



Plymouth Argyle Football Club  
Safeguarding Children and Young People Policy

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Endorsed by: Senior Safeguarding Manager on behalf of PAFC Board of Directors.

## Plymouth Argyle Football Club

## Safeguarding Children and Young People Policy

### Introduction

- 1.1 Plymouth Argyle Football Club (PAFC) acknowledges and accepts it has a statutory obligation and responsibility for the wellbeing and safety of all children and young people who are under PAFC's care or who are utilising PAFC facilities. Everyone working at PAFC has a duty of care to safeguard the welfare of children and young people by creating an environment that protects them from any harm.
- 1.2 The wellbeing of all children is paramount and always the first consideration, and all staff must make themselves aware of the PAF Safeguarding Children and Young People Policy, along with supporting policies. The following guidelines will be supplemented by in-service training and additional guidance accordingly.

### Definitions

- 1.3 A "child" (collectively as "children") is defined as anyone under the age of 18.
- 1.4 An "Activity" means any activity or series of activities arranged for a Child or Children by or in the name of PAFC. These are deemed to be regulated and therefore required an Enhanced DBS check to be carried out on those in regulated activity.

### Rules and Regulations

- 1.5 In the management of PAFC programmes, the implementation of this policy and the usage of its functions, PAFC will remain mindful of its' duty of care and other legal obligations such as those set out in the Health and Safety at Work Act 1974, Data Protection Act 2018, Equality Act 2010 and Protection of Freedoms Act 2012.
- 1.6 In the case of children, PAFC is also mindful of its responsibilities under the following legislation and guidance:
  - The Children Act (1989) and Children Act (2004)
  - Working Together to Safeguard Children (2023)
  - Keeping Children Safe in Education (2025)
  - Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (2018)
  - Protection of Freedoms Act (2012)
  - Data Protection Act (2018)
  - The Prevent Duty Guidance for England and Wales (2015)
  - Serious Crime Act (2015)
  - Sexual Offences Act (2003) – notably s16-s19 Abuse of position of trust.
  - FA Safeguarding Children Rules, Premier League and English Football league Rules and Guidance. PAFC is fully committed to ensuring that the best practice recommended by these regulated bodies is embedded throughout the whole of PAFC
- 1.7 PAFC also recognises its responsibility to work with multi agencies to protect vulnerable young people from harm and to respond quickly to safeguarding concerns.

1.8 In the event of a force majeure (such as a pandemic) that results in a local or national lockdown, PAFC will amend policies to include necessary measures at that time to ensure the safety and wellbeing of all children and young people who come under PAFC care.

#### Document Review

1.9 In line with all other PAFC policies, this policy will be reviewed annually, or if there are any organisational or legislative changes that require it sooner. The policy may also be reviewed or amended after a concern, incident, or allegation whereby the key aims and principles need revision to ensure they are met. All amendments are submitted to the Chief Executive Officer/Senior Safeguarding Manager for approval.

#### Aims and Key Principles

1.10 The aims of this policy are:

- To safeguard and promote the welfare of all children and young people who interact with PAFC whilst demonstrating best practice in this area,
- To provide help and support to meet the needs of children as soon as a problem emerges,
- To positively expose and uphold PAFC values regarding safeguarding children,
- To evolve a pro-active welfare programme to enable all children and young people to participate in a fun and safe environment where they are free from the fear of abuse,
- A culture where parents and other family members develop a relationship with PAFC,
- To encourage all adults to provide good role models of behaviour,
- To uphold a clear system of support, prevention, and early intervention in safeguarding matters and where necessary, prompt a response of necessary actions to safeguard the child.

1.11 Key Principles of this policy are:

- The child's welfare is, and always must be, the first consideration when concerned about the welfare of a child. Staff will always act in the best interests of the child,
- All children and young people have the right of protection from abuse, including discrimination, regardless of their protected characteristics as covered by the Equality Act 2010. These are age, gender, disability, culture, language, racial origin, religious beliefs, and sexual identity,
- All allegations of abuse or poor practice will be responded to efficiently and proportionately.
- Everyone has a safeguarding responsibility, this includes board members, staff, agencies, contracted staff and volunteers. This includes identifying concerns and taking prompt action in reporting them.

1.12 Senior Safeguarding Manager

The Senior Safeguarding Manager (SSM) has overall responsibility for the safeguarding of children and young people at PAFC. The SSM will:

- Meet monthly with the DSO to review concerns on the case management system and to review activity within PAFC that involves children and young people to ensure all policies and procedures are in line with club values.
- Undertake regular monitoring and risk assessments of activities involving children (or delegate this take to the Head of Health and Safety, or Designated Safeguarding Officer).

### 1.13 Designated Safeguarding Officer

PAFC has a Designated Safeguarding Officer (DSO) who has responsibility for the safeguarding for children and young people and PAFC, including the academy. The DSO will:

- Investigate and gather information on any allegations or concerns of abuse,
- Make the decision to refer to an appropriate statutory agency (Police, MASH),
- Liaise with the local Safeguarding Children's Partnerships,
- Ensure all staff (including volunteers) are trained on PAFC specific safeguarding procedures,
- Undertake regular training for the role,
- Regular monitoring of activities involving children and young people and liaise with staff members to ensure best practice in every department.

1.14 Anybody with a concern about a child or young person should contact the SSM or DSO direct, or if the child is at immediate risk call 999.

1.15 All staff (including contractors and volunteers) are expected to:

- Be vigilant to the signs of abuse and take responsibility in reporting concerns to the Designated Safeguarding Officer,
- Listen and take all concerns seriously,
- Maintain records accurately,
- Always abide by the club values,
- Always positively promote the health and wellbeing of children.

## 2 Safer Recruitment

2.1 As part of PAFC recruitment and selection processes, offers of work which involve working with children and young people are subject to Safer Recruitment processes.

2.2 The purpose of this policy is to ensure that it clearly defines the recruitment process that PAFC follow to ensure that only those deemed suitable to work with children and young people are successfully employed.

### 2.3 Aims and Objectives:

- To select and retain the best candidate for the given vacancy and the basis of abilities and suitability for the role,
- Ensure that all candidates are considered equally, consistently and fairly for the role,
- To ensure that no candidate is discriminated against on the basis of protected characteristics under the Equality Act 2010 (age, disability, gender reassignment, married/civil partnership, pregnancy and maternity, race, religion or beliefs, sex or sexual orientation).
- To always ensure compliance with relevant legislation and guidance that is in place at that time, this includes statutory guidance from the Department of Education, Keeping Children Safe in Education (2023),
- Ensuring that PAFC meets its commitment to safeguarding and the promotion of welfare by carrying out all pre-employment checks.

### 2.4 Roles and Responsibilities

2.5 It is the responsibility of the HR department to ensure that PAFC has effective recruitment policies in place.

2.6 It is the responsibility of the HR department, Senior Safeguarding Manager, Designated Safeguarding Officer and recruiting managers to:

- Ensure the safer recruitment procedures are adhered to,
- Ensure that all necessary checks are carried out on successful candidates (this may include social media checks and successful candidates will be made aware of when these checks will be conducted)
- Monitor the compliance of contractors and agencies in line with this policy,
- Promote the welfare of children at every stage of the recruitment process.

2.7 All staff members involved in the recruitment process of staff are responsible for complying with the provisions set out in this policy.

2.8 **Definition of Regulated Activity**

2.9 Any position that is undertaken at PAFC or on behalf of the club will amount to regulated activity if it is carried out:

- Frequently – once a week or more, or,
- Overnight – between 2am and 6am, or,
- Satisfies the period condition, meaning more than 3 days in a 30-day period and provides the opportunity for face-to-face contact.

2.10 Roles carried out on an unpaid/voluntary basis, will only amount to regulated activity if, in addition to the above, they are carried out on an unsupervised basis.

2.11 PAFC are not permitted to check the Children's Barred List unless an individual will be engaging in regulated activity. PAFC can carry out these checks via an Enhanced Disclosure and Barring Service (DBS) check for all staff engaging in regulated activity.

2.12 Nevertheless, PAFC can carry out an Enhanced DBS check on a person who would be carrying out regulated activity but for the fact that they do not carry out their duties frequently enough i.e., roles which would amount to regulated activity if they were carried out more frequently.

2.13 Whether or not a role amounts to regulated activity will be considered by PAFC to decide which checks are appropriate. It is likely that nearly all staff members within the Academy will require an Enhanced DBS check, including a Children's Barred List check.

2.14 **Disclosure and Barring Service Criminal Record checks (DBS)**

2.15 DBS checks will be carried out for all relevant postholders. New starters are strictly not permitted unsupervised access to children and young people until a satisfactory DBS check has been received by the Designated Safeguarding Officer, who's responsibility it is to ensure these checks are conducted in a timely manner. PAFC processes DBS checks via First Advantage, Know Your People.

2.16 Should a check highlight a criminal record on the individual that would deem them unsuitable to work with children and young people, the following will apply:

- The Designated Safeguarding Officer will liaise directly with the applicant. This will then be referred to the Senior Safeguarding Manager for risk assessment and final decision.
- FA disclosure Management Team will review the disclosure and decide whether it have been accepted, or not, in line with FA protocols.
- Where the applicant disputes any information contained within the disclosure and has contacted the DBS about the dispute, PAFC may defer the decision regarding the

appointment to the role until the applicant has had reasonable opportunity to have their dispute considered.

- PAFC will accept the portability of DBS certificates if the individual has joined the DBS Update Service, but only for those not governed by FA regulations.
- It is compulsory that postholders agree to a DBS re-check at a time specified by the FA. This time frame is subject to change.
- It is imperative that postholders agree to inform PAFC of any cautions or convictions in between re-checks or confirm that there are no changes before the next re-check.

2.17 Recruitment and Selection Procedure

2.18 Planning and Advertising

2.19 Before a position can be advertised, the post must have a job description/person specification which defines the duties, skills, qualification requirements and experiences relevant to the role. It will also clearly state whether DBS check will be a requirement of the role. An Authority to Recruit Form is also required to be completed.

2.20 All posts are advertised and managed by the HR department, with overall responsibility lying with the Chief Executive Officer. Some posts may be limited to internal advertising only. PAFCs

2.21 commitment to safeguarding and welfare of children and young people will be made clear on all internal and external advertisements.

2.22 Shortlisting and Interview stage

2.23 The recruiting manager will shortlist the candidates by reviewing applications against the Job Description/Person Specific.

2.24 Candidates attending at this stage will be required to provide evidence of their identity, address, and qualifications.

2.25 The stages at this part of the process can consist of a face-to-face interview, assessment centre, or both, depending on the post being advertised.

2.26 An assessment centre will be a series of activities carried out over a day or a half day that will assess the skills of the candidates in various ways such as but not limited to, verbal and numerical reasoning tests, personality profiling, role plays and skills-based activities.

2.27 An interview will be arranged by the line manager and HR department. The interview panel will consist of the line manager and at least 1 other member of staff. The same questions will be asked of all shortlisted candidates to ensure fairness and consistency. Interview questions will also cover safeguarding matters.

2.28 References

2.29 All employment offers will be subject to two satisfactory references and will be sought, with permission of the applicant, prior to confirmation of the post. At least one reference will be from the most recent employer. If the most recent employer did not involve work with children, but other previous employment did, then discretion will be used.

2.30 If the necessary references are not sought within an appropriate timeframe, the offer of employment could be withdrawn.

**2.31 Social Media Checks**

2.32 Social media checks on the individual can be carried out prior to confirmation of the post. These checks are reasonable, proportionate, and lawful measures when undertaken within a transparent safer recruitment process, in which the applicants are fully informed. These checks will be carried out on public platforms and no passwords will be required for access.

**2.33 Offers of Employment**

2.34 All offers of employment are conditional until the following are completed:

- Proof of qualifications,
- Proof of right to work in the UK,
- Satisfactory references
- Satisfactory DBS check (for required roles)

2.35 The successful applicants' personal details, including DBS check information (date of check and certificate number only) will be held by the HR department and on the Single Central Record (SCR).

**2.36 Probationary period**

During the probationary period, all employees are required to complete an induction which includes safeguarding training to a level appropriate for the role.

**3 Process for Disclosure and Barring Service Checks (DBS)****3.1 New starters**

3.2 All staff members who are offered a position that involves them working with children, will be required to undertake an Enhanced DBS check with Barred List checks where appropriate. All offers of work are subject to the outcome of this check. Where possible, this is set out in the initial job application and within the applicants offer of employment. The staff member will not be permitted to work with children until this check has been received and reviewed where necessary.

3.3 Should a DBS check be received that requires reviewing, a risk assessment will be carried out by the Senior Safeguarding Manager, HR department and Designated Safeguarding Officer. The Rehabilitation of Offenders Act and Protection of Freedoms Act should always be considered before a final decision is made.

**3.4 New starters who already has an FA DBS check or non-FA DBS check**

3.5 Where an FA DBS check is held by the applicant from a previous employer, PAFC will still require a further check if the date of the check is more than three months old. This applies to new starters

3.6 with a non-FA DBS check by a previous employer.

**3.7 Temporary staff/external contractors**

3.8 PAFC will ensure, where appropriate, these individuals have completed a DBS check via their employer. Those without, will not have unsupervised access to children during their time at PAFC.

#### 4 Training for employees, contractors and third parties

4.1 All safeguarding policies are issued to all employees, contractors, casual workers and volunteers who come into contact with children and are available to all employees on SharePoint. All new staff are also provided with a copy of Keeping Children Safe in Education (2025), Part One and Annex A. These are discussed in more detail during induction.

4.2 All staff that work in direct contact with children and young people are required to complete the 2-hour online Safeguarding in Sport course, provided via High Speed Training. This is required to be refreshed every 3 years with Continued Personal Development (CPD) conducted between these time frames.

##### 4.3 Work Experience

4.4 PAFC may offer work experience placements to young people. Whilst on this work experience, they will not have unsupervised access to children.

##### 4.5 Contractors

4.6 All external contractors who engage with PAFC will undergo suitability testing prior to the commencement of their work. This will include policies, insurance, risk assessments but not limited to.

4.7 Upon arrival at a club site, the contractor will receive a site induction which will cover safeguarding children and will be given details of PAFC values. If a contractor is carrying out work in an area usually occupied by children, this work will be undertaken when the children are not present, unless it is necessary.

##### 4.8 Service Level Agreement/Partnership Agreements

4.9 PAFC's commitment to safeguarding is outlined in any agreements and service level agreements.

##### 4.10 Disclosure and Barring Service (DBS)

4.11 PAFC is registered with DBS to conduct DBS checks on individuals where appropriate and allows for greater safer recruitment procedures to protect children and young people.

##### 4.12 Ratios and Supervision of Children

4.13 The appropriate number of staff members will always be considered for every activity, depending on the age of the children involved, the degree of risk associated to the activity, and any disability needs. The lower the age of the children, the greater the need for supervision.

4.14 A minimum of two adults will always be present during an activity, this ensures basic cover is provided in the event of something impacting the availability of one of the adults.

4.15 Where PAFC is taking responsibility for the care of children, any parents/carers should not be included in any supervision ratios.

Recommended ratios are no more than: (ratio of adults : ratio of children)

- Under 5's – 1 : 6,
- Under 8's – 1 : 8,

- Over 8 – 1 : 10  
For Academy activities, the Premier League’s Youth Development Rules prescribe a ratio of 1 : 8.
- For organised groups of children attending a match day at Home Park, the Designated Safeguarding Officer has set a minimum of 1 : 10.

#### 4.16 Lone Working

4.17 Working 1:1 with a child or young person, should only occur in exceptional circumstances. If it does occur, the staff member must seek approval and guidance from the Designated Safeguarding Officer.

#### 4.18 Scouts

4.19 Scouts identifying players under the age of 18 are issued with PAFC values and all safeguarding policies. Scouts are also expected to provide PAFC with a professional reference.

4.20 Scouts from other clubs are only permitted to attend PAFC academy fixtures in accordance with provisions from the Premier League Youth Development Rules.

### 5 Favouritism and Gifts

5.1 All staff members should take care that they do not accept any gifts that may be misconstrued as a bribe or leave the giver to expect preferential treatment.

PAFC accepts that there will be occasion in which a player or parents/carers wish to show their gratitude of their hard work in the form of a gift. However, it is unacceptable and inappropriate to receive regular gifts or gifts of a significant value. Staff should report gifts to their line manager, or the Designated Safeguarding Officer.

5.2 Staff are not permitted to give personal gifts to children or young people. This can be misinterpreted as favouritism and singling a child out. This could also be perceived by the child as expecting something in return.

5.3 Any rewards given to a child must first be agreed with the staff members line manager as part of a structured reward system.

#### 5.4 Position of Trust

5.5 PAFC academy is committed to the welfare and safety of all children and recognises the importance of communication. The academy works closely with parents, carers, schools, local authorities, and host families to ensure that this commitment is always met.

5.6 To ensure that professional boundaries are maintained, employees are not to befriend any potential, current or former players under the age of 19, this includes any of their relatives. Entering into such friendships may lead to an abuse of the employees position of trust and thus being a

5.7

breach of standards of professional behaviour and conduct that is expected of staff within PAFC values.

## 6 Photography and Image Capture

6.1 All images are taken by PAFC officials who have been briefed by the member of staff (and where possible a Club Safeguarding Officer) responsible for the activity being photographed / filmed as follows:

- Before taking images of children, parental consent is sought in writing at the start of each football season or prior to the event. Parents/Legal Guardians are responsible for informing PAFC of any change of circumstances within the season which may affect consent,
- Parents/Legal Guardians will be informed of how the image will be used. PAFC will not allow an image to be used for something other than that for which it was initially agreed,
- All children featured in PAFC publications will be appropriately dressed,
- Where possible, the image will focus on the activity taking place and not a specific child,
- Where appropriate, images represent the broad range of people participating safely in the event,
- Designated Club photographers will, where applicable, undertake a DBS check and attend a Safeguarding Children workshop and in any case will be personally responsible for keeping up to date with the latest guidelines on the Use of Images policies issued by PAFC and other agencies.
- Children who are subject to family, care or legal proceedings, or who are under a court order will not have their images published in any PAFC document. Large crowds at events such as match days must be taken into consideration by parents/carers to the possible unintentional image capture of their child by PAFC photographers.
- No images of children featured in PAFC publications will be accompanied by personal details such as their school or home address,
- Recordings of children for the purposes of legitimate coaching aids are only filmed by PAFC officials and are stored safely and securely at the Club's premises,
- Any instances of inappropriate images in football should be reported to the Clubs Head of Communications, and the Designated Safeguarding Officer immediately,
- PAFC does not put young player profiles with images and personal information on its website without prior written consent from those with parental responsibility of the child or young person.

## 7 Match day

### 7.1 Unaccompanied Children

7.2 In accordance with PAFC's ticketing terms and conditions, the minimum age that a child is permitted to attend a match unaccompanied is 14 years old. Those aged 13 and under must be accompanied by a responsible adult aged 18 or over, home and away.

### 7.3 Lost Children

7.4 If a child becomes separated from a parent/carer during their visit to Home Park, the Designated Safeguarding Officer must be informed immediately via the control room so the right procedures can be followed.

7.5 The member of staff should keep the child or parents/carers in the location they were last together. A detailed description should be noted down and shared between stewards via the control room.

7.6 In the likely event of a mass pitch incursion, the Designated Safeguarding Officer will be positioned in the control room to hear all radio communications and to be able to be deployed and deploy

dedicated safeguarding staff.

#### 7.7 Mascots and Ball Retrieval

7.8 Parental consent must be gained for a child or young person to be a match day mascot or be part of the ball retrieval team. Consent must also be given for an image to be published in the match day programme.

7.9 No personal information will be published alongside imagery of a child.

7.10 Whilst a mascot or member of the ball retrieval team, the children will be accompanied by at least 2 members of the Argyle Community Trust team who will have valid Enhanced DBS checks. All members of staff involved in these match day moments for children will have undertaken safeguarding training.

#### 8 Transport

8.1 The Academy has a Head of Player Care and Head of Recruitment who are responsible for arrangements across the Academy, including registering players and players attending the club on trial. The Head of Player Care and Designated Safeguarding Officer have monthly meetings to report on the Academy's transport and other relevant matters.

8.2 When children are being transported on behalf of PAFC academy they will be accompanied by their age group coach or another appropriate member of staff that holds an Enhanced DBS check.

8.3 The Designated Safeguarding Officer has produced a Transport Policy that should be followed when children are being transported by or on behalf of the club. Only vehicles approved by the policy will be permitted to transport children.

8.4 Children will not be permitted to travel in a member staff's personal vehicle unless in extraordinary circumstances and has been consented to by parents/carers and the Designated Safeguarding Officer.

#### 9 Medical

9.1 There are occasions where medical treatment will be necessary. This includes during training sessions and weekend fixtures. Staff numbers and ratios may mean that, at times, there may not be 2 members of staff present during the giving of treatment.

9.2 All members of the medical department will hold a valid Enhanced DB check and are required to undertake the High Speed Training Safeguarding in Sport online course. As PAFC is fully committed to equal opportunities, both male and female staff work within the medical team.

9.3 Where pre booked medical treatment appointments are made, PAFC welcomes parents and carers to attend.

9.4 In the circumstance that a disclosure is made to a member of the medical team by a child or young person, or they have a concern, they will notify the Designated Safeguarding Officer as soon as practicable.

9.5 There are occasions where the Argyle Community Trust team are running events, this can include first team home matches. The Trust will ensure a level of medical cover and there is at least one Emergency First Aider at all activities. All personal information obtained will be treated in

confidence but handed over to other members of staff if necessary. Specialist medical advice will be sought when working with children and young people with a disability or additional needs.

## 10 Host Families

- 10.1 Prior to a player moving in with a host family, all members of the household over the age of 18 are required to undertake an Enhanced DBS check.
- 10.2 All members of the household over the age of 18 are also required to undertake safeguarding training.
- 10.3 PAFC do not have any accommodation agreements that fall under the regulations of private fostering. However, if this situation occurs, PAFC will ensure that all statutory requirements are met and that there is a link between PAFC and the Local Authority.
- 10.4 Regular announced visits are conducted by the Designated Safeguarding Officer and Head of Academy Player Care, as well as at least one unaccounted visit. An initial visit is also completed upon initial application to access the suitability of the applicants and the property.
- 10.5 The Designated Safeguarding Officer and Head of Academy Player Care hold joint responsibility for host families and remain in constant contact with them.

## 11 Youth Loans, Trials and Work Experience

- 11.1 Parental consent will always be sought if an academy player or young professional under the age of 18 joins another club on a trial basis, work experience or a Football League Youth Loan. This consent is additional to that sought at the start of the season. Consideration will always be given to the players education, travel and accommodation arrangements. If a new club is not located within a reasonable travel distance, PAFC will insist that players are placed with host families and not in hotel accommodation. The Designated Safeguarding Officer will nominate a member of staff to check on the player on a weekly basis, this will include for their general welfare.
- 11.2 Players joining PAFC on a trial who are under the age of 18 will require parental consent before commencement of the trial. Suitable checks will also take place, including medical and host family accommodation. If the players parents/carers are traveling for the trial period also, then a local hotel will be used.
- 11.3 Transportation will be provided to the player and travelling relatives during the trial period.

## 12 U18 and First Team Progression

- 12.1 As players progress through the academy, there will be opportunities to train and play with the first team. This may be a concern for the player and parents/carers as they will be entering an adult environment and may witness adult behaviours and language. The club will support the player/s during this transition via Head of Academy Player Care, Designated Safeguarding Officer, First Team Player Liaison Officer and First Team Coach/Head of Player Development who provides the link between the first team and academy.
- 12.2 Parental consent will be obtained for every activity or travel and will be supported by the same members of staff.

### 13 Guidelines in the event of a concern

#### 13.1 Highlighting a concern

13.2 PAFC will do everything it can to ensure that children and young people are safeguarded from harm, though there will be occasions where a concern is raised over the treatment of a child. "Child abuse" and "neglect" are generic terms for encompassing any ill treatment of children as well as cases where standards of care do not adequately meet the needs of the child's health and development. Children may be abused or suffer neglect through harm inflicted, or through the failure to prevent acts of harm. Abuse can occur in any setting, including the home, community and online. The perpetrator can be known, or not, to the child and can be of the same or opposite sex. There are often misconceptions about the characteristics of a perpetrator, but it is important to remember that abuse of a child can take place in any setting, by any person.

#### 13.3 Recognising types of abuse, neglect and exploitation:

13.4 **Physical abuse** – a deliberate act of causing injury or trauma to another person. For example, pushing, slapping, hitting, kicking, burning, giving unneeded medicine.

13.5 **Emotional abuse** – Any act or other treatment that may cause emotional damage and undermines their sense of wellbeing, this includes persistent criticism, unrealistic expectations, verbal assault, humiliation, blaming, controlling, intimidation and use of threats.

13.6 **Sexual abuse** - The result of exploitation of a child, young person or Adult at Risk, whether they consent or not, for the purpose of sexual or erotic gratification. This includes non-contact activities, such as indecent exposure, exposing to witnessing sexual acts, grooming them in preparation of abuse (including online). The age of consent (the age in which a person is considered legally competent to consent to sexual acts) is sixteen, but it is unacceptable for any member of staff to abuse their position of trust for sexual gratification.

13.7 **Neglect** – This is the ongoing failure to meet the basic needs of a child, young person or Adult at Risk. Examples are not providing adequate food or shelter, failing to protect them from physical or emotional harm and failure to ensure access to necessary medical care and treatment. In an activity setting this could look like failure to provide adequate supervision or exposing them to unnecessary risks.

13.8 **Grooming** – This is the development of a relationship and trust from the child, young person or Adult at Risk to exploit, abuse or traffic them. Grooming can happen in person and online.

13.9 **Child Sexual Exploitation** – This is a form of sexual abuse. This occurs when a group, or individual, takes advantage of an imbalance of power to coerce or manipulate a child or young person into sexual activity in exchange for something that the victim wants/needs. Child sexual exploitation can still occur even if the sexual activity appears consensual. Child sexual exploitation can also happen online.

13.10 **Child Criminal Exploitation** – Children can be forced or manipulated into transporting drugs or money through county lines. They can also be forced to work in cannabis farms, shoplift or pickpocket, vehicle crime, or serious violence. Children can become trapped by this exploitation and experience threats of violence directly or to their family. Children can also be coerced into carrying bladed articles for protection.

13.11 **County Lines** – Organised criminal distribution of drugs from big cities into smaller towns and rural areas using children, young people and Adults and Risk to carry them. These vulnerable

groups are recruited by gangs via deception, intimidation, violence and/or grooming. Gangs can also take over the house of an Adult at Risk as a base.

- 13.12 **Cuckooing** – This term is often linked to county lines. This is when the gang uses a vulnerable individuals home in the target location. People exploited in this way are often subject to further abuse including physical, sexual and emotional. Victims of Cuckooing are often drug users but can include the elderly, female sex workers, single mums and those living in poverty. These victims can often suffer with additional forms of addition such as alcoholism.
- 13.13 **Radicalisation** – When a person comes to support terrorism or forms of extremism, leading to terrorism. Any person, from any background, can be radicalised.
- 13.14 **Female Genital Mutilation (FGM)** – Procedures that intentionally alter or injure female genital organs for non-medical reasons. This procedure has no health benefits for girls or women. The Female Genital Mutilation Act makes it illegal to practice FGM in the UK or to take females who are British nationals/permanent residents of the UK abroad for FGM, whether or not it is lawful in another country.
- 13.15 **Forced Marriage** – Where one, or both parties do not (or cannot) consent to the marriage. In the UK this is recognised as a form of domestic and/or sexual violence against men and women. When this affects children, it is child abuse. Violence does not have to be used to make this illegal.
- 13.16 **Honour based Abuse/Violence** – Honour Based Abuse (HBA) or Honour Based Violence (HBV) are a collective of practices which are used to control behaviour within social groups or families to protect perceived cultural and religious beliefs. This can occur when the perpetrator perceives that a relative has shamed the family or community. Victims are more likely to be abused multiple times by multiple perpetrators. In relation to children, it can be deeply embedded coercive control with expectation of behaviours being made clear from a young age. Honour based abuse can include forced marriage, domestic and sexual abuse, rape, physical assault, kidnap, threats of violence, violence directed towards someone else (such a sibling) and FGM.

The '*One Chance Rule*' – There may only be one opportunity to speak to a victim or potential victim and may have only one chance to save a life. If the victim is allowed to leave without appropriate support, that one chance might be wasted.

- 13.17 **Bullying** – Repeat behaviour of intended intimidation or to upset someone and make them feel uncomfortable or unsafe. This can include name calling, isolation, spreading rumours, embarrassing someone in front of others, threatening or causing harm, damaging someone's possessions.
- 13.18 **Cyberbullying** – Use of technology to harass, threaten, embarrass, humiliate, or target a person. By the definition, it occurs to children and young people. When this occurs to adults, it is cyber harassment or cyberstalking.
- 13.19 **Discriminatory abuse** – This is where abusive or bullying behaviours are motivated by prejudice against certain people or groups of people. This could be because of age, gender, race, nationality, religion, sexual orientation, and other reasons. Actions could include unfair or less favourable treatment, insults including racial slanders. This sort of behaviour will not be tolerated under any circumstances and will be reported to the FA; this also includes off pitch behaviours on social media.
- 13.20 **Poor Practice** – This is where behaviour falls short of abuse but is unacceptable. Poor practice must always be challenged and reported. Failure to report such behaviour could result in an environment where abuse is more likely to go unnoticed. Example of poor practice are ignoring

health and safety guidelines, giving continued preferential treatment to individuals, compromising welfare, allowing concerning practice to go unreported.

- 13.21 **Hazing** – Initiation activities, rituals, actions/situations, with or without consent, that recklessly, intentionally, or unintentionally, endanger the physical or emotional wellbeing of a child, young person or Adult at Risk.
- 13.22 **Child-on-Child Abuse** – Any form of physical, sexual, emotional, financial abuse, or coercive control by a child or young person upon another child or young person.
- 13.23 **Infatuations** – Children, young people and Adults at Risk can develop infatuations with members of staff who work with them. These situations are sensitive and so should be handled in a way that maintains the dignity and safety of all involved. In these situations, words or actions may be misinterpreted and so staff should be hypervigilant. Should a member of staff become aware of an infatuation involving themselves or someone else, this should be reported to the Designated Safeguarding Officer as soon as possible.

## 14 Significant Harm

- 14.1 Some children will need interventions because they are suffering, or likely to suffer, significant harm. The Children Act 1989 introduced the concept of significant harm under Section 47 as the threshold that justifies compulsory intervention in family life where it will be in the best interests of the child or children. It gives local authorities a duty to make decide whether they should take action to safeguard the child who is suffering, or likely to suffer, significant harm.
- 14.2 Any decisions made under a Section 47 must involve a Multi-Agency Strategy Meeting and follow with an Initial Child Protection Conference (ICPC) within 15 days of the Strategy Meeting. The Strategy Meeting will conclude with an outcome as to whether the threshold for significant harm has been met, or not. If there is no pursue of the Section 47 enquiry, consideration must be given to multi-agency interventions to support the needs of the child.
- 14.3 There is no fundamental criteria upon which to rely when judging what constitutes significant harm. The severity of ill-treatment could be made up of the extent of physical harm, frequency of neglect, the extent of premeditation, along with the levels of threat, coercion, and any unusual elements. A single traumatic event could constitute significant harm, as well as a catalogue of long-standing traumatic events.
- 14.4 It is important to consider the child's own assessment of the capacity of potential improvements in the parenting and care of them. Having the child's voice is paramount unless the child is unable to speak due to age or disability/additional needs.

## 15 Reporting

- 15.1 The Designated Safeguarding Officer should be contacted as early as possible to negate any lost time for action to be taken. It is recognised that some situations may require an immediate response and so the reporting may be delayed.
- 15.2 The following guidance is in place to help support a person in reporting abuse or suspected abuse and poor practice:

### DO:

- Always ensure the safety of the child or young person,
- Treat all allegations as serious,
- Give reassurance that the child is not to blame,

- Praise the child for doing the right thing in speaking to you,
- Be honest about who you will have to tell and why,
- The child should understand what you will do and when, a child centred approach will be at the centre of all concerns raised,
- Take action as soon as possible,
- Write everything down that has been said, sign and date also,
- Consider seeking medical advice if necessary

**DO NOT:**

- Promise anything, such as keeping secrets,
- Interrogate – this is for the Police and/or Children's Services,
- Change what they are saying to you,
- Make them feel like they are to blame,
- Inform any parents/carers – this is for the Designated Safeguarding Officer.

15.3 Doing nothing is NOT an option. Safeguarding is EVERYONES responsibility.

## **16 Low Level Concerns**

16.1 Concerns or allegations that do not meet the threshold for harm are referred to as 'low level concerns'.

16.2 PAFC promote a culture where all concerns are reported promptly and dealt with sensitively and effectively. This enables a culture where concerning behaviours are dealt with early and thus minimises the risk of abuse. This will also ensure that all staff are clearly aware of the professional boundaries and support the values of PAFC.

16.3 The report of a low level concern, does not mean that it is insignificant. This means that it could be a doubt that a member of staff is not adhering to the code of conduct or values of PAFC, this include outside of work.

16.4 Low Level concerns can exist on a wide spectrum, this could be from thoughtlessness, behaviour that looks inappropriate, but might not be in certain circumstances, through to actions that could be intended for abuse.

16.5 All staff in regulated activity with children are subject to minimum annual training on low level concerns.

16.6 **Reporting and Retention of Reported Information**

16.7 All low level concerns should be reported to the Designated Safeguarding Officer as soon as possible.

16.8 PAFC ensure that all low level concerns are reported and recorded effectively to stop any potential abuse taking place.

16.9 All reports of low level concerns will be held on the case management system, My Concern. These records are confidential and can only be access by the Designated Safeguarding Officer and the Senior Safeguarding Manager.

16.10 Information held for low level concerns are not held on personal files and are not used on references unless the concern triggered disciplinary action.

## 17 Recording and Investigation

- 17.1 If it has not already been reported via My Concern, the Designated Safeguarding Officer will create a report via My Concern. This will immediately inform the Senior Safeguarding Manager.
- 17.2 Any statements, including those of the child, should be written in their own words. These reports should be confined to facts only. Opinions or judgements should be clearly stated. One questions should be used, in the format of TED (Tell me, Explain, Describe). There should not be any suggestions made about who the perpetrator may be.
- 17.3 A child should only show physical marks if they wish to do so, and this should be in the presence of two members of staff holding a valid Enhanced DBS, location for this should also be considered. The viewing of physical marks should be clearly marked on the body map on the disclosure form and signed by those staff present. There should be no pressure placed upon a child to give information
- 17.4 All matters are confidential on a need-to-know basis and there should never be any reservations about referring a concern to the Designated Safeguarding Officer. PAFC cannot always guarantee confidentiality given to the child.
- 17.5 PAFC will always ensure that any child is removed from any possible risks of harm.
- 17.6 Investigations into such possible abuse must be managed carefully and sensitively. In the first instance, the Designated Safeguarding Officer and Senior Safeguarding Manager will work closely with Children's Services, the Local Authority Designated Officer (LADO), the Police, the FA safeguarding team, before conducting an internal inquiry and take advise on informing parents.
- 17.7 Any investigation PAFC undertake will follow the key principles as follows:
  - Integrity – PAFC will always be honest with all parties involved regarding the process, what we can, and can't do,
  - Fairness and impartiality – Complainants and witnesses will be spoken to, as well as the individual in which the concern relates to. This will allow for a balanced and unbiased account of events,
  - Confidentiality – PAFC will only share information with parties necessary for safeguarding reasons (Police, Local Authority, children's services etc).
  - Proportionality – decisions are made on a case-by-case basis,
  - Timeliness – the process will never be rushed by PAFC recognise the disruption inquiries can cause.

## 18 Allegations against members of staff

- 18.1 This will include full-time, part-time, unpaid, contracted and voluntary.
- 18.2 If the report involves a member of staff and the club believes that the staff member has either behaved in a way that has harmed, or may have harmed a child, possibly committed a criminal offence against or related to the child, or behaved towards a child, or children, in a way that indicates being unsuitable to work with children, then the Designated Safeguarding Officer shall inform the Local Authority Designated Officer (LADO) so that they can contact the police and Children's Services as appropriate. Where the Designated Safeguarding Office may be unsure whether the criteria has been met, the advice of the LADO will be sought.
- 18.3 The staff member in question will be asked to write a statement, as will any other persons deemed to have an involvement. The staff member will be asked to stay away from all activities involving

the other party whilst the investigation is ongoing. Providing it does not contradict the advice of the LADO, an internal investigation will be carried out in line with HR policies and any grievance procedures.

## **19 Social Media and Online Safety**

- 19.1 Children and young people use electronic devices every day to go online, connect with others, and share photos, videos, and messages through social media platforms such as Facebook, Instagram, Snapchat and X (formally Twitter).
- 19.2 Unfortunately, some adults and young people may misuse these technologies to cause harm. This could include sending hurtful or abusive messages or attempting to groom and manipulate children into unsafe conversations, sharing inappropriate images, or arranging to meet in person.
- 19.3 Children can also be exposed to harmful material online, such as sites that promote unhealthy lifestyles, extremist views, or criminal behaviour.
- 19.4 Clear professional boundaries for staff, players, parents, carers and young people to ensure everyone stays safe online are set out in the clubs Social Media Policy.

## **19.5 Cyberbullying and Sexting**

- 19.6 Any form of cyberbullying or sexting involving children in connection with the club will be treated with the same seriousness as any other type of bullying and will follow the clubs anti-bullying policy.
- 19.7 Serious concerns, including sexing and peer-on-peer abuse, will be managed in line with national safeguarding guidance, including the UK Council for Internet Safety (UKCIS) framework on responding to such incidents (2017).
- 19.8 Many children now own or have access to mobile devices. PAFC encourage parents and carers to talk regularly with their children about staying safe online and to take part in national campaigns such as Safer Internet Day.
- 19.9 As a general rule, children must not take photographs or videos during club activities, particularly in private areas such as changing rooms, showers, or bedrooms, or when other children may be in a state of undress.

## **19.10 Child Exploitation and Online Protection (CEOP)**

- 19.11 CEOP, part of the National Crime Agency, works to protect children and young people, parents, carers and professionals. Anyone can make a report directly to CEOP if they are concerned about online exploitation or grooming.
- 19.12 The club encourages the use of CEOP's education resources, available at:  
[www.ceopeducation.co.uk](http://www.ceopeducation.co.uk)
- 19.13 If a child or young person is being pressured or tricked into sexual activity of any kind – either in person or online – CEOP can offer support and guidance. Reports can be made through CEOP - [CEOP Safety Centre](#)
- 19.14 If you are worried about online bullying or something that has happened online, you can speak to a member of the clubs safeguarding team, a trusted adult, or contact Childline on 0800 1111 or visit [www.childline.org.uk](http://www.childline.org.uk)

### 19.15 Staff

19.16 All communication by staff using ICT (Information and Communication Technology) must be through club systems, where practical – such as club email addresses. This ensures safeguarding policies, firewalls and filters remain in place.

19.17 It is vital that staff maintain clear professional and personal boundaries at all times, both online and offline:

- Staff must not have private online or electronic communication with children involved in club activities unless formally approved.
- Friend or follow requests from children, parents or carers on social media must be politely declined.
- Any concerns arising from social media contact should be reported to the Designated Safeguarding Officer immediately.
- Staff should take care with how they present themselves online, ensuring their conduct and content are appropriate and reflect the values of the club.
- Any safeguarding related questions or clarifications should be directed to the Designated Safeguarding Officer.

19.18 As a general rule, communication with children under 16 should take place through the club and their parent or carer. In exceptional circumstances, where direct communication is necessary for welfare or professional reasons, this must first be discussed and approved by the Designated Safeguarding Officer, and consent obtained from the child's parent or carer.

### 19.19 Filtering and Online Protection

19.20 Plymouth Argyle operates a robust internet filtering system to block harmful or inappropriate online content. This includes material linked to:

- Discrimination
- Drugs or substance misuse
- Extremism
- Malware or hacking
- Pornography
- Piracy and copyright infringement
- Self-harm
- Violence and gambling

19.21 The filtering system covers all club sites, including the Academy and any Wi-Fi networks used by players, staff and visitors. While public access to club Wi-Fi is restricted, users within the network receive the same level of online protection.

## 20 Organisational Safeguarding Flowchart

20.1 Safeguarding across PAFC is given the highest priority. PAFC have a full time Designated Safeguarding Officer to promote best practice and create a safer culture across all aspects of the club.

At PAFC operational board level, the Senior Safeguarding Manager endorses all safeguarding policies on behalf of the board. Safeguarding is a standing agenda item at board meetings and the Designated Safeguarding Officer reports regularly.

PAFC have safeguarding representatives across all aspects of the business to ensure the highest standards are maintained.

There are additional safeguarding policies and procedures, which give greater detail and support this central document.



20.2 The Argyle Community Trust have their own Designated Safeguarding Officer and safeguarding management structure. The DSO's meet monthly to share information and promote best practice.

20.3 PAFC have a dedicated Disability Liaison Officer (DLO) who is the first point of contact for those with additional considerations when attending matchdays or other PAFC events. It is recognised that the safeguarding team have support within their role, and so the Designated Safeguarding Officer has supervision by the way of regular meetings with the Senior Safeguarding Manager.

## 21 Useful contacts

21.1 If a child, young person or adult at risk is at immediate risk of harm, call **999**.

NAME	EMAIL	PHONE
Rhiannon Foote - DSO	<a href="mailto:safeguarding@pafc.co.uk">safeguarding@pafc.co.uk</a>	07933 751103
Paul Berne - SSM	<a href="mailto:Paul.berne@pafc.co.uk">Paul.berne@pafc.co.uk</a>	01752 562561
Mackenzie Brown - Academy Head of Player Care	<a href="mailto:Mackenzie.brown@pafc.co.uk">Mackenzie.brown@pafc.co.uk</a>	01752 562561
Zac Newton - HR	<a href="mailto:Zac.newton@pafc.co.uk">Zac.newton@pafc.co.uk</a>	01752 562561
Emily Rowland - Disability Liaison Officer	<a href="mailto:Emily.rowland@pafc.co.uk">Emily.rowland@pafc.co.uk</a>	01752 562561
Michelle Ottley - ACT DSO	<a href="mailto:Michelle.ottley@pafc.co.uk">Michelle.ottley@pafc.co.uk</a>	01752 562561
EFL	<a href="mailto:safeguarding@efl.com">safeguarding@efl.com</a>	
The FA	<a href="mailto:safeguarding@thefa.com">safeguarding@thefa.com</a>	
Police	<a href="mailto:101@devonandcornwall.pnn.police.uk">101@devonandcornwall.pnn.police.uk</a>	999 / 101
Prevent	<a href="mailto:prevent@devonandcornwall.pnn.police.uk">prevent@devonandcornwall.pnn.police.uk</a>	01392 225130
Police Anti-Terrorist Hot Line		0800 789 321
PSCP (Out of hours)	<a href="mailto:gateway@plymouth.gov.uk">gateway@plymouth.gov.uk</a>	01752 668000 01752 346984
LADO	<a href="mailto:lado@plymouth.gov.uk">lado@plymouth.gov.uk</a>	01752 668000
Childline	Via 'locker' on <a href="http://www.childline.org.uk">www.childline.org.uk</a>	0800 1111
NSPCC	<a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>	0808 800 5000

## 22 Useful external links and contacts

22.1 Keeping Children Safe in Education (KCSiE 2025):

[Keeping children safe in education 2025](https://www.gov.uk/government/publications/keeping-children-safe-in-education-2025)

22.2 Working Together to Safeguard Children 2023:

[Working together to safeguard children 2023: statutory guidance](https://www.gov.uk/government/publications/working-together-to-safeguard-children-2023-statutory-guidance)

22.3 FA Safeguarding Children Guidelines:

[The FA Policy Downloads](https://www.football.org.uk/policy-downloads)

22.4 EFL Safeguarding policies:

[Safeguarding - The English Football League \(efl.com\)](https://www.englishfootballleague.com/safeguarding)

22.5 Prevent:

[Prevent duty guidance: England and Wales \(2023\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/prevent-duty-guidance-england-and-wales-2023)

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