need Safeguarding support?

There may be an occasion where you feel or believe a team member is subject to abuse or has safeguarding needs. If that is the case, then you can contact the LFC Safeguarding team. They will listen and help point you in the right direction for help and support. If necessary, the safeguarding team will refer to HR, where the Employee Assistance Programme may be appropriate.



Safeguarding Definitions

→ Balance of Power

It is important to recognise that relationships between children and adults are not equal. In professional sport the power imbalance is tilted even more in favour of Coaches and other adults. Be aware of this, do not exploit the power of the LFC badge.

→ Reporting Concerns

All people who work for LFC have a legal responsibility to report any concerns they might have for the welfare of a child or adult. At Liverpool FC please use My Concern and follow the reporting policy to report in as soon as possible. Please refer to the **Low Level Concerns Policy and Allegations policy** if there is a concern regarding staff..

→ Position of Trust

If, as part of your work for Liverpool FC, you work with anyone under the age of 18, it means you are in a “regulated activity”. This means you must go through the appropriate safer recruitment processes, specific induction and other training facilitated by Liverpool FC Safeguarding team. This includes change of contract within LFC, i.e. from volunteer to casual or casual to contracted. In addition, you are in a “position of trust”, and must ensure your relationship with anyone you know, through your work at LFC who is under 18, remains purely professional.



Safeguarding Definitions

The following are an update on developments in Statutory Guidance on Safeguarding, as it applies to Liverpool FC.

→ Online Safety

It is essential that children are protected from potentially harmful and inappropriate online materials.

This can be divided into 4 different sorts

Content – being exposed to illegal, inappropriate, or harmful contents.

Contact – being subjected to harmful online interaction with other users

Conduct – online behaviour that increases the likelihood of or causes harm

Commerce – risks such as online gambling, inappropriate advertising, phishing, or financial scams.

If you think any child or adult is unsafe online, please report it to the LFC Safeguarding team – either through My Concern or through contacting one of the Safeguarding team. Please refer to LFC Social Media policy and Acceptable Use Policy.

Sending or forwarding sexualised images is illegal.

→ Domestic Abuse

The definition captures a range of different abusive behaviours, including physical, emotional, economic abuse and coercive and controlling behaviour..

Children can be victims of Domestic abuse even if they witness incidents. Experiencing domestic abuse can have a serious, long lasting emotional and psychological impact on children. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

If you are aware of domestic abuse report it in. The HR and Safeguarding teams can and will help.



Safeguarding Definitions

The following are an update on recent developments in Statutory Guidance on Safeguarding, as it applies to Liverpool FC.

→ Sexual Violence and Sexual Harassment

Liverpool FC has a zero-tolerance approach to sexual violence and sexual harassment. It is never acceptable and will not be tolerated. This is regarding your own conduct but also that of the supporters – children and adults – that we work with. It is especially important not to pass off any sexual violence or sexual harassment as “banter”, “just having a laugh”, “part of growing up” or “boys being boys” as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

→ Hate Crime

Racist language can be deemed to be a hate crime.

→ Low Level Concerns - Please refer to Low Level Concerns Policy

It is now a **legal requirement** to report in low level concerns to LFC Safeguarding.

A Low Level Concern is any concern about an adult’s behaviour towards a child, young person or adult at risk that does not meet the allegation threshold or not considered serious enough to consider a referral to the Local Designated Officer (LADO) or other external agencies. It includes where an adult has not acted in a manner consistent with LFC’s Safeguarding Policy and Procedure, and / or relates to their conduct in or outside of work.



LFC Safeguarding Leaders

Designated Safeguarding Leads

Name		Phone	Email
Nicola Fryer	Director of Safeguarding	07780226978	Nicola.fryer@liverpoolfc.com
Lorna Duckworth	Deputy Director of Safeguarding	07841629809	Lorna.Duckworth@liverpoolfc.com

Designated Safeguarding Officers

Academy	Kieran Baillie	07554298128	Kieran.Baillie@liverpoolfc.com
Foundation	Lorna Duckworth	07841629809	Lorna.Duckworth@liverpoolfc.com
Soccer Schools	Andrew Nicholas	07526622975	Andrew.Nicholas@liverpoolfc.com
Stadium Operations	Lorna Duckworth	07841629809	Lorna.Duckworth@liverpoolfc.com
Liverpool FC Women	Victoria Buckley-Smyth	07340498792	Victoria.BuckleySmyth@liverpoolfc.com
All other parts of the club	Nicola Fryer	07780226978	Nicola.fryer@liverpoolfc.com



Policy at a glance

We want everyone to have a first class experience of Liverpool FC.

The guidelines and procedures contained in this policy are designed to help us satisfy our legal responsibilities to protect the welfare and safeguarding of children and adults.

Safeguarding is everybody's responsibility. Recognise, Respond, Report.

Please memorise this acronym and apply it to your everyday work.

Stay alert: Look out for things that worry or concern you. Listen and watch and do not leave it to others to take action. Act.

Responsibly: Never engage in, or encourage behaviour that could be misinterpreted.

Find out first: If you see something that concerns you, you must contact the Liverpool FC Safeguarding team.

Exemplify good practice: Be an everyday living example of our Safeguarding Policy in action.

All who work full time or as a casual team member at LFC Academy are required as referenced in the Premier League Safeguarding Standards, to read and understand Part 1 of Keeping Children Safe in Education. This can be found via the below link;

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1181955/Keeping_children_safe_in_education_2023.pdf

LFC require everyone who works for LFC to familiarise themselves annually with Safeguarding Issues that you need to be aware of in Appendix A.

If you have any questions in relation to this policy or require further guidance, please contact:

hrservices@liverpoolfc.com or Director of Safeguarding nicola.fryer@liverpoolfc.com



APPENDIX A

Abuse and Neglect

- **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm.
- **Physical Abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- **Emotional Abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
- **Sexual Abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse.
- **Neglect:** : the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. It may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs





APPENDIX A

Safeguarding Issues

Below are some Safeguarding issues all team members should be aware of. Additional information can be requested from the Director of Safeguarding.

→ **Child on Child Abuse:** children can abuse other children. It is most likely to include, but may not be limited to:

- **bullying** (including cyberbullying, prejudice-based and discriminatory bullying)
- **abuse in intimate personal relationships** between children (sometimes known as ‘teenage relationship abuse’)
- **physical abuse** such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- **sexual violence**, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence.
- **sexual harassment**, such as sexual comments, remarks, jokes and online sexual harassment,
- **causing someone to engage in sexual activity without consent**, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- **consensual and non-consensual sharing of nude and semi-nude images and/or videos** (also known as sexting or youth produced sexual imagery)
- **upskirting**, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm,
- and **initiation/hazing type violence and rituals** (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).



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Below are some Safeguarding issues all team members should be aware of. Additional information can be requested from the Director of Safeguarding.

→ **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE):**

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual (CSE) or criminal activity (CCE), in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.



Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse

→ **Mental Health**

All people working at LFC should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. If team members have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following LFC Safeguarding policy, and speaking to the Designated Safeguarding Lead or Designated Safeguarding Officer.

→ **Serious Violence**

All people working at LFC should be aware of the indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include increased absence from school or college, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.





Version Control

Version	Revisions	Approval Date	Approved by
V3	<p>Terminology change throughout the document – vulnerable adults changed to ‘adults at risk’ –as per legislation and Premier League Guidance. The term colleagues has been replaced with people and / or team members.</p> <p>Page 2 – addition of Host Families Page 3 “Keeping Children Safe in Education” and ‘Children Act (2004) definitions replaced previous information. ‘Working Together (2018)’ legislation referred to, and Children’s rights included as per PL guidance. Page 4– Addition of Working Together to Safeguard Children Page 5– addition of volunteer and contractors, reference to Low Level Concerns Policy, harm threshold and British values. Amendments to radicalisation definition taken from KCSIE 2023. Page 6 – Addition of Low Level Concerns and Recording policy 2023 Page 7 – Addition of Low Level Concerns and Recording policy 2023, inform a Designated Safeguarding Officer , and situation included to reference contextual safeguarding. Page 8 – Addition of Low Level Concerns Policy and Position of Trust definition. Page 9 – Addition of online and offline added to alert that radicalisation can happen in both situations. Page 10 – Addition of Board Level Commitment, Recording Policy, Annual briefings by the local PREVENT officer and online safety and web filtering. Page 11 – Addition of Recording Policy and Designated Safeguarding Officer for your area of the club – provides additional contacts. Page 13 - Addition of Recording Policy and Low Level Concerns Policy Page 14 – Addition of LFC Social Media Policy and Acceptable Use Policy. Page 15 – Addition Low level Concerns Policy and the definition of a Low Level Concern Page 16 – Amendment to roles. Page 17 – Addition of link to KCSIE (2023) as per Premier League Guidance. Appendix A (Pages 18-20) Addition to ensure staff are aware of all Safeguarding issues as per KCSIE (2023)</p> <p>Reviewed and changes made to updated KCSIE (2024) and Working Together to Safeguard Children (2023) - no significant changes whilst Safeguarding Children and Adults policy is under review.</p>	21.12.2023	Jon Bamber – SVP General Counsel and Director of Football Administration & Governance

Revised December 2024