



**CHILD PROTECTION AND SAFEGUARDING OF  
VULNERABLE PERSONS POLICY**

**2025**



Goals firmly believe that every employee, customer and visitors within their premises has the right to expect a safe and healthy environment that is free from risk of injury or ill health, as outlined in the overriding health and safety policy document 2024.

Protection of children and vulnerable persons while visiting or participating in use of the clubs facilities is of paramount importance to Goals Soccer Clubs.

Goals and the management team acknowledge their responsibilities and “ Statutory duty of care” to safeguard from harm all children and vulnerable persons involved in activities within their clubs.

All children and vulnerable persons have a right to protection with any specific additional needs being taken into account.

### **Children**

Goals will ensure the safety and protection of all children involved in activities through adherence to the Child Protection guidelines adopted by Goals. A child is defined as a person under the age of 18 (The Children Act 1989).

The **Children Act 2004** states that the interests of **children** and young people are paramount in all considerations of welfare and safeguarding and that safeguarding **children** is everyone’s responsibility.

### **Vulnerable Persons**

Goals will ensure the safety and protection of vulnerable persons involved in activities through adherence to the Safeguarding **Vulnerable** Groups **Act** (SVGA) 2006 was passed to help avoid harm, or risk of harm, by preventing people who are deemed unsuitable to work with children and **vulnerable** adults from gaining access to them through their work.

#### **Definition of vulnerable person: -**

*The Department of Health defines a **vulnerable** adult as a **person** aged 18 years or over who is or may be in need of community care services by reason of mental or other disability, age or illness, and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm.*

“Goals and the Management Team are committed to upholding these principals” including the liaison with Local Authority Designated Officer “**LADO**” (or Designated Officer)

*The Designated Officer “**LADO**” is responsible for managing allegations against adults who work with children. This involves working with police, children's social care, employers and other involved professionals. The LADO does not conduct investigations directly, but rather oversees and directs them to ensure thoroughness, timeliness and fairness. Ordinarily, to ensure impartiality, the “**LADO**” will not have direct contact with the adult against who the allegation has been made, or the family of the child/children involved but will, as part of their role ensure that these have information regarding outcomes.*

**For the purpose of this policy Goals will be referred to as the company or organisation.**



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## 1. Policy Aims

The aim of Goals Child Protection and Safeguarding of Vulnerable Persons Policy is to promote good practice:

- Providing children, young people and vulnerable persons with appropriate safety and protection whilst in the care of Goals;
- Allow all Employees and coaches/referees to make informed and confident responses to specific child protection and vulnerable persons issues.

### Promoting Good Practice

Abuse, particularly sexual abuse, can arouse strong emotions in those facing such a situation. It is important to understand these feelings and not allow them to interfere with your judgement about the appropriate action to take.

Abuse can occur within the sporting environment. Some individuals will actively seek employment or voluntary work with young people in order to harm them. An employee, coach, instructor, teacher, official or volunteer will have regular contact with young people and be an important link in identifying cases where they need protection. All suspicious cases of poor practice should be reported following the guidelines in this document.

### Good Practice Guidelines

All Goals employees are encouraged to demonstrate exemplary behaviour in order to promote health, safety, welfare and reduce the likelihood of allegations being made.

**The following are common sense examples of how to create a positive culture and climate:**

Good practice means:

- Always working in an open environment (e.g. avoiding private or unobserved areas).
- Treating all children and vulnerable persons equally, with respect and dignity.
- Always putting the welfare of each young and vulnerable person first.
- Maintaining a safe and appropriate distance with children and vulnerable persons, (e.g. it is not appropriate for staff or volunteers to have an intimate relationship with a child).
- Promotion of playing sports fun, enjoyable and promoting fair play.
- Ensuring that if any form of manual/physical support is required, it should be provided openly and according to guidelines provided by, for example, the FA Coach Education Programme. Care is needed as it is difficult to maintain hand positions when the child or vulnerable person is constantly moving. Young and vulnerable people and their parents / guardians should always be consulted and their agreement gained.
- Keeping up to date with technical skills, qualifications and insurance in sport.
- Involving parents wherever possible. For example, encouraging them to take responsibility for their children in the changing rooms. If groups have to be supervised in the changing rooms, always ensure staff, parents, teachers, coaches or officials work in pairs.
- Being an excellent role model – this includes not smoking or drinking alcohol in the company of young people.
- Giving enthusiastic and constructive feedback rather than negative criticism.

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- Recognising the developmental needs and capacity of children and vulnerable persons – avoiding excessive training or competition and not pushing them against their wishes.
- Keeping a written record of any injury that occurs, along with the details of any treatment given.

## 2. Practices To Be Avoided

The following should be avoided except in emergencies. If cases arise where these situations are unavoidable it should be with the full knowledge and consent of the Club Manager and/or the child's / vulnerable persons parents or guardians.

**“For example a child sustains an injury and needs to go to hospital” or “a parent fails to arrive to pick a child up at the end of a session”:**

- Avoid spending time alone with children / vulnerable person away from others
- Avoid taking or dropping off a child / vulnerable person to an event or activity

### Practices Never To Be Sanctioned

The following should never be sanctioned. You should never:

- Engage in rough, physical or sexually provocative games, including horseplay
- Allow or engage in any form of inappropriate touching
- Allow children and vulnerable persons to use inappropriate language unchallenged
- Make sexually suggestive comments to a child or vulnerable persons, even in fun
- Reduce a child or vulnerable persons to tears as a form of control
- Fail to act upon and record any allegations made by a child or vulnerable persons
- Do things of a personal nature for children or vulnerable persons that they can do for themselves
- Invite or allow children or vulnerable persons to stay with you at your home unsupervised.

## 3. Reportable Incidents

The following occurrences / incidents **MUST** be reported immediately to the Club Manager and “Welfare Officer” (who is required to report the incident to the Regional Manager) and record the incident. You should also ensure the parents of the child are informed:

- If you accidentally hurt a child or vulnerable person.
- If he/she seems distressed in any manner.
- If a young or vulnerable person appears to be sexually aroused by your actions.
- If a young or vulnerable person misunderstands or misinterprets something you have said or done.
- Any allegations of inappropriate conduct of third party providers including self-employed coaches / referees.

Incidents are required to be reported by the **General Manager or Welfare Officer** via PRIME under safeguarding, the report will be reviewed centrally at head office and reported to the “LADO” at the relevant Local Authority.



#### **4. Recruitment and Training of Employees and Volunteers.**

Goals recognise that anyone may have the potential to abuse children or vulnerable persons in some way and that all reasonable steps are taken to ensure unsuitable people are prevented from working with children as follows:

- Pre selection checks must include the following:
- All employees who will be working with children should complete an application form.
- The application form will elicit information about an applicant's past and a self-disclosure about any criminal record.
- Consent should be obtained from an applicant to seek information from the Criminal Records Bureau.
- Two confidential references, including one regarding previous work with children or vulnerable persons.
- References must be taken up and confirmed through telephone contact.
- Evidence of identity (passport or driving licence with photo).

##### **Interview and Induction**

All employees (and volunteers) who will be working with children and vulnerable persons will be required to undergo an interview carried out to acceptable protocol and recommendations.

All employees and volunteers will receive an induction, during which:

- A check should be made that the application form has been completed in full (including sections on criminal records and self-disclosures).
- Their qualifications should be substantiated.
- The job requirements and responsibilities should be clarified.
- Child protection and safeguarding of vulnerable persons procedures are explained and training needs identified.
- They shall sign up to Goals Child Protection and Safeguarding of Vulnerable Persons Policy.

##### **Training**

In addition to preselection checks, the safeguarding process includes training after recruitment to help relevant employees and volunteers to:

- Analyse their own practice against established good practice, and to ensure their practice is not likely to result in allegations being made.
- Recognise their responsibilities and report any concerns about suspected poor practice or possible abuse.
- Respond to concerns expressed by a child, young and vulnerable persons.
- Work safely effectively with children and vulnerable persons.

##### **Goals requires:**

- Relevant personnel to receive advisory information outlining good practice and informing them about what to do if they have concerns about the behaviour of an adult towards a young and vulnerable person.



- Relevant personnel to gain a national first aid training (where necessary). Attend update training when necessary.
- Information about meeting training needs can be obtained from the FA, Sports Coach UK, the NSPCC, and the Sport Council.

## **5. Responding To Allegations Or Suspicions**

It is not the responsibility of anyone working at Goals, in a paid or unpaid capacity to decide whether or not child or vulnerable person abuse has taken place. However there is a responsibility to act on any concerns by reporting these to the Club Manager.

Goals will assure all employees / volunteers that it will fully support and protect anyone, who in good faith reports his or her concern that a colleague is, or may be, abusing a child or vulnerable person. Where there is a complaint against a member of staff there may be three types of investigation:

- A criminal investigation,
- A child protection investigation,
- A disciplinary or misconduct investigation.

The results of the police and child protection investigation may well influence and inform the disciplinary investigation, but all available information will be used to reach a decision.

Goals supports The FA's whistle blowing policy. Any employee with concerns about a colleague or volunteer can 'whistle blow' by contacting

The FA Child Protection Manager on 0207 745 4771, or by writing to:

**The FA Case Manager at  
The Football Association,  
25 Soho Square,  
London  
W1D 4FA**

or by going direct to the police, social services or the NSPCC. Goals encourage everyone to know about this facility and to utilise it if necessary.

## **6. Internal Enquiries and Suspension**

It is the responsibility of the Regional Manager who will make an immediate decision about whether any individual, accused of abuse should be temporarily suspended pending further police and social services inquiries.

Irrespective of the findings of the social services or police inquiries the Regional Manager will assess all individual cases to decide whether an employee or other person working within the club can be reinstated and how this can be sensitively handled.

This may be a difficult decision; particularly where there is insufficient evidence to uphold any action by the police.

In such cases, the Regional Manager in association with a Company Operations Director must reach a decision based upon the available information, which could suggest that on a balance



of probability, it is more likely than not that the allegation is true. The welfare of the child or vulnerable person should remain of paramount importance throughout and take priority.

## **7. Allegations of Previous Abuse**

Allegations of abuse may be made some time after the event (e.g. by an adult who was abused as a child or by a member of staff who is still currently working with children).

Where such an allegation is made, the Company shall follow the procedures as detailed above and report the matter to the social services or the police.

This is because other children and vulnerable persons, either within or outside sport, may be at risk from this person.

Anyone who has a previous criminal conviction for offences related to abuse is automatically excluded from working with children. This is reinforced by the details of the Protection of Children Act 1999 and Safeguarding Vulnerable Groups Act (SVGA) 2006.

## **8. Bullying**

Bullying by children or adults on children within Goals and affiliated academies must never be tolerated. All forms of bullying are taken seriously by Goals and will be responded to appropriately in accordance with the following minimum standards.

Bullying is behaviour, usually repeated over time, that intentionally hurts another individual or group; physically or emotionally.

There is often a power imbalance that makes it hard for the victim/s to prevent or deal with the perpetrator's actions.

The damage inflicted by bullying can frequently be underestimated. It can cause considerable distress to young people, to the extent that it affects their health and development or, at the extreme, causes them significant harm (including self-harm).

### **Bullying can occur between:**

- An adult and young or vulnerable person.
- A young person and young or vulnerable person.
- A parent and their child or vulnerable person.

Bullying may take many forms and may be conducted in person or through the actions of another person/other people. These include:

- Emotional: for example, being unfriendly, excluding, tormenting (e.g. hiding belongings, threatening gestures), name-calling, sarcasm, spreading rumours, teasing/taunts, graffiti.
- Physical: for example, pushing, kicking, hitting, punching or any use of violence.
- Sexual: for example, unwanted physical contact or sexually offensive comment/s.
- Cyber: for example, email & internet chat room misuse, mobile phone threats by text messaging & calls, misuse of technology (camera & video footage).

Bullying may also take the form of singling out individuals because they belong to a group or are different in some way from others (prejudice-based bullying) and may include:

- Racist and religious based bullying





- Homophobic/ bi-phobic/ trans-phobic: because of their sexual orientation, or perceived, or actual gender identity
- Disablist: May focus on, or exploits, a particular aspect of the individual's disability.
- It is acknowledged that the competitive nature of sport can result in tensions that may lead to bullying but bullying cannot be condoned in any circumstance.

#### **Examples of bullying could be:**

- A participant who intimidates fellow participants inappropriately;
- A coach who adopts a win-at-all costs philosophy;
- A parent who pushes too hard;
- An official who places unfair pressure on a person.

#### **Strategies to Discourage Bullying**

- Create an open environment and provide adequate supervision at all times;
- Encourage children and vulnerable persons to speak out and share any concerns with the person in charge, the General Manager or other responsible adults;
- Take all signs or allegations of possible bullying seriously.
- Responding to victims of bullying immediately.
- Anyone becoming aware that a child or vulnerable person is being bullied should offer them reassurance and try to gain the child's or vulnerable persons trust;
- Explain that someone in authority may need to be informed;
- Keep accurate records of what happened together with names of those involved and any action taken;
- Report suspicions or concerns to the General Manager

#### **Confronting the bully/bullies (child on child or vulnerable person)**

- Talk to the bully, or bullies; explain the situation and try to get the bully/bullies to understand the consequences of their actions;
- Seek an apology from the bully/bullies to the victim;
- Inform the bully/bullies parents;
- Impose sanctions or disciplinary action if necessary;
- Report and record all actions taken;
- Provide support for the victim and his/her parents / guardians
- Encourage the bully/bullies to change his/her behaviour.

#### **Supporting the Bullied**

Children and vulnerable persons who have been bullied will often need support from coaches / employees to deal with the impact of bullying. This may include having a specific person to whom concerns can be raised in specific situation or providing a named senior member as a "buddy"

They may need support external to the club from parents, guardians other relatives.

Goals club management can advise the child or parent to contact Kidscape, a charity that offers support to bullied children as well as day courses to help them deal with bullying and its after effects including how to avoid being bullied in future.

[info@kidscape.org.uk](mailto:info@kidscape.org.uk)

**Kidscape, 8-10 South Street, Epsom, Surrey KT18 7PF**



## 9. Photography and Use of Imagery

Photography and use of imagery general principles concerning the use of photographs and/or recorded images implicit within the Goals policies and procedures for the protection of children and vulnerable persons is the commitment to ensure that all publications and media represent participants appropriately and with due respect.

It is not the intention of Goals to prevent parents from taking pictures of their children, relatives or friends but rather to ensure that photographic practices are carefully managed and effective prevention measures are in place to deter anyone with undesirable intentions from taking and publishing inappropriate images.

If Employees and coaches/referees are taking photographs or videos within the sporting environment, whether it be at an event or in a training session, they must comply with the following guidelines:

- Employees and coaches/referees are permitted to use their mobile phones to take photographs or images **providing they have written permission** to take the footage from the parent or guardian.
- These images and videos can be shared on social media sites **with written permission** from a parent or guardian, however once the image or footage has been used for this purpose, **it must** be permanently deleted from the device in all folders, including recently deleted folders and any items stored in the cloud. These images **are not to be shared** via any messaging service with any other member of the team, or any other person unrelated to Goals Soccer Clubs, and must not be used on the employee or coaches own personal, social media sites;
- A photograph, video clip or other image of a participants should not be published whether in print or electronically (e.g. on a website) without written, informed consent from the participant concerned (or in the case of a child or vulnerable person from their parent or guardian);
- No personal information should accompany published images (particular provisions apply in connection to photography at public events such as competitions and displays below);
- While some editing of images is acceptable, images taken of participants should not be modified, merged or manipulated in a way which might cause embarrassment or distress to the subject or cause the final image to be inappropriate;
- Care must be taken to ensure that images of children who are under a court order are not recorded or published without permission;
- Simultaneous “live” streaming of images onto a website should be approached with caution and prior guidance should be sought from the governing body for the activities being undertaken: -FA. Goals requires confirmation from sports specific governing bodies regarding requirements for pre-recording and, where appropriate, editing material to remove any inappropriate images before it is published;
- Any instance of the use or publication of inappropriate images of participants should be reported to Goals will report to the sporting governing bodies who may then inform the appropriate authorities;
- Do not use any personal details if it is possible from the image to ascertain a specific location, or there are any details on your site about the venue;

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- The attire of a child or vulnerable should be considered when using the photo: - i.e. If it is a posed shot for example taken during a medal presentation, try to ensure that the child is fully clothed in a tracksuit or similar attire, If it is an action shot, try to use profile imagery and avoid full-length shots. Alternatively, use digital software to blur the child's facial features;
- Always use a parental consent form to request the use of a child or vulnerable image for publication. The parent should be encouraged to discuss the matter with their child before signing a consent form.

Goals should be informed of any inappropriate use of imagery on websites or any other form of media, which is not in keeping with this guidance. Anyone discovering a child or vulnerable persons image that appears to be being used illegally online should report the matter to the club's General Manager.

## 10. Missing Children and Vulnerable Persons

The missing children and vulnerable persons policy has been written to give a systematic procedure for all employees of Goals Soccer Clubs. It is reasonable to expect panic to occur in the event a child or vulnerable person goes missing, the aim of this policy is to provide a structure to handling this unlikely but possible situation.

### **If in the unlikely event a child goes missing, the following actions should be taken:**

- Ensure that the other children or vulnerable persons in the group are looked after appropriately while a search is conducted.
- Inform the child or vulnerable persons parents, or nominate an appropriate person to call and advise them of your concerns. Reassure them that everything is being done to locate the child or vulnerable person.
- Organise all the available employees and responsible adults by areas to be searched.
- Search the area in which the child or vulnerable person has gone missing including changing rooms, toilets, pitches, car park, public and private areas.
- Request that all those searching report back to the designated responsible person at a specific point.
- Make a note of the circumstances in which the child or vulnerable person has gone missing and where he/she was last seen.
- Prepare a detailed physical description of the child or vulnerable person including, approximate height, build, hair colour, eye colour and clothing being worn.
- If the search is unsuccessful, report the concern to the police. *This must happen no later than 30 minutes after the person's disappearance is noted even if the search is incomplete.*
- Follow police guidance if further action is recommended and maintain close contact with the police.
- Ensure you inform everyone involved if the child or vulnerable person is located at any point.
- Refer the concern as soon as possible to the Safeguarding Manager responsible.
- Complete an incident report to include all witness statements.



## 11. Disclosure Barring Service (DBS) Checks

Intrinsic to Goals policy on Child Protection and Safeguarding of Vulnerable Persons Policy some employees will be required to obtain an Enhanced Disclosure from The Disclosure Barring Service.

Goals policy is that all General Managers, Assistant Managers and Shift Supervisors are required to undertake the Disclosure Barring Service (DBS) process (Enhanced Disclosure).

Coaches who are self-employed **Must** have these checks in place prior to any coach providing their services to the organisation The Club will hold a copy of all checks where GDPR is not affected.

In addition, any club located on School premises **Must** ensure **All** employees that work on site undertake a DBS check (**Enhanced Disclosure**).

All checks **MUST** be assessed annually with a personal disclosure declaration form. The Human Resources department within the company supports the Operations Team to ensure 100% compliance.

The company we use to process the DBS's is GM Group.

The website is <https://www.onlinedisclosures.co.uk/>

### Annual Personal Disclosure Declaration

Goals requires that all persons who have undertaken a criminal records check (enhanced disclosure) to complete an annual declaration, confirming if any personal circumstances have occurred that would affect or invalidate their existing disclosure. The declaration is to be recorded on the DBS declaration.

**NB: Should any persons circumstances change that would affect the validity of the enhanced disclosure this must be recorded and advised to the Regional Manager, failure to comply may result in disciplinary action and possible termination of employment.**

It is the club's General Managers responsibility to ensure all persons required to complete the annual declaration do so and record all completed declarations on the standard document (DBS annual declaration summary sheet)



## **12. Third Party Service Providers – (Business Partners)**

Goals actively participate in local agreements with third party service provider; for the purpose of this policy they are referred to as business partners.

A Business Partner is a provider who provide specialist skills in football provision, actively supporting, coaching and enhancing the football skills of young players (under 16's)

Goals require that all Business Partners adhere to the requirements for child welfare and safeguarding as identified in **Disclosure Barring Service (DBS) process (Enhanced Disclosure)**. In addition Business Partners are required to adhere to all specific requirements imposed by the Football Association.

All records must be maintained and provided to Goals Clubs General Managers on request.

## **13. Adult / Child Changeover Pitch Interaction**

Where interaction is unavoidable between adults and children within Goals Clubs, the management and their teams at will strive ***“So far as Reasonably Practicably”*** prevent harassment, intimidation and bullying by any person or persons.

Goals do not condone any such behaviour by any persons and will take appropriate action should this occur.

Goals strongly believe in a culture of respect to all participants by all participants and have established a ***“Respect Policy”*** to be adhered to by all employees, participants, business partners and service providers.

Where practical Goals management and team members will supervise the changeover of pitches when involving children and adults to supervise an orderly respectful transition off and onto the pitches.

## **14. Review**

The Child Protection and Safeguarding of Vulnerable Persons Policy shall be reviewed and updated at least annually and, in response to legislative developments and changes in operations (for example organisational responsibilities or arrangements, new hazards brought to light) by Senior Management, General Managers and Employees.

Date Policy Issued:

January 2025

**Next review to be undertaken on or before 1<sup>st</sup> January 2026**