

# Safeguarding Children and Adults at Risk Policy

|                     |                                          |                       |                   |
|---------------------|------------------------------------------|-----------------------|-------------------|
| <b>Organisation</b> | Next Generation Pro Football Academy Ltd | <b>Trading name</b>   | NGPFA             |
| <b>Version</b>      | 1.0                                      | <b>Effective date</b> | 21 July 2026      |
| <b>Policy owner</b> | Board of Directors / Academy Director    | <b>Next review</b>    | 21 July 2027      |
| <b>Status</b>       | Public                                   | <b>Contact</b>        | academy@ngpfa.com |

## Safeguarding commitment

NGPFA is committed to creating environments in which children, young people and adults at risk are respected, listened to and protected. The welfare of a child is paramount. Safeguarding is everyone's responsibility.

## 1. Purpose

This policy sets the minimum safeguarding standards for all NGPFA activities. It explains how concerns are prevented, recognised, recorded, reported and escalated, and how NGPFA works with partner schools and colleges, football authorities and statutory agencies.

It is a public policy supported by more detailed operational procedures, risk assessments, codes of conduct, partner protocols, consent forms and reporting systems.

## 2. Scope

This policy applies to:

- all NGPFA directors, employees, coaches, tutors, contractors, consultants, volunteers, work-placement personnel and anyone representing NGPFA;
- all participants, including children aged 8 to 17, young adults aged 18 to 21, and adults at risk with whom NGPFA occasionally works;
- state-sector programmes for ages 16 to 19 and independent-sector programmes for ages 8 to 21;
- football, education, social-development, mentoring, online, media, recruitment, trial, pathway and performance activity;
- one-to-one work, changing rooms, transport, residential activity, hotels, tours, overseas camps, host arrangements, medical support, filming, direct messaging and events attended by scouts or agents; and
- delivery with partner schools, colleges, clubs, venues and international organisations.

## 3. Definitions

### 3.1 Child

A child is anyone who has not yet reached their 18th birthday. The fact that a person is living independently, in employment, in further education or appears mature does not change this definition.

### 3.2 Adult at risk

An adult at risk is a person aged 18 or over who has needs for care and support, is experiencing or is at risk of abuse or neglect, and because of those needs is unable to protect themselves from the abuse, neglect or risk of it. The relevant local authority applies the statutory test.

### 3.3 Safeguarding

Safeguarding means preventing harm, promoting welfare, creating safe practice and responding effectively when a concern arises. Child protection and adult safeguarding are parts of the wider safeguarding responsibility.

## 4. Principles

- The welfare and best interests of children are paramount.
- Every person has a right to participate without abuse, neglect, exploitation, bullying, discrimination or avoidable harm.
- Children and adults at risk will be listened to and taken seriously.
- Safeguarding action will be timely, proportionate and centred on the person, while recognising that consent is not always required to protect a child or prevent serious harm.
- Information will be shared on a need-to-know basis when lawful and necessary; confidentiality must never be promised where safety may be at risk.
- NGPFA will work openly with parents and guardians unless doing so may increase risk, prejudice an investigation or conflict with statutory advice.
- Concerns will be reported; staff must not investigate, confront an alleged perpetrator or decide that a concern is too small to record.
- Equality, inclusion and respect are essential to safeguarding. Additional vulnerability may arise from disability, communication needs, discrimination, isolation, elite-performance pressure, travel or dependency on adults for opportunities.

## 5. Legal and guidance framework

This policy is informed by current law and guidance, including:

- Children Act 1989 and Children Act 2004;
- Working Together to Safeguard Children 2026;
- Keeping Children Safe in Education 2025 and, from 1 September 2026, Keeping Children Safe in Education 2026, as applicable to partner schools and colleges;
- Care Act 2014 and Care and Support Statutory Guidance;
- Safeguarding Vulnerable Groups Act 2006, Protection of Freedoms Act 2012 and current DBS guidance;
- Sexual Offences Act 2003, Equality Act 2010, Human Rights Act 1998, Modern Slavery Act 2015 and Counter-Terrorism and Security Act 2015 where applicable;
- Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025;
- The Football Association safeguarding policies, reporting procedures and codes of conduct; and
- Surrey County FA safeguarding requirements and the procedures of the relevant local authority and partner institution.

## 6. Safeguarding governance and responsibilities

### 6.1 Board of Directors

The Board is accountable for safeguarding governance, resources, safer recruitment, training, oversight, partnerships and review. It will ensure safeguarding is considered in strategic decisions and that serious matters are escalated appropriately.

### 6.2 NGPFA Designated Safeguarding Lead

The Academy Director is the NGPFA Designated Safeguarding Lead (DSL). The current postholder is identified internally and to relevant partner or statutory agencies. Public contact details are role-based:

#### NGPFA Designated Safeguarding Lead - Academy Director

Email: [academy@ngpfa.com](mailto:academy@ngpfa.com)

Telephone: +44 7375 357123

The NGPFA DSL will receive and record concerns, take immediate protective action, consult and refer to partners or agencies, oversee allegations and low-level concerns, support staff, maintain oversight of NGPFA records, liaise with Surrey County FA and The FA, and report themes and assurance to the Board.

### 6.3 Partner schools and colleges

Each partner institution retains responsibility for its own pupils, learners, premises, employees, safeguarding system and statutory duties. During institution-based delivery, concerns must be reported immediately to the institution's DSL through its approved system and also to the NGPFA DSL where NGPFA personnel or delivery are involved.

A partnership agreement must identify the lead contacts, reporting route, record owner, allegation procedure, emergency arrangements and how information will be shared. NGPFA will not assume that a partner's policy removes NGPFA's own responsibilities.

### 6.4 All staff and representatives

Every person covered by this policy must complete required training, follow the code of conduct, remain alert to changes in behaviour or welfare, report concerns immediately, preserve evidence, cooperate with referrals and challenge unsafe practice.

## 7. Recognising abuse and safeguarding concerns

A concern may arise from a disclosure, observation, injury, behaviour, online activity, pattern of absence, poor practice, information from another person or a change that does not have an obvious explanation. Abuse can occur inside or outside the family, institution, football environment or online, and can be committed by adults or peers.

- **Physical abuse:** assault, excessive or inappropriate training, harmful restraint, unsafe punishment, fabricated illness or deliberate injury.
- **Emotional abuse:** humiliation, threats, rejection, coercive control, persistent criticism, unrealistic pressure, intimidation or preventing normal social development.
- **Sexual abuse:** contact or non-contact sexual activity, grooming, sexualised communication, image-based abuse, exploitation or abuse of power and trust.
- **Neglect:** failing to provide supervision, medical care, safe accommodation, nutrition, equipment, protection, emotional care or response to known risk.
- **Child-on-child abuse:** bullying, discriminatory abuse, sexual violence or harassment, harmful sexual behaviour, hazing, initiation, exploitation, coercion or online abuse.

- **Exploitation:** child sexual exploitation, criminal exploitation, county lines, trafficking, modern slavery, financial exploitation or adults using access to football and opportunity as leverage.
- **Domestic abuse and family harm:** including a child seeing, hearing or experiencing the effects of abuse.
- **Online harm:** grooming, coercion, harassment, sexual images, threats, impersonation, unsafe livestreaming, cyberbullying or pressure to move to private or disappearing-message channels.
- **Radicalisation and discriminatory harm:** extremist grooming, hate incidents and abuse linked to race, sex, disability, religion, sexual orientation, gender reassignment or another protected or personal characteristic.
- **Adult safeguarding:** physical, sexual, psychological, financial or material abuse; neglect; self-neglect; discriminatory, domestic, organisational or modern-slavery concerns.
- **Wellbeing and self-harm:** suicidal thoughts, self-injury, eating distress, substance misuse or mental-health deterioration requiring an immediate welfare response.

## 8. Responding to a disclosure or concern

### Remember: receive, reassure, record and report

Listen calmly. Take the person seriously. Do not promise secrecy. Do not ask leading questions or investigate. Record their words and report immediately.

1. Make the immediate environment safe. If there is immediate danger, a serious crime in progress or urgent medical need, call 999.
2. Listen without judgement. Use open prompts only where necessary, such as “Tell me what happened.” Do not press for detail that is not needed for the immediate report.
3. Explain that the information must be shared with people who can help. Do not promise confidentiality.
4. Record as soon as possible: date, time, location, who was present, the exact words used, observations, injuries, actions taken and the recorder’s name. Separate fact from opinion.
5. Report immediately to the partner institution’s DSL where the activity is institution-based and to the NGPFA DSL where NGPFA activity, staff or participants are involved.
6. Follow the advice of the DSL, local authority, police, County FA or other competent agency. Do not contact an alleged perpetrator or conduct an internal fact-finding exercise before safeguarding advice.
7. Preserve relevant messages, images, video, attendance records or other evidence. Do not copy or forward illegal sexual images of children; seek police or safeguarding advice.
8. Continue to support the child or adult at risk without discussing the matter with people who do not need to know.

## 9. Reporting and escalation routes

| Situation                                                           | Action                                                                                                                                                           |
|---------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Immediate danger or urgent crime/medical emergency                  | Call 999. Provide first aid or emergency support within competence. Inform the relevant DSL as soon as safely possible.                                          |
| Concern during a school or college programme                        | Report immediately through the institution’s safeguarding system to its DSL. Inform the NGPFA DSL where NGPFA delivery, personnel or records are involved.       |
| Concern during independent NGPFA activity, tour or camp             | Report immediately to the NGPFA DSL. The DSL will contact the relevant local authority, police, host-country service, Surrey County FA or The FA as appropriate. |
| Concern about an NGPFA staff member, coach, contractor or volunteer | Do not investigate. Report immediately to the NGPFA DSL and the partner DSL where applicable. The DSL must seek LADO and football-safeguarding advice promptly.  |

| Situation                                         | Action                                                                                                                                                                                                                     |
|---------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Concern about the NGPFA DSL / Academy Director    | Report directly to another NGPFA director, the partner institution DSL, the relevant Local Authority Designated Officer, Surrey County FA or The FA. Do not report solely to the person who is the subject of the concern. |
| Concern not acted upon or disagreement about risk | Escalate to the partner's senior DSL, local authority, Surrey County FA or The FA. A person may contact police or children's/adult social care directly and must not allow organisational hierarchy to delay protection.   |
| Online sexual abuse or grooming                   | Preserve evidence safely and report to the DSL and police/CEOP as appropriate. Do not recirculate sexual images.                                                                                                           |

## 10. Key external contacts

| Service                                                    | Contact                                                                              |
|------------------------------------------------------------|--------------------------------------------------------------------------------------|
| Emergency services                                         | 999 for immediate danger or emergency. Police 101 for non-emergency crime or advice. |
| NGPFA DSL - Academy Director                               | academy@ngpfa.com   +44 7375 357123                                                  |
| Surrey County FA safeguarding                              | safeguarding@surreyfa.com   01372 387 090                                            |
| The FA Safeguarding Team                                   | Safeguarding@TheFA.com                                                               |
| The FA / NSPCC safeguarding helpline                       | 0808 800 5000                                                                        |
| West Sussex children's social care / Integrated Front Door | 01403 229900 (office hours)   0330 222 6664 (out of hours)                           |
| West Sussex LADO                                           | 0330 222 6450   LADO@westsussex.gov.uk                                               |
| West Sussex adult safeguarding                             | 01243 642121   urgent out-of-hours: 0330 222 7007                                    |
| Childline                                                  | 0800 1111                                                                            |

When an activity takes place outside West Sussex, the DSL must use the safeguarding contacts and procedures for the local authority where the child or adult is located or normally lives. On overseas activity, local emergency and safeguarding services must be used without delay, alongside UK organisational reporting.

## 11. Allegations, low-level concerns and poor practice

An allegation or safeguarding concern about a person who works with children must be treated seriously where the person may have harmed a child, may have committed an offence against a child, may pose a risk of harm, or may be unsuitable to work with children. The LADO for the area in which the employer or activity is based must be consulted in accordance with local procedures.

Low-level concerns are behaviours that may be inconsistent with the staff code of conduct, including over-familiarity, favouritism, humiliating language, inappropriate one-to-one situations, personal messaging, unnecessary physical contact or boundary breaches. "Low-level" does not mean unimportant. Concerns must be recorded and reviewed for patterns.

NGPFA may take immediate risk-management action, including changing duties or suspending contact, without deciding guilt. Employment, disciplinary, LADO, police, DBS, FA and partner processes must be coordinated. Confidentiality will be maintained so far as possible, but cannot prevent necessary reporting.

## 12. Safer recruitment and suitability

NGPFA applies safer recruitment proportionate to the role and partner requirements. This includes:

- a clear role description and safeguarding responsibilities;
- a formal application and scrutiny of employment history, gaps and reasons for leaving relevant roles;
- identity, address, right-to-work and qualification checks;
- at least two satisfactory references, including a relevant recent employer where possible;
- a structured interview including safeguarding and professional-boundary questions;
- the correct level of Enhanced DBS and Children's Barred List check where the legal eligibility criteria are met;
- Adults' Barred List or other checks where eligible and relevant to adult regulated activity;
- overseas criminal-record or professional checks where appropriate;
- checking sanctions, governing-body information and professional status where relevant;
- a written risk assessment for any exceptional supervised start before all checks are complete. No person may undertake unsupervised regulated activity until required checks are satisfactory; and
- probation, induction, conduct monitoring and continuing suitability review.

DBS checking is one part of safer recruitment and does not replace supervision, references, training or professional judgement. Suitability is reviewed annually and whenever information, conduct, a role change or partner requirement indicates that a new check or risk assessment is needed. The DBS Update Service may be used with the individual's permission where appropriate.

NGPFA will make a referral to DBS where the legal referral duty or power applies, and will cooperate with FA, County FA, LADO, police and regulatory processes.

## 13. Training, induction and supervision

- All staff and representatives receive safeguarding induction before or at the start of relevant duties.
- Safeguarding training and refresher activity are completed at least annually and at the level required by the role, The FA and partner institution.
- The DSL undertakes role-appropriate DSL, allegations, information-sharing and football safeguarding development.
- Briefings cover local reporting routes, code of conduct, online communication, tours, transport, media, medical information and emergency procedures.
- Managers address safeguarding in supervision, performance review, risk assessment and debriefing after significant incidents.
- Training completion is recorded and non-compliance may result in removal from duties.

## 14. Professional boundaries and code of conduct

Adults working for NGPFA hold a position of trust and must maintain professional, transparent and defensible boundaries. They must:

- treat all participants with dignity and avoid humiliating, sexualised, discriminatory, threatening or degrading language or behaviour;
- never engage in sexual or romantic behaviour with a child, groom a participant, exchange sexual messages or images, or exploit dependency, selection or opportunity;
- avoid favouritism, secret arrangements, personal financial dealings and gifts that create obligation or could be misunderstood;
- use only necessary, appropriate and explained physical contact connected with coaching, safety, first aid or care;

- avoid being alone with a child in an isolated or unobservable location. Where one-to-one work is necessary, use an open, visible or interruptible setting and follow the activity risk assessment;
- not provide alcohol, nicotine, illegal drugs, inappropriate supplements or medication, and not work while impaired;
- not use personal information, photographs or access to participants for private, commercial or exploitative purposes;
- challenge and report unsafe conduct by colleagues, partners, parents, scouts, agents or participants; and
- follow the stricter requirement where a partner institution's code or local procedure sets a higher standard.

## 15. Communication, social media and online activity

- Communication must have a clear programme, welfare or operational purpose and use approved channels wherever possible.
- Direct communication with an under-18 may occur only where appropriate to the programme, proportionate to age and risk, and permitted by the relevant institution or parental arrangements. Parents, guardians or another authorised adult should be included where practical, particularly for younger participants.
- Staff must not use disappearing-message settings, secret accounts, sexually suggestive language or communications they would be unwilling to show to a parent, manager or safeguarding professional.
- Personal social-media relationships, private late-night messaging and sharing personal or intimate information with participants are prohibited.
- Online sessions must use approved accounts, appropriate visibility and recording arrangements, with consent and safeguarding controls.
- Any concerning message, image, threat or disclosure must be preserved and reported rather than deleted or informally resolved.

## 16. Photography, filming and performance analysis

- Under-18 photography or filming requires parent or guardian consent and should respect the young person's wishes.
- The purpose and intended channels must be explained. Consent for publicity must be separate from participation and must not be a condition unless imagery is genuinely necessary for the activity.
- No image may be taken in a changing room, shower, bedroom or other private setting.
- Images should not be accompanied by unnecessary personal or location information that creates a risk.
- Performance-analysis footage must be stored, shared and retained securely and accessed only by authorised people.
- External media, scouts or visitors must be authorised, supervised and subject to the venue and consent rules.

## 17. Changing rooms, transport and one-to-one work

### 17.1 Changing rooms

Changing arrangements must consider age, sex, disability, supervision, privacy and venue rules. Adults should not routinely change or shower at the same time as children. Supervision should be proportionate and conducted without unnecessary intrusion. Mobile phones and image capture are prohibited in changing areas.

## 17.2 Transport

Organised transport requires suitable drivers, vehicles, insurance, seat belts, consent, passenger lists, emergency contacts and clear collection arrangements. Avoid transporting a child alone unless necessary, authorised and risk-assessed. Inform the parent/guardian and another responsible adult of the arrangements. Staff must not make unplanned private transport a routine convenience.

## 17.3 One-to-one activity

One-to-one coaching, tutoring, mentoring, treatment or welfare conversations must be justified, visible or interruptible, time-limited and recorded where appropriate. A parent, guardian, partner DSL or manager should know when and where it is taking place. Medical confidentiality does not remove safeguarding reporting duties.

## 18. Tours, residential activity and overseas camps

Every tour, residential or overseas camp must have a written safeguarding and operational plan covering:

- named trip lead and safeguarding contact, including 24-hour emergency communication;
- participant information, parental consent, passports, visas, insurance, medical and medication arrangements;
- staff vetting, competence, supervision ratios and gender-appropriate staffing;
- travel, rooming, headcounts, curfews, free time, changing, swimming and missing-person procedures;
- local laws, safeguarding services, emergency numbers, hospital and consular information;
- communication, social media, photography and contact with external coaches, scouts, agents or host families;
- alcohol, drugs, sexual behaviour, bullying, discipline and participant code of conduct;
- how incidents will be reported both locally and to NGPFA, partners, parents and UK agencies; and
- contingency arrangements for illness, arrest, lost documents, evacuation or inability to contact a parent.

Participants must never be placed with a host family or unsupervised adult without appropriate checks, agreements, risk assessment and a clear complaints and emergency route.

## 19. Medical needs, mental health and self-harm

Relevant medical and support information should be obtained before activity and made available only to people who need it. Medication and first aid must follow written consent, competence and recording requirements. In an emergency, protecting life and health takes priority.

A disclosure or sign of self-harm, suicidal intent, eating distress or serious mental-health deterioration is a safeguarding and welfare concern. Staff should listen, stay with the person where immediate risk exists, seek emergency or clinical support, inform the DSL and involve parents or carers unless professional advice indicates that doing so may increase risk.

## 20. Bullying, discrimination and child-on-child abuse

Bullying, hazing, banter used to excuse harm, discriminatory abuse, sexual harassment and harmful sexual behaviour are not accepted. Reports will not be dismissed as an inevitable part of football or group culture. The needs and safety of all involved will be assessed, while avoiding victim-blaming or forced mediation in serious cases. Partner behaviour and disciplinary procedures operate alongside safeguarding action.

## 21. Adult safeguarding

When an adult meets or may meet the Care Act definition, NGPFA will respond in a person-centred way and seek the adult's views and desired outcomes where it is safe to do so. A referral may be made without consent where there is immediate or serious risk, coercion, a crime, risk to others, concern about organisational abuse, inability to make the relevant decision, or another lawful public-interest reason. The local authority for the adult's location has the statutory safeguarding function.

## 22. Information sharing, recording and confidentiality

- Record promptly, factually and securely. Include decisions, reasons, advice received and actions taken.
- Use the partner institution's approved safeguarding system for institution-based concerns and ensure NGPFA receives sufficient information to manage its own staff, activity and risk.
- NGPFA-held safeguarding records will be stored in restricted encrypted storage, separate from routine participant records where practicable.
- Information will be shared only with people and agencies who need it to protect welfare, manage allegations, comply with law or provide support.
- Consent should be sought where appropriate, but a lack of consent does not prevent necessary child protection or serious-harm sharing.
- No member of staff may promise to keep a safeguarding disclosure secret.
- Safeguarding records are retained according to partner, statutory, FA/County FA, insurance and legal requirements and are not automatically deleted when participation or employment ends.

## 23. Whistleblowing and protection from retaliation

A person who reasonably reports a safeguarding concern, unsafe practice, concealment or failure to act will be supported and must not suffer retaliation. Concerns may be escalated outside NGPFA to a partner DSL, LADO, local authority, police, Surrey County FA, The FA, DBS or another appropriate body. Deliberately false and malicious allegations may be addressed, but an unproven concern is not automatically malicious.

## 24. Partnerships, contractors and visitors

Before delivery, NGPFA will establish the safeguarding expectations of the partner or contractor, confirm named contacts and ensure contracts include appropriate safeguarding, information-sharing, safer recruitment, incident and termination provisions. Visitors, scouts, agents, media and external specialists must be authorised, identifiable, supervised as appropriate and prevented from obtaining private access to participants or their data.

## 25. Complaints and professional disagreement

A complaint about service quality does not replace safeguarding reporting. Where professionals disagree about risk or action, the concern must be escalated through partner and local safeguarding procedures until a satisfactory response is obtained. The welfare of the person must not be compromised by organisational boundaries or reputation management.

## 26. Monitoring and quality assurance

The Board and DSL will monitor:

- training and safer recruitment compliance;
- DBS and suitability-review status;
- partnership safeguarding arrangements;

- concern, allegation, low-level concern and whistleblowing records;
- themes, delays, outcomes and lessons learned;
- tour, transport, online, media and one-to-one risk controls;
- participant and parent feedback; and
- implementation of actions following incidents, audits or legal changes.

## 27. Review

This policy will be reviewed at least annually and sooner after a serious incident, safeguarding review, material organisational change, partner requirement, FA/County FA update or change in law or statutory guidance. Contact information must be checked before every publication and before tours or activity outside the usual area.

## Appendix A: Immediate reporting checklist

| Check                                                   | Required action                                                                                                                            |
|---------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|
| 1. Is anyone in immediate danger?                       | Call 999 or urgent medical assistance.                                                                                                     |
| 2. Have you listened without investigating?             | Use minimal open prompts; do not promise secrecy.                                                                                          |
| 3. Have you recorded facts and exact words?             | Date, time, people, location, observations and action.                                                                                     |
| 4. Who is the correct DSL?                              | Partner DSL for institution-based activity; NGPFA DSL for NGPFA activity/personnel. Usually report to both where responsibilities overlap. |
| 5. Is the concern about an adult working with children? | Seek LADO and County FA/FA advice; do not conduct an internal investigation first.                                                         |
| 6. Has the concern been acted upon?                     | Escalate directly to local authority, police, County FA or The FA if necessary.                                                            |
| 7. Is evidence secure?                                  | Preserve messages and records; do not circulate illegal or sensitive content.                                                              |
| 8. Is ongoing support in place?                         | Protect privacy, manage contact and follow professional advice.                                                                            |

## Appendix B: Safeguarding concern record - minimum information

- Name and contact details of person recording the concern.
- Name, age/date of birth and programme of the child or adult at risk.
- Date, time and location of the incident, disclosure or observation.
- Exact words used and a factual description of observations or injuries.
- Names of witnesses or other people present.
- Immediate safety or medical action taken.
- Who was informed, when, by what method and what advice was received.
- Parent/guardian involvement or reason for not involving them.
- Referral, escalation and follow-up actions, with dates and decision reasons.
- Signature/name of recorder and DSL review.

## Approval and review

|                           |                    |
|---------------------------|--------------------|
| Approved by               | Board of Directors |
| Approval / effective date | 21 July 2026       |
| Next scheduled review     | 21 July 2027       |