



L.F.C.

Foundation

Safeguarding children's policy

Foreword

“The LFC Foundation are committed to providing a world class safe environment for children and adults at risk. Safeguarding the welfare of every young person and adult is our priority. Through our vision, culture, and day to day operation, we want every young person and adult who access our programmes to enjoy their contact with Liverpool FC Foundation, feel safe, have a voice, and develop into good citizens. We want every participant to have an excellent experience”.

Matt Parish CEO, LFC Foundation



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Policy

Policy statement

This policy reflects LFC Foundations safeguarding vision, values and strategy.

At LFC Foundation we want our children and young people to be happy and safe. We believe that the welfare of children is paramount and that all children have the right to take part in Club activities in an environment that is safe and free from any risk of abuse.

We are committed to making sure that every child and young person who engages with the Club whether through football, education, community programmes or matchday experiences feels safe, supported and welcome.

Our objective is to build and maintain a culture that is positive, warm and inclusive, where safeguarding is part of everyday life and everyone plays a role in keeping others safe.

LFC Foundation believe that it is always unacceptable for a child to experience abuse of any kind and recognises its responsibility in taking every reasonable step to make it as difficult as possible for any form of abuse to happen, whether in person or online.

Safeguarding is part of our culture and values.

At LFC Foundation we're part of a team.

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

One where Safeguarding is at the heart of everything that we do.



Introduction

We seek to safeguard children by ensuring;

- ✓ That children are valued, listened to and respected
- ✓ Safeguarding guidance and best practice is adopted through implementation of safeguarding policies and procedures
- ✓ Safer recruitment of colleagues and all those who work with children by ensuring relevant vetting checks are made
- ✓ Sharing information about safeguarding and best practice
- ✓ That we work with appropriate statutory and football agencies to share information in a confidential manner.
- ✓ Provide effective training, support and supervision via the Safeguarding Workforce development plan.

All colleagues and volunteers have a responsibility to ensure the safety and welfare of children and adults at risk, including taking appropriate steps (including those set out in this policy) to ensure that suspicions and allegations of abuse and poor practice are taken seriously and reported immediately and appropriately.

NB: If in doubt, or if you have any questions about this policy or what you should do in a specific situation, you should immediately contact a member of the Safeguarding Team for guidance. Do not delay - it is far better to report a concern which later turns out to be unfounded than to assume that someone else will raise the issue.

Definition:
A child is any person under 18 years

Purpose & aims

The purpose of this policy is to;

Provide protection for children who receive services from LFC Foundation or its partners.

- to inform all stakeholders of LFC Foundation (the 'Club', 'our', 'we') of safeguarding requirements and processes.
- To provide guidance on procedures that should be adopted if a child may be experiencing, or be at risk or harm

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

Appendix 1 – explains the different types of abuse and safeguarding concerns.

This policy aims to enable and empower all employees and relevant stakeholders with the necessary information to carry out their moral, legal and regulatory responsibilities, which contribute to the protection and wellbeing off all children that engage with the LFC Foundation. Application of this policy ensures;

- timely and appropriate action to safeguard and promote the welfare of children
- that everyone working with the LFC Foundation understands their safeguarding responsibilities.
- training and support is provided so staff and volunteers feel confident in recognising and responding to safeguarding issues.
- a safe, inclusive and child-centred environment where people feel heard, respected and protected.
- Safeguarding is embedded into the values, culture and everyday practices of LFC Foundation.

What is safeguarding?

Safeguarding is the proactive commitment to protect children and young people from abuse, neglect, exploitation, and harm. It involves identifying risks early, providing appropriate support, and creating safe environments where they can thrive. Safeguarding means placing the safety and wellbeing of anyone under 18 at the heart of all activities.

Children and young people have the right to feel safe wherever they are; at home, in the community, at school, or at football. At LFC Foundation, we aim to ensure children are safe, happy, listened to, and supported to reach their potential and make a positive contribution to society.

Safeguarding is everyone's responsibility. All staff, volunteers, and partners must prioritise the welfare and wellbeing of children and young people in everything we do.

Appendix 1 – explains the different types of abuse and safeguarding concerns.

Safeguarding and promoting the welfare of children is defined as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing impairment of children's mental and physical health or development
- ensuring children grow up in circumstances consistent with the provision of safe and effective care
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.



How safeguarding concerns can arise

- A child tells you something directly, or you overhear a conversation.
- A child goes missing.
- A person working for LFC Foundation or partner organisation passes on information.
- You observe concerning behaviour or see actions or visible marks on a 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.

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

Appendix 1 – explains the different types of abuse and safeguarding concerns.

Guiding principles

Child-Centred Approach

The safety, welfare, and wellbeing of children and young people are our highest priority in every decision and action.

Shared Responsibility

Safeguarding is everyone's responsibility. All staff, volunteers, and partners must actively contribute to creating a safe environment.

Prevention First

We take a proactive approach to identify risks early and implement measures to prevent harm, abuse, neglect, or exploitation.

Empowerment and Voice

Children and young people should feel encouraged, listened to, and supported to express their views and concerns.

Safe Environments

We ensure all LFC Foundation activities and spaces are physically and emotionally safe, inclusive, and respectful.

Continuous Improvement

We regularly review and update safeguarding practices to maintain the highest standards and comply with legislation and best practice.

Transparency and Accountability

All safeguarding concerns are taken seriously, reported promptly, and managed in line with clear procedures.



Legal & policy framework

Our policy and procedures are reviewed and updated on an annual basis in accordance with legislation and statutory guidance:

- Children Act 1989 (2004)
- Working Together to Safeguard Children 2023 is statutory guidance issued by the DFE for all organisations working with children.
- Keeping Children Safe in Education 2025
- Premier League Safeguarding Standards 2025 2026
- Safeguarding section of The Premier League Rules
- The FA safeguarding policy and regulatory framework
- The FA Charter Standard Safeguarding Policy and Procedures

By ensuring our safeguarding policies and procedures are consistent with football authority regulations, legislation, statutory guidance and current best practice.

By ensuring our safeguarding ethos, culture and vigilance are embedded at the heart of everything we do.

Local Safeguarding Partnership Policies and Procedures:

Where we identify concerns for children and young people:

- A referral and any subsequent action to safeguard and promote a child's welfare will be undertaken in accordance with our Local Safeguarding Children Partnership policies and procedures. As part of the multi-agency process, we work in partnership with social care and other agencies.

Safeguarding and welfare 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 at LFC Foundation.

Definitions

Child: Any person under the age of 18, in line with the Children Act 1989.

Abuse: A form of maltreatment of a child or adult at risk. Somebody may abuse or neglect a person by inflicting harm or by failing to act to prevent harm.

Allegation: when it is claimed that someone working with children has harmed a child, may have harmed a child, committed a criminal offence against a child, or behaved in a way that suggests they may pose a risk to children. This includes concerns about behaviour outside of work that could impact their suitability to work with children. (*See LFC Allegations Policy and Low-Level Concerns Policy on The Source or via LFC Safeguarding Team*)

Designated Safeguarding Lead (DSL): The individual responsible for overseeing safeguarding practices, receiving concerns, and ensuring appropriate action is taken.

Disclosure – when a child shares information that they are being harmed, have been harmed in the past, or are worried that somebody else is being harmed. This can happen through words, actions, drawings or behaviour.

Disclosure and Barring Service (DBS): A UK government service that helps employers make safer recruitment decisions by providing information about criminal records.

Extremism - is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. It also includes calls for the death of members of the armed forces, whether in this country or overseas.(KCSIE, 2025)

LADO (Local Authority Designated Officer): A person responsible for managing and overseeing allegations made against adults who work with children.

Radicalisation - Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups (KCSIE, 2025).

Safeguarding: The action taken to promote the welfare of children and adults at risk and protect them from harm, abuse, and neglect.

Whistleblowing: The act of reporting concerns about wrongdoing or risks of harm in the workplace, including safeguarding concerns.

Scope

This policy applies to all adults who work for or on behalf of LFC Foundation including but not limited to; those who are contracted as permanent or fixed term, casual, agency, contractors, volunteers, interns and people undertaking work experience regardless of their role. The policy applies to all LFC Foundation workers and participants wherever they are deployed across the world, though recognise that there will be differing legal and regulatory conditions in non-UK territories which may impact some of the policy obligations.

Where LFC Foundation enters a commercial or contractual relationship with third parties, including commercial partners, licence holders, contractors, consultants and grantees, those organisations and/or individuals are also required to uphold the requirements and principles presented in this policy. In addition, LFC Due Diligence Policy must be followed.

The workforce is required to implement the requirements contained in this policy in conjunction with LFC Foundation Safeguarding Code of Conduct.

In addition to this policy there are other Safeguarding Policies and procedures in place to protect children and other vulnerable groups. This list includes, but is not limited to;

- LFC Foundation Adult Safeguarding Policy
- LFC Allegations Policy
- LFC Low Level Concerns Policy
- LFC Recording Policy
- LFC Safer Recruitment Policy
- LFC Safeguarding Due Diligence Policy
- LFC Foundation Code of Conduct
- LFC Domestic Abuse Support Policy
- LFC Relationships at work policy
- LFC Social Media Policy
- LFC Acceptable Use Policy
- LFC Equality, Diversity and Inclusion Policy
- LFC Respect in the workplace policy
- Premier League Safer Working practices

For further information please contact LFC Safeguarding Team.

EDI Statement & additional vulnerabilities

LFC Foundation believes that the safety and well being of children is our highest priority. Every child has an equal right to be protected from harm, regardless of the following protected characteristics as outlined by the Equality Act 2010: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation .

We acknowledge that some children may have additional vulnerabilities that increase their risk of abuse or neglect. These may include, but are not limited to:

- Children with disabilities or special educational needs;
- Those from ethnically diverse communities;
- Individuals who identify as LGBTQ+;
- Children playing or working in an adult environment;
- Young carers;
- Children with care experience, care-leavers, or looked-after children;
- Children living in households affected by domestic abuse, parental mental health issues, or substance misuse;
- Children at risk of radicalisation or exploitation;
- Children who frequently go missing or live away from home.

The presence of these factors does not mean abuse will occur, but they should be considered alongside any other safeguarding concerns. Staff must use professional judgment to assess risk and apply additional safeguards where necessary.

By fostering an inclusive and vigilant environment, LFC Foundation aims to ensure that every child and young person is protected and supported, regardless of their circumstances.

EDI Statement & additional vulnerabilities

We will:

- ✓ Promote inclusive equitable and rights respecting practices
- ✓ Provide services based on fairness and equal opportunity
- ✓ Recognise, promote and celebrate diversity
- ✓ Ensure equality and diversity are considered in all safeguarding work
- ✓ Challenge discrimination, harassment and victimisation
- ✓ Deliver effective training so staff understand their responsibilities around equality and diversity

We are very clear that subjecting children to harassment, violence and or abuse risks breaching children's rights, as set out in the Human Rights Act 1998, and that it is unlawful to discriminate against children because of their protected characteristics (Equality Act 2010)

Your voice

Child Voice and Participation

LFC Foundation is committed to ensuring that children's voices, opinions, and concerns are heard across all areas of the Foundation. We recognise that involvement in sport or classroom activities or workshops can sometimes make children feel less confident to speak out.

To address this, the Club actively seeks children's views on matters that affect them, including policies, staff recruitment, and changes to facilities.

We deliver this commitment through regular feedback sessions, surveys, and participant forums, supported by staff training to create safe spaces for discussion. These measures ensure that children feel empowered to share their thoughts and raise their concerns.

Stakeholder Engagement and Feedback

LFC Foundation is committed to listening to and acting on feedback from all safeguarding stakeholders, including children, parents, staff, and external partners. We recognise that open communication is essential to maintaining trust and improving safeguarding practices.

LFC Foundation engages stakeholders through a range of methods, including regular forums, surveys, consultation meetings, and feedback sessions. These opportunities allow stakeholders to share views on policies, procedures, and operational changes.

Feedback is reviewed by the Safeguarding Team and informs continuous improvement, ensuring that safeguarding measures remain effective, inclusive, and responsive to the needs of those we support.

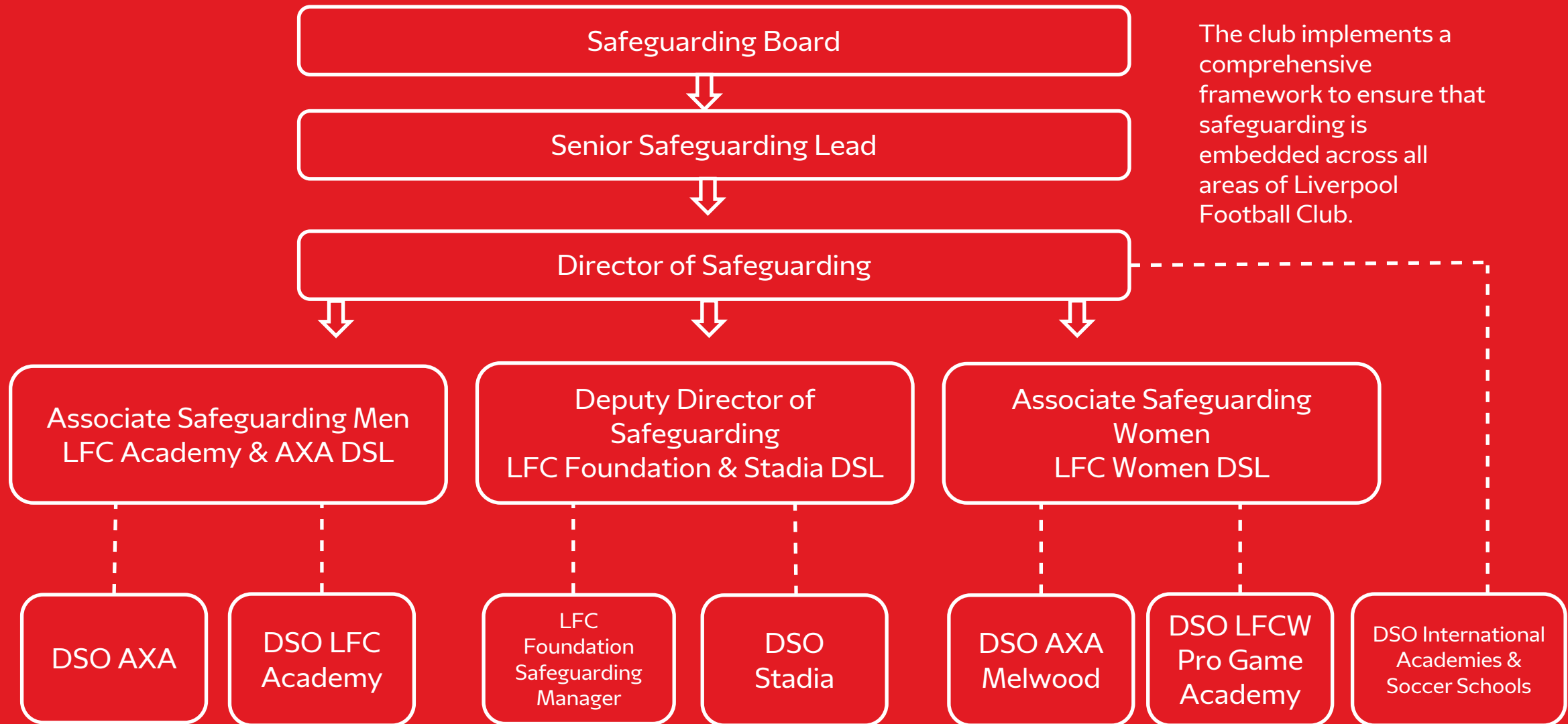


Safeguarding framework

Safeguarding framework



The club implements a comprehensive framework to ensure that safeguarding is embedded across all areas of Liverpool Football Club.



LFC Foundation Safeguarding Structure



Safeguarding responsibilities



SENIOR SAFEGUARDING LEAD

Jonathan Bamber (LFC Chief Legal & External affairs Officer) is the Senior Safeguarding Lead (SSL) for the club. The SSL is responsible for leading the Club's Safeguarding Board and overseeing the Safeguarding Framework. This includes ensuring safeguarding is embedded within the club's leadership, governance, and culture, and championing safeguarding across all levels of the club.



DIRECTOR OF SAFEGUARDING

Nicola Fryer is LFC Director of Safeguarding who is responsible for the overall development and implementation of the safeguarding strategy, safeguarding policies, safeguarding risk register, case management and safer recruitment across the club.

Safeguarding responsibilities



DEPUTY DIRECTOR SAFEGUARDING

The Designated Safeguarding Lead for LFC Foundation and LFC ETC is Lorna Duckworth, who reports directly to LFC Director of Safeguarding.

LFC Foundation DSL is also LFC Deputy Director of Safeguarding.

The DSL has strategic oversight for Safeguarding at LFC Foundation and is responsible for staff safeguarding.

Lorna.duckworth@liverpoolfc.com

07841629809



LFC FOUNDATION SAFEGUARDING MANAGER

The LFC Foundation Safeguarding Manager is Stephen Hale.

The LFC Foundation Safeguarding Manager deals with all LFC Foundation operational casework and is the first point of contact for LFC Foundation Safeguarding concerns.

Stephen.hale@liverpoolfc.com

07785646368

Our responsibility to keep everyone safe

Everyone who works or volunteers at LFC Foundation has a duty to help keep children safe. This means always acting in ways that protect people's rights, safety, dignity, and wellbeing. All colleagues and volunteers should ensure that they read this policy and understand their responsibilities to ensure the safety and wellbeing of children.

This includes:

Creating a Safe Environment

Always make sure the places where we work, play, and learn are safe. Be alert and speak up if you think something might put someone at risk.

Working Safely and Respectfully

Follow safe working practices and respect personal and professional boundaries. This means behaving in a way that sets a good example and keeps everyone feeling safe and respected.

Speaking Up About Concerns

If you see or hear something that worries you, like someone being hurt, treated unfairly, or not being looked after properly, you must take it seriously and report it (Please refer to LFC Recording Policy) at all times

There are also more specific roles who have specified duties in relation to safeguarding who can support you.



Safer recruitment & training

LFC Foundation recognises the critical importance of safer recruitment in protecting children. The Club follows government guidance outlined in Keeping Children Safe in Education (2025) to ensure that all recruitment processes are robust, consistent, and prioritise safeguarding.

This commitment applies to all individuals who may come into contact with children, whether in a paid role or voluntary capacity. LFC Foundation also has a duty to ensure that any third-party professionals working on behalf of LFC Foundation including but not limited to host families, teachers, interpreters, and mental health practitioners have completed an appropriate safer recruitment process.

Training

To maintain these standards, specific training is provided to staff involved in recruitment. Our safer recruitment process includes thorough checks, clear safeguarding responsibilities, and a commitment to creating a safe environment across all areas of the Club.

Staff are also provided with 'annual safeguarding training' in addition to bespoke training outlined in the Safeguarding Workforce development plan.

Please refer to [LFC Safer Recruitment Policy and Workforce Development Plan](#) for further details (access via [The Source](#))

Procedures

Safeguarding behaviours we expect from LFCF colleagues - good practice

Always put the welfare of the child first.

Be a role model and display high standards of behaviour and appearance

Make the activity fun, promote fairness and challenge bullying.

Only Foundation approved communication should be used to contact the parents of children.

Please refer to Appendix 2 for Safer Working Practice Guidance

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.**

Know LFC Foundation policies and procedures for safeguarding

Always use language that is child friendly and socially acceptable.

Avoid unnecessary physical contact and be aware of personal space.

Treat all children equally and with respect and dignity regardless of protected characteristics

Always act in the best interest of all children

Never promise a child that you will keep a secret.

If physical support is required, this should be in an open environment with the child's consent.

Good practice

Accident prevention

LFC Foundation is committed to creating a safe environment that minimises the risk of accidents and injuries for all participants. Accident prevention is a key part of safeguarding and is embedded in our daily operations and risk management processes.

Our Approach to Accident Prevention

- **Risk Assessments:** Comprehensive risk assessments are carried out for all activities, venues, and events to identify and mitigate potential hazards.
- **Safe Facilities:** Regular inspections and maintenance ensure that all LFCF facilities meet health and safety standards.
- **Qualified Staff:** Staff receive training in safeguarding and health and safety, including first aid and emergency procedures.
- **Supervision Standards:** Appropriate ratios of staff to participants are maintained to ensure safe oversight during all activities.
- **Emergency Response:** Clear procedures are in place for responding to accidents, including immediate medical assistance and reporting protocols.
- **Continuous Review:** Accident data and near-miss reports are monitored to inform improvements and prevent recurrence.

By prioritising accident prevention, LFC Foundation ensures that safeguarding extends beyond protection from abuse to include physical safety and wellbeing.

Risk assessment and accidents are recorded on KOPS. Please see your line manager if you require assistance.

Travel, trips, residentials and tournaments

LFC Foundation is committed to ensuring that all trips, tours, and tournaments are planned and delivered with the highest safeguarding standards. These activities present unique risks, and LFC Foundation take proactive steps to protect the welfare of all participants.

Our Approach

- **Comprehensive Risk Assessments:** All trips and events undergo detailed risk assessments covering travel, accommodation, supervision, and emergency procedures.
- **Parental Consent and Information:** Written consent is obtained from parents/carers, and full itineraries and contact details are shared in advance.
- **Safer Recruitment and Supervision:** Only appropriately vetted and trained staff supervise trips, maintaining clear ratios and accountability.
- **Clear Codes of Conduct:** Behaviour expectations for staff and participants are communicated before departure, and briefings of expectations delivered including safeguarding and online safety rules.
- **Medical and Welfare Planning:** Health needs, medication requirements, and emergency contacts are documented and managed throughout the trip.
- **Reporting and Escalation:** Any safeguarding concern during a trip must be reported immediately to the Safeguarding Lead and managed in line with Club policy.

These measures ensure that trips, tours, and tournaments are safe, inclusive, and enjoyable, while prioritising the wellbeing of every child and young person.



Good practice

Consent in LFC Activities and Image Use

Liverpool Football Club Foundation is committed to ensuring that all activities involving children are conducted with full respect for their rights and privacy. Consent is a fundamental safeguarding principle and applies to participation in activities, communication, and the taking and use of images.

Our Approach to Consent

- **Activity Participation:** Written consent must be obtained from parents/carers (or the individual if over 18) before participation in any Foundation activity.
- **Image and Media Use:** Separate, explicit consent is required for taking and using photographs, video, or audio recordings. This includes specifying how and where images will be used (e.g., social media, marketing, internal reports). Please use LFC Foundation Image Consent Forms.
- **Transparency:** All consent forms must clearly explain the purpose of the activity and any media use, ensuring individuals and parents/carers understand their rights.
- **Right to Withdraw:** Participants and parents/carers can withdraw consent at any time, and the Club will respect and act on this immediately.
- **Secure Storage:** Consent records are securely stored in line with data protection legislation and Club policy.

These measures ensure that participation and media use are safe, respectful, and compliant with safeguarding and privacy standards.

If there are occasions where it is difficult to gain consent, then please contact LFC Foundation Safeguarding manager for assistance.

Poor practice

Poor practice takes place when colleagues or volunteers do not adhere to LFC Foundation's standards or code of conduct in their working practice.

An individual may not be aware that poor practice is taking place and may deem their behaviour as 'acceptable'. If poor practice is allowed to continue and is not addressed, this can cause harm and result in abuse.

It is therefore vital that all staff report any incidents of poor practice before the behaviour results in abuse.

Poor practice is unacceptable and will be treated seriously and with the appropriate action, ranging from training and support to disciplinary action where appropriate.

Poor practice can become a low-level concern if it involves an adult's behaviour toward a child that could indicate a breach of professional boundaries or early warning signs of harm.

Poor practice examples

This list is not exhaustive

Continued and unnecessary preferential treatment

Allowing hazing practices to go unreported

Putting performance over the safety of players

Failure to report welfare or Safeguarding incidents

Taking advantage of or pursuing a situation that has a power imbalance

Allowing abusive or concerning practices to go unreported (e.g., a coach who ridicules and criticises players who make a mistake during a match)

Placing children or young people in potentially compromising, uncomfortable situations with adults (e.g., unprofessional use by a coach on social media with young players)

Ignoring health and safety guidelines (e.g. not wearing seat belts in club transport, allowing young players to set up goal posts unsupervised by adults)

When insufficient care is taken to avoid injuries (e.g., by excessive training or inappropriate training for the age, maturity, experience, and ability of players)

Using foul and abusive language to children, adults at risk or other adults (e.g., abusive language towards match officials)

Being alone in changing rooms, toilets or any private spaces used by children

For further details please refer to LFC Low Level Concerns Policy and LFC Allegations Policy.

Low level concerns

A low-level concern is any concern about an adult's behaviour, no matter how small, and even if no more than a 'nagging doubt,' is a sense of unease as to the adult's behaviour particularly towards or around children.

A Low-level Concern is where an adult has acted in a manner that:

- Is not consistent with the LFC Foundation values or Safeguarding Policies and Procedures
- and/or relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.
- meets the thresholds as defined by The FA Safeguarding concerns in the professional Game, Referral and Threshold document.
- Does not meet the allegations threshold or is not considered to be serious enough to refer to the LADO

For further details please refer to LFC Low Level Concerns Policy and LFC Allegations Policy.

Low Level concerns are part of a spectrum of behaviour including;

- Inadvertent or thoughtless behaviour
- Behaviour that may look or be considered as inappropriate
- Behaviour that is intended to enable abuse

Allegations against staff

Where an allegation of abuse or poor practice is raised against a staff member or volunteer, this must be reported to the Director of Safeguarding or Deputy Director of Safeguarding or via My Concern selecting the DSL notification group.

Internal policies including but not limited to LFCF Safeguarding policy, LFCF allegations policy, LFC Low level concerns policy and People and Culture policies will be followed.

LFC Foundation expects adults to report concerns about their own behaviour or that of other adults (colleagues, contractors, volunteers). Self referrals are encouraged to create a culture of transparency, openness and trust.

Self referral

LFC Foundation expects adults to report concerns about their own behaviour or that of other adults (colleagues, contractors, volunteers). This may be when poor practice is identified

All colleagues and volunteers have a responsibility to maintain the highest standards of conduct when working with children. If you identify any aspect of your own practice that may fall short of these standards, or could reasonably be questioned, you must self refer to your line manager or the Safeguarding Team without delay. This proactive approach supports LFC Foundation's commitment to creating a safe and positive environment for everyone.

Self reporting is encouraged to create a culture of transparency, openness and trust.

All colleagues and volunteers regardless of role must inform the Safeguarding Team promptly of any matter that could affect their suitability to work at LFC Foundation. This includes, but is not limited to:

- Reprimands, warnings,
- Cautions, or convictions.
- Any investigation or enquiry by a statutory agency.
- Circumstances where a child in your care becomes subject to care proceedings.

Upon notification, the Safeguarding Team will conduct a risk assessment and determine next steps. This may include updating criminal record checks, initiating an internal investigation, and liaising with statutory services where appropriate.



Whistleblowing, complaints and reporting poor practice

What is Whistleblowing?

Whistleblowing is the reporting of suspected malpractice, wrongdoing, or dangers in relation to the Club's activities.

LFC Foundation is committed to maintaining the highest standards of safeguarding and recognises that there is always a potential risk of things going wrong and poor practice occurring, whether knowingly or unknowingly.

We have a responsibility to identify such risk promptly and take proactive steps to reduce them.

A culture of openness, ability to speak up, and accountability is essential to prevent such situations or to address them if they do occur.

If you believe there is a need to raise a serious concern (whistleblowing), you must refer to LFC Whistleblowing Policy.

Our full Whistleblowing Policy can be accessed by staff via The Source in the 'Looking after our People Policies section.

Formal complaints procedures can be accessed via the LFC Foundation website, complaints will be acknowledged within 3 working days of receipt and a full response within 21 days.



Procedures PREVENT

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.

Indicators

The following behaviours (not exhaustive) may indicate that a person is at risk of being radicalised. People working at LFC Foundation are asked to be alert to:

- Disclosures by children and adults of their exposure to extremist actions, views or materials of others outside the LFC Foundation, 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

LFC Policy Statement with regard to PREVENT

Liverpool FC and LFC Foundation 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 and LFC Foundation aims to protect vulnerable individuals from being radicalised or exposed to extremism, by identifying who they are and providing them with support. LFC and LFC Foundation supports the 'PREVENT' agenda in our commitment to ensure that safeguarding is everyone's responsibility.

Safeguarding from Radicalisation is no different to protecting children or adults at risk from harm.



LFC Foundation PREVENT ethos & practice

Extremist Ideologies

There is no place for extremist views of any kind at LFC Foundation, whether from internal or external sources. LFC Foundation 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 Foundation, players, participants and fans.

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

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 LFC Foundation will receive PREVENT awareness training appropriate to their role. This involves how to report any concerns that they might have if someone is showing extremist views or might have been radicalised" online or offline.

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.

External Speakers

LFC Foundation aim to protect from any extremist views being promoted within the Media Policy and ensuring that external speakers are either approved by The Premier League or are reviewed before delivery. The safeguarding team will be involved in checking materials and content before delivery, and a staff member who has completed PREVENT awareness training and / or a member of the safeguarding team will be present at the sessions.

LFC Foundation PREVENT ethos & practice

Online Safety

Social media is a common tool for sharing content associated with extremism. This is used to share propaganda, radicalise and recruit for their cause. Ensure that you follow the Social Media Policy and monitor and look for behaviours that may be concerning if involved in activities that involve children or adults using social media via computers, iPads or mobile phones.

Web Filtering

LFC Foundation 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.

Acceptable Use IT

All people who are employed full time, casual and volunteers who work with children or adults at risk at Liverpool FC Foundation must follow the Acceptable Use Policy to reduce the risk of extremist views and content being distributed by LFC Foundation staff members.

Reporting

All concerns relating to radicalisation and extremism must be reported as per all other Safeguarding concerns, as detailed on the next page.



Procedures responding to disclosures, allegations and concerns

The 5 r's - an easy way to remember how to deal with a disclosure

In the event that a child makes a disclosure of abuse or an allegation, it is important to remember the below steps.

RECOGNISE

Recognise signs of abuse or neglect, or behaviour that indicates abuse.

RESPOND

Respond calmly and positively, reassuring the person that they have done the right thing in speaking to somebody.

REPORT

To the Designated Safeguarding officer, Designated Safeguarding Lead or Director of Safeguarding

RECORD

Record facts and observations clearly as per guidance in LFC Recording Policy.

Record on my concern, to DSL/ DSO or via the website.

REFER

The DSL will refer to external agencies if required.

Please review and adhere to the LFC Recording Policy.

What to do if you have a concern?

WHAT

- If a child is in immediate danger or at risk of significant harm, **call 999**
- **REPORT TO LFC SAFEGUARDING TEAM** – who will deal with all referrals that might need to be made to partner agencies and external bodies.

WHEN

- Within **24 hours** or immediately if a child is at risk of harm or there is an emergency situation

HOW

- **My Concern** (if you have received access and training)
- Contact the **Designated Safeguarding Officer** for your area of the club as per the departmental safeguarding posters
- Website: **[Liverpool FC – Report A Safeguarding Concern](#)**

Please refer to LFC
Recording Policy
and LFC
Safeguarding
Handbook for
further guidance



Referrals and confidentiality

LFC Foundation is committed to maintaining confidentiality for all parties involved. Any information shared will be strictly on a 'need-to-know' basis and handled in line with data protection and safeguarding best practice. All concerns are recorded on the club's secure case management system and are handled in accordance with the Data Protection Act 2018 and UK GDPR.

All colleagues and volunteers must ensure that confidentiality protocols are followed and that information is shared appropriately. However, no adult should promise to keep secrets when a disclosure is made.

When a safeguarding concern involving a child or young person arises, LFC Foundation may share relevant information with The FA, statutory agencies, external organisations, or other football clubs where a trusted safeguarding professional is identified.

Such referrals will only be made when it is necessary to manage an ongoing risk to an individual or group effectively. Wherever possible, the Club will seek consent from a parent or carer before making an external referral. However, if obtaining consent would increase the risk or potential harm to the child, consent will not be sought.



Sharing information and data protection

The welfare of the child is paramount: LFC Foundation will support any team member who shares information in circumstances where the individual believes that by not sharing the information a child would be put at risk of harm.

Confidentiality matters: Always handle personal information with care and respect. Do not share details casually or outside safeguarding protocols.

Be clear and honest: Never promise to keep secrets. Explain that some information must be shared to keep people safe.

Follow guidance: Information sharing must comply with:

- Working Together to Safeguard Children 2023 (updated May 2025)
- Information Sharing: A Guide for Practitioners (May 2024)
- UK GDPR 2018 and Data Protection Act 2018

Consent and transparency: Seek consent wherever possible and explain:

- What will be shared and why
- Who will see it and how it will be used
- That consent can be withdrawn at any time

When consent is not needed: Child protection concerns must be shared without delay with the Liverpool FC Safeguarding Team.

Best practice principles:

- Share only where there is a legal justification and what is necessary, relevant, accurate, and timely
- Keep records of what you share, with whom, and why (share only with relevant people)
- Share securely and proportionately - The system that LFC uses for this is My Concern.

Safeguarding is everyone's responsibility: No one should hold concerns alone. All concerns however seemingly minor must be reported to the Safeguarding Team, who may refer these concerns to The F.A. statutory, external agencies or other football clubs.

Policy review and adaptation

Commitment to Compliance

LFC Foundation is committed to ensuring that this Safeguarding Policy remains compliant with all relevant legislation, statutory guidance, and governing body requirements.

Review Schedule

The policy will be reviewed:

- **Annually**, at the end of each season;
- **Earlier if required**, following:
 - Changes in legislation or statutory guidance;
 - Updates to governing body rules;
 - A significant safeguarding incident or other major event

Adaptability in Exceptional Circumstances

LFC Foundation recognises the need to adapt safeguarding practices in response to exceptional circumstances. For example, during the COVID-19 pandemic, processes were amended to reflect lockdowns and remote working arrangements. While LFC Foundation has now returned to standard working practices, we remain committed to ensuring safeguarding remains a priority. Should another pandemic, lockdown, or similar transformative event occur, our processes will be reviewed and adapted promptly to maintain robust safeguarding standards.

Responsibility for Review

The designated leads for policy review are:

- Nicola Fryer
- Lorna Duckworth

They are responsible for ensuring that this policy is reviewed annually or sooner if legislative changes or significant events require immediate action.

Appendices

Appendix 1

Signs & types of abuse and safeguarding concerns

Signs of abuse

If you recognise any of the below indicators of abuse, you should act upon it and record on my concern and discuss with your Designated Safeguarding Lead.

- Unexplained bruises or injuries
- Unkempt appearance
- Self-harm
- Sudden weight gain or loss
- A deterioration in hygiene
- A change in behaviour or confidence
- You may be told the person is being abused, by them or otherwise
- Becoming quiet and withdrawn
- Not responding to communications
- No longer attending or enjoying a session
- Lack of medical attention or treatment to injuries
- Fear of a particular individual or group of people
- A person's belongings or money going missing
- Lack of suitable kit for the activity
- A parent or carer always speaking on the person's behalf

Refer to the LFC Handbook on The Source for further information or contact your Designated Safeguarding Lead

Abuse categories

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. Children may be abused by:

- family members
- friends / another child or children
- people working or volunteering in organisational or community settings
- people they know
- strangers.

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 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

Quoted from 'Keeping Children Safe in Education 2025'



Additional safeguarding categories

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, and 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).

Quoted from 'Keeping Children Safe in Education 2025'



Additional safeguarding categories

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

Online Safety

Please refer to **Acceptable IT use policy and Social media Policy**.

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.

Esport

LFC Foundation applies the same high safeguarding standards to Esports as in all other areas. Although LFC Foundation do not have an Esports team, participants may take part in Premier League Esport competitions. If this happens the LFC Foundation Safeguarding Manager oversees Esports activities, ensuring compliance with existing policies such as safer recruitment, risk assessments, and transport guidelines. Internal best practice will be established in collaboration with Legal, HR, Safeguarding, and Esports staff to maintain safe operations in this evolving area. Particular emphasis is placed on online safety and digital conduct, including secure communication, monitoring of gaming platforms, privacy protection, and clear reporting routes for concerns. These measures are regularly reviewed to ensure they remain robust and responsive to emerging risks.

Online Safety Principles

- All communication on gaming platforms and social media must be respectful and appropriate.
- Online environments will be monitored and moderated to identify and address safeguarding concerns.
- Personal data and privacy must be protected in line with Club policies and legal requirements.
- Any inappropriate behaviour or safeguarding concern online must be reported immediately to the Safeguarding Lead.



Additional safeguarding categories

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

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 People & Culture Team and Safeguarding teams can and will help.

Quoted from 'Keeping Children Safe in Education 2025'



Additional safeguarding categories

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

Sexual Violence and Sexual Harassment

LFC Foundation 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.

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 Foundation should be aware that mental health issues 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 Foundation Safeguarding policy, and speaking to the Designated Safeguarding Lead or Designated Safeguarding Officer. LFC Foundation deliver mental health programmes with staff that are specialist trained.

Quoted from ‘Keeping Children Safe in Education 2025’



Additional safeguarding categories

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

Hate Crime

A hate crime is any incident or criminal offence that is motivated by hostility or prejudice based upon the victims:

- Disability
- Sexual orientation
- Race
- Transgender identity
- Religion or beliefs

Hate crime can take many forms, including Physical attacks, such as physical assault, damage to property, offensive graffiti and arson, racist language

Serious Violence

All people working at LFC Foundation 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.

County Lines

County Lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the United Kingdom, using dedicated mobile phone lines or other form of 'deal line'. They are likely to exploit children or vulnerable adults to move and store the drugs and money, and they will use coercion, intimidation, violence (including sexual violence), and weapons.

Quoted from 'Keeping Children Safe in Education 2025'

Additional safeguarding categories

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

Forced Marriage

A forced marriage is one where both parties do not or cannot consent to the marriage, and pressure, coercion or abuse is used to make them marry. Children may be married at a very young age, well below the age of consent in England and Wales. A forced marriage is not the same as an arranged marriage, where both parties give free and informed consent.

Contextual Safeguarding

Contextual Safeguarding is an approach that considers the wider environments where children and young people spend time and how these settings can influence their safety and wellbeing. While traditional safeguarding methods have focused primarily on risks within the home, such as harm from parents, carers, or trusted adults, this approach recognises that significant harm can also occur in community spaces, schools, online platforms, and peer groups.

Within a football setting, this includes places such as training grounds, matchday environments, team travel, and online interactions through social media or gaming platforms. These contexts can present risks from peers, adults, or others who may seek to exploit or harm young people.

By acknowledging the impact of these social and public contexts, Contextual Safeguarding aims to identify and address risks that arise outside the family environment. This approach looks beyond individual behaviour and focuses on creating safer spaces and systems, ensuring that interventions target the environments and processes that shape children's experiences whether that's in the stadium, during away fixtures, or in digital spaces linked to the Club.

Appendix 2

Safer working practice guidance

Additional safeguarding categories

Ratios

LFC Foundation follow The F.A and NSPCC safeguarding best practice which dictates that adults (over-18s) must always be present when activity takes place for children.

The numbers of adults present depends on three main factors:

- The age of the children involved;
- The degree of risk the activity, location and or venue present;
- Whether there are additional supervision or support needs of some or all the participants e.g. disability or age.

The lower the age of the participants, the higher the ratio of staff must be. If the activity is mixed gender, male and female staff should be available.

Whatever the age of the children and type of activity, a minimum of two DBS checked coaches/adults must always be present. This ensures at least basic cover in the event of an incident.

If the children have additional needs e.g. learning needs or a disability the ratio must be higher to ensure you can meet the specific needs of any given group. A risk analysis identifies programmes with additional vulnerability e.g. looked-after children, those in care, those requiring mental health support, physical and learning difficulties. LFC Foundation will carry out appropriate risk assessments to ensure there is always an appropriate staff-to-participant ratio with respect to needs and age.

Remember: if using young leaders (under-18) or coaches aged 16-17 they cannot be considered as adults. In fact, you will need more adults not less to supervise because you have more under-18s in your group.



Online guidance

Remote training, teaching and engagement Safe Online Communication

LFC Foundation is committed to ensuring that all virtual interactions are conducted safely and professionally. All online communication must be open, transparent, and for the purpose of your role. Sessions should take place in an observable and interruptible environment, using LFC Foundation approved platforms linked to workplace accounts. Personal social media accounts must remain private and inaccessible to participants.

For under 18s, parents or carers must be informed and provide consent for any online contact. One-to-one sessions should only occur with a parent or carer present and visible during the session and must be agreed with the Safeguarding Team in advance.

Key Principles

Communication must be professional, open, and transparent.

Use only LFC Foundation approved platforms linked to workplace accounts.

Sessions must be observable and interruptible; avoid private or inappropriate settings.

Participants should be suitably dressed as if meeting in person.

Personal social media accounts must remain private and inaccessible.

Parents/carers must be informed of all online contact with under 18s.

One to one sessions require parental presence and prior approval.

Please gain approval from LFC Foundation Safeguarding manager before conducting online sessions.



Appendix 3

External contacts

External contacts

If you have a concern outside of office hours, or have concerns for the safety of a child, young person or an adult at risk then please contact;

Emergency Services:

999

Merseyside Police:

0151 709 6010

Childline:

0800 1111

Samaritans:

116 123

If concerns relate to the safety of a child, then please contact the Local Authority Safeguarding Board:

Local Authority	Telephone Number
Knowsley Council	0151 443 2600
Liverpool City Council	0151 233 3700
Sefton Council	0345 140 0845 or 0151 934 3555
Wirral Council	0151 606 2008 or 0151 677 6557
St Helens Council	01744 676767

External contacts

[Hub of Hope](#) national mental health database, bringing help and support together in one place, with a focus on mental health.

Hub of Hope is for everyone and anyone. We all have mental health, so we all need to know the routes to support. The Hub of Hope is not restricted by age or gender.

The hub of hope is available to anybody at hubofhope.co.uk and is a free, downloadable app on iOS and Android devices. Once you have downloaded the app, the user can filter by category of service and postcode.

Mental Health / Bereavement

Samaritans – 116 123

Papyrus – teenage suicide / mental health - [0800 068 4141](tel:08000684141)

NSPCC – Childline – [0800 111](tel:0800111)

www.childhoodbereavementnetwork.org.uk



L.F.C.

Foundation

External contacts

Domestic Violence

National Domestic Violence Hotline.... Freephone 24 hour run by Refuge on 0808 2000 247

Alcohol and Drugs

Alcoholics Anonymous – [0800 917 7650](tel:08009177650)

Talk to FRANK – [0300 123 6600](tel:03001236600)

E Safety

Think you Know - www.thinkuknow.co.uk/parents/

Childnet - www.childnet.com/blog/keeping-children-happy-and-safe-online-during-covid-19

EsafetyMatters.com

Young Minds - [0808 802 554](tel:0808802554)

Loneliness

Age UK – [0800 678 1602](tel:08006781602)

Samaritans - [116 123](tel:116123)

MIND – www.mind.org.uk

Poverty

Food Poverty, Claiming Benefits, Debt Advice

Foodbanks – google your local ones or The Trussell Trust – [0808 208 2138](tel:08082082138)

Citizens Advice for benefits – [0345 404 0506](tel:03454040506)

Step Change – for Debt advice – www.stepdebtsupport.co.uk
www.fuelbankfoundation.org/



L.F.C.

Foundation

External contacts

Football Organisations

Contact the FA
safeguarding@TheFA.com - 0800 169 1863



Football Organisations

Contact the FA
safeguarding@TheFA.com - 0800 169 1863



Football Organisations

Contact the FA
safeguarding@TheFA.com - 0800 169 1863



Appendix 4

Oversight and management of safeguarding

Oversight and management of safeguarding

LFC Foundation safeguarding policy and procedures include responsibility for oversight and management of safeguarding and lines of accountability for safeguarding matters. This includes:

The Board's ultimate responsibility for leadership and oversight of safeguarding - LFC Foundation trustees

A designated Trustee with leadership responsibility for LFC Foundations safeguarding arrangements - Vicky Gowan

The Head of LFC Foundation responsible for ensuring that appropriate arrangements are in place for the day-to-day management of safeguarding - Matt Parish (CEO) delegated to Colin Contini (Director of Programmes)

A Designated Safeguarding Lead (DSL) responsible for leading on the implementation of LFC Foundation's safeguarding arrangements and for raising safeguarding awareness within LFC Foundation who, in respect of their safeguarding responsibilities, has direct access to the Designated Trustee - Lorna Duckworth (DSL Foundation/ETC)

There are also Safeguarding officers that oversee all programmes.

The responsibilities of heads of teams and other management roles - Stephen Hale (LFC Foundation DSM)

The responsibilities of all staff and volunteers - All Staff and volunteers as stated in their job description or volunteer description.

The expectation that everyone will work together to ensure there is a collaborative, cohesive, multidisciplinary approach to promoting and protecting the safety, welfare and wellbeing of children and adults at risk.

Appendix 5

Management of safeguarding incidents

Management of safeguarding incidents

LFC Foundation safeguarding policy and procedures make specific provision for the management of safeguarding incidents including concerns, complaints and allegations against staff, volunteers, and Trustees (including low-level concerns). This includes:

- a) setting out the duty of care owed to Beneficiaries. (See LFC Foundation Safeguarding Structure).
- b) allocation of responsibility for the oversight and management of safeguarding incidents - The LFC Foundation Designated Safeguarding Officers and LFC Foundation Safeguarding Manager oversee and manage cases.

LFC Foundation Designated Safeguarding Lead oversees all LFC Foundation/ETC cases, and will triage, review and submit a rationale for closure.

LFC Foundation Designated Safeguarding Lead liaises with LFC Director of Safeguarding to Lead Staff cases.

- c) an impartial investigation process for dealing with safeguarding concerns LFC Foundation DSL and Director of Safeguarding use a triple lock system which involves, suggesting closure, reviewing the case and agreeing to a case closure. A collective decision will be taken when making an external referral.
- d) procurement of external and/or independent expertise as necessary - An independent Safeguarding consultant / LADO's / Premier League and F.A. Safeguarding Leaders will be contacted for advice when deemed necessary.
- e) thorough record keeping demonstrating that all concerns raised have been taken seriously and dealt with in accordance with the applicable policy and procedures - LFC Foundation use a case management system called My Concern which documents the case along a time line of events. Please refer to LFC recording policy.
- f) provision of support for individuals affected by or reporting concerns and for those subject to a concern or allegation - Appropriate policies will be followed to support individuals involved in a case. The case will be logged on My Concern and the DSL will oversee the case to ensure that all signposting and relevant policies are utilized to support all involved.
- g) communication with stakeholders, including the parties affected by the incident, about the process and outcome - The case leader will communicate with all parties involved in a case, all of which will be logged on My Concern.
- h) consequences for breaches, including disciplinary procedures and dismissals LFC Foundation will follow internal policies including but not limited to; Allegations Policy, Low Level Concerns Policy, Whistle Blowing Policy and Disciplinary Policy.

Appendix 6

Revision history

Version	Revision Date	Author	Summary of Changes
4	14 th December 2023	Nicola Fryer Emma Higgins	Adult at risk replaces the term vulnerable adult throughout the policy. Section 2 – Premier League definition and Children’s Act added. Section 5 – KCSIE (2023) definitions added. Addition of child on child abuse and FGM. Section 8 – Addition of consent and Privacy Policy link.
			Appendix 1 – Addition of Lorna Duckworth as DSL. Appendix 2 – Addition of LFC Foundation DSL, Recording Policy and Low Level Concerns Policy.
	14 th December 2023	LFC Foundation Board of Trustees	Approved by the Board of Trustees
5	16 th April 2024	Nicola Fryer (Director of Safeguarding)	LFC Foundation Emerging Talent Centre added to ensure compliance with PGAAC.
5	25 th September 2024	Nicola Fryer (Director of Safeguarding)	No changes. Trustees signed off continuation of policy whilst reviews are ongoing due to no major changes in KCSIE 2024
6	31 st January 2025	Nicola Fryer (Director of Safeguarding)	Changes as a result of KCSIE (2024) and LFC Foundation annual review process. Section 2 – What is Safeguarding? Is split into children and adults sections with definitions of each. Working Together (2023) definition of safeguarding replaces Children’s Act (1989) definition. Section 3 – Subsections include children, adults at risk of harm and other vulnerable people. Section 4 – Title changed to Safeguarding at LFC Foundation Section 5–Categories of abuse listed for children and adults with definitions moved to appendices. Section 6 – KCSIE (2024) definition of radicalisation and extremism added Section 7 – Recruitment and Training separated with more detail, and due diligence added following feedback from annual review. Section 8 – title change to Data Protection and Information Sharing containing new information. Section 9 – LFC Safeguarding Team – Information added to role of DSL and Safeguarding manager.

Version	Revision Date	Author	Summary of Changes
			<p>Section 10 – Asking for Help changed to Reporting concerns about a child or adult. New reference to LFCF Recording Policy.</p> <p>Section 11 – Low level Concerns and Allegations. New content refers to Recording policy, Allegations and Low Level Concerns and how to report.</p> <p>Appendix 1 – children – Categories of abuse definitions</p> <p>Appendix 2 – Additional Safeguarding categories of abuse</p> <p>Appendix 3 Adults – Definition and Categories of abuse as defined in The Care Act 2014</p> <p>Appendix 4 – External contacts</p> <p>Appendix 5 – previously appendix 1. Addition of Vicky Gowan as Safeguarding trustee</p> <p>Appendix 6 previously appendix 2. Clarification or role of DSL and Safeguarding Manager.</p> <p>Appendix 7 – Revision history moved</p>
7	24 th November 2025		Whole policy re write in line with Clubs Safeguarding Policy
			Slide 4 – Policy includes new information to provide clarity
			Slides 14-15 - Additional vulnerabilities added
			Slide 16– Beneficiary feedback referenced following Barnardo's recommendation
			Slides 20 – To introduce Safeguarding Trustees
			Slides 20 – To introduce Safeguarding Trustees
			Slides 25-33 – Procedures section to give further guidance for Safer Working Practices
			Slides 34-37 – PREVENT additional information added rather than separate PREVENT policy
			Slides 41 – 43 – Additions for CCOP standards
8	4 th February 2026	LFC Foundation Board of Trustees	Approved by the Board of Trustees

POLICY AT A GLANCE – NON-NEGOTIABLES



- ➔ The welfare of the child comes first
- ➔ Safeguarding is everyone's responsibility. If you see, hear or suspect something report it.
- ➔ In an emergency call 999 and report immediately, otherwise inform the DSL or DSO as soon as possible, but no later than 24 hours.
- ➔ Report on My concern, via LFC Safeguarding website or calling the DSL or DSO.
- ➔ Share safeguarding concerns and information with the Safeguarding Teams only.
- ➔ 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 link opposite; [Keeping children safe in education 2025: part one information for all school and college staff](#)

 Policy Ownership
Safeguarding

 Version 4
Nicola Fryer
Director of
Safeguarding

 E-Learning c/o Premier League, LFC
Safeguarding Policy
LFC Safeguarding Handbook
LFC Low Level Concerns Policy
LFC Allegations Policy
LFC Recording Policy
LFC Social Media Policy
LFC Whistleblowing Policy

 This policy forms part
of your T&Cs

**For more information and
advice please contact The
Safeguarding Team.**

Signature N Fryer