

Carlisle United

Safeguarding Risk Management Policy



1 Overview

This is a high level statement of intent for risk management of Safeguarding.

This Safeguarding Risk Management Policy (RMP) outlines the club's approach to:

- **Identifying potential risks**
- **assessing any potential risks** to the safety, health and welfare of the Children and Vulnerable Adults attending the club
- **managing risks**, outlining the steps taken to either eliminate those risks or to reduce them

It details

- our **tolerance for Safeguarding risks**
- **assigns responsibilities** for monitoring risks, and
- sets **procedures for addressing** potential threats.

This RMP ensures a structured approach to risk management, promotes consistency, and aligns risk-taking with the club strategic vision, mission, values and objectives.

The risk management is factored into business planning, performance management, audit and assurance, business continuity management, and project management.

Purpose and principles

We are committed to safeguarding and promoting the welfare of young players. We expect all staff, volunteers, parents/carers, young players, any partner agencies or any commissioned service providers to share this commitment.

The purpose of the RMP is to provide guidance regarding the management of risk to:

- support the achievement of club objectives and its commitment to safeguarding
- protect staff and Club assets, and ensure financial sustainability

Scope

The RMP applies to all club activities, it forms part of CUFC's Safeguarding Governance Framework and it applies to all employees, contractors and volunteers.

2 Roles and responsibilities

Responsibility for Risk Management Policy and its implementation lies with the CEO and Board of Directors. They are responsible for the overarching risk management policy of the club. It will be approved on adoption and formally reviewed on an annual basis. The responsibilities of the Board may be delegated and staff must carry out risk assessments if requested to do so.

- **Board**; Provides policy, oversight and review of Risk Management
- **Heads of departments**; Overseas regular reviews of risk management activities
- **CEO & SSM**; Drives culture of risk management and signs off annual policies, procedures, and updated documentation in relation to safeguarding.
- **Safeguarding Working Group**; Continuously improving risk management policy, strategies and supporting frameworks
- **DSO**; Ensures staff within the Club comply with this Risk Management Policy and create a culture where risks can be identified and escalated.
- **Employees, contractors & volunteers**; Comply with Policies and Procedures

3 Definitions

We have identified the following broad Safeguarding risk categories:

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Abuse - is any form of physical, emotional, or sexual mistreatment or lack of care leads to injury or harm:

- **Physical abuse** Is when someone physically hurts or injures another person by hitting, shaking, throwing, poisoning, burning, biting, scalding, suffocating, drowning or otherwise causing harm.
- **Sexual Abuse** is where children or adults at risk are abused by an adult or child who use them to meet their own sexual needs.
- **Emotional Abuse** is the persistent emotional ill-treatment of an individual so as to cause severe and persistent adverse effects on the person's emotional development.
- **Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.
https://assets.publishing.service.gov.uk/media/68add931969253904d155860/Keeping_childre_n_safe_in_education_from_1_September_2025.pdf (See page 12)

Poor practice is the type of behaviour of an individual in a position of responsibility which falls below the club's required standard. Poor practice may not be immediately dangerous or intentionally harmful to an individual, however, is likely to set a poor example and lead to a build up of hidden risk.

4 Risk

4.1 Risk tolerance and objectives

The club's overall tolerance of Safeguarding risk is low (Risk score after mitigation of <8 targeted)

Managing Safeguarding Risk is a high priority for the club as a policy, which requires effective Risk Management.

4.2 Risk identification and assessment methodology

The Club will

- Identify and prioritise risks, enabling better resource allocation and budgeting (RMP). Focus on particular will be on those risks with a rating of >14 then >10
- Assess the level of risk different activities and decisions pose (SRR).
- Identify and assess risks to develop targeted risk mitigation strategies.
- Proactively identify potential problems, enabling timely mitigation.

When completing the risk management process the club ensure the following steps are taken;

- Establish the context
- Identify the risk
- Analyse the risk
- Evaluate the risk
- Mitigate/ address/ treat the risk
- Monitor and review the risk

These risks will be detailed in the club's Safeguarding Risk Register will be:

- review annually by the CEO and Board can be seen upon request
- prepared by the Safeguarding leads

4.3 Risk Categories

We have identified the following Business risk categories:

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- **Operational risk:** The risk of things going wrong in the day-to-day business operations due to factors like relegation, individual human error (bad practice), technical /IT failures, internal processes, or supply chain disruptions.
- **Financial risk:** The potential for financial loss due to industry fluctuations, liquidity issues, or changes in funding (especially ownership)
- **Strategic risk:** Threats to a company's long-term goals and strategic objectives, which can come from competitive pressure, or poor strategic decisions.
- **Compliance risk:** The potential for falling out of compliance with legal requirements, football regulations, or internal policies.
- **Reputational risk:** The potential for damage to the club's public image, which can harm its financial, market, and social standing.

5 Risk Assessment Policy

Carrying out Risk Assessment is a means by which the club can demonstrate that it is managing the risks in its activities. The objectives are:

- To ensure that major risks are identified in the SRR and managed as part of an overarching policy SMP with a view to promoting children's and adult at risk welfare
- To meet the requirement for a written risk assessment policy to be in place and to meet the requirement for leadership in and management of the football club
- To ensure that suitable and sufficient risk assessments are undertaken for activities where there is likely to be significant risk
- To identify control measures are implemented to control risk so far as reasonably practicable
- Ensure the risk assessments are recorded and reviewed when appropriate
- To identify those in the school responsible for conducting risk assessment and monitoring its implementation.

5.1 When to carry out a Risk Assessment

Written detailed risk assessments are undertaken for activities where there is likely to be moderate / significant risk as identified in the SRR. We consider three tiers in the SRR:

- Tier 1 Risk Score 15 or more – significant risk – full written detailed RA required
- Tier 2 Risk Score 8-12 – moderate risk – full written detailed RA required
- Tier 3 Risk score <8 – other measures per SRR

A list of areas (non-exhaustive) for risk written assessment is included at Appendix 1.

5.2 When to review a Risk Assessment

Risk assessments will be reviewed per the QAF:

- when there are changes to the risk activity
- after a near miss or accident p
- when there are changes to the type of people involved in the activity
- when there are changes in good practice
- when there are legislative changes
- annually if for no other reason

5.3 How to carry out a Risk Assessment

A risk assessment is simply a careful examination of what could cause harm to people, so that staff can weigh up whether they have enough precautions or whether more should be done.

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The club expects staff to use a common sense approach to risk as recommended by the Health and Safety Executive (HSE) who have set out a step-by-step approach to risk assessment, as follows: what could go wrong

- who might be harmed
- how likely is it to go wrong
- how serious would it be if it did
- what is the club going to do to stop it
- how is the club going to check that its plans are working

5.4 How to record a Risk Assessment

The findings regarding potential risks that might affect an activity should be recorded and then the manner in which they can be controlled to prevent harm set out.

This should be done on the standard RA form set out in Appendix 2.

Most importantly, other staff must be informed about the outcome of the risk assessment, as they will be the ones who will need to take action.

The risk assessment should be shared with other staff

5.5 Assessing Risk

The risk level determines which risks should be tackled first. Using a matrix can be helpful for prioritising your actions to control a risk.

It is suitable for many assessments but, in particular, to more complex situations. However, it does require experience to judge the likelihood of harm accurately.

Most activities will not need to use risk matrices. However, they can be used to help work out the level of risk associated with a particular issue. They do this by categorising the likelihood of harm and the potential severity of the harm. This is then plotted in a matrix (please see below for an example below).

Getting this wrong could result in applying unnecessary control measures or failing to take important ones. Please ask the Headmistress for help if you are struggling to assess any sort of risk.

RISK			IMPACT	
5	High risk	Frequent	5	High impact - possible effect on whole future of the Club
4	Medium high	Probable	4	Medium-high -very significant damage
3	Medium	Occasional	3	Material impact - moderate impact on the Club or individual
2	Low	Remote	2	Low impact - would effect the Club or individuals in the short term
1	Negligible	Improbable	1	Some negligible impact - short term

Risk Matrix

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Impact	High impact	5	10	15	20	25
	Medium / high	4	8	12	16	20
	Moderate	3	6	9	12	15
	Low	2	4	6	8	10
	Negligible	1	2	3	4	5
		Improbable	Remote	Occasional	Probable	Frequent
		Likelihood				

5.6 Risk control implementation

This covers internal controls and procedures used to mitigate identified risks. In 2025 the club adopted a new risk management system for safeguarding when the implementation of a Safeguarding Governance Framework (SGF).

Key elements are:

- Risk Management Policy (RMP)
- Safeguarding Strategy (SS) including Safeguarding Implementation Plan (SIP)
- Safeguarding Risk Management Plan (RMP)
- Safeguarding Risk Register (SRR)
- Risk Assessments and mitigations (RA)
- Quality Assurance Framework (QAF)
- Safer Recruitment – procedures for hiring staff
- Policies and Procedures

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6 Incident response

6.1 Thresholds for reporting

All incidents of safeguarding reported to the club will be recording on the electronic system.

- The encouraged route is direct self-reporting via either :
 - whatsapp Microsoft form – for academy staff, parents and players
 - written text form – “issue of concern report form”
- These are sent to the DSO for evaluation in consultation with SSM
- Other reports will be opened by the Safeguarding leads (DSO. SSM. MDSO)

6.2 Initial classification

Reports will be categorised initially into five categories as per QAF

4	High impact	• Third part harm suffered • Risk crystalises • Significant Loss suffered • Significant damages suffered • Police / LADO FA / NL /EFL action
3	Moderate	• Level 2 characteristics + risk of medium/high damage but did not crystalise • Significant disciplinary action • LADO referral – but no action
2	Moderate	• Breach of policy • Disciplinary action likely • No damage
1	Low level	• Poor practice • Practice reminders issues • No disciplinary unlikely • No damage or harm
0	Not a safeguarding issue	• No safeguarding aspect • May be referred to other parts of the club (eg HR) • Academy compliance (not safeguarding)

This will drive the scale and speed of response.

Response

Ensure that appropriate action is taken when where incidents arise (eg policies and procedures have been breached):

- follow Management of Allegations Policy and other appropriate polices
- operate with segregations of duties and roles and responsibilities in place
- follow policies and procedures
- adopt a multi-disciplinary approach
- supervision and governance by the 1921
- case reviews at conclusion of incidents per QAF

7 Monitoring and reporting

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Establishes procedures for regularly monitoring risks, reporting changes, and reviewing the effectiveness of the risk management process as detailed in the QAF (including Sections 8 & 10).

8 Review of RMP

The RMP will be reassessed and amended on an ongoing basis by the CEO

The Leadership Group will be briefed each week on Safeguarding matters by the CEO

The 1921 Board will review and approve the RMP annually

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1921 Board approval	November 2025	
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Next review - annual	By 30 June 2026	1921 Board
Signed		Nigel Clibbens Chief Executive



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Appendix 1 Risk Assessment

The following areas of risk as identified in the Safeguarding Risk Register require specific Risk Assessment as a matter of policy per this RMP.

Tier 1 (risk score 15 or more) per SRR

- Accommodation - Host Families
- Overseas trips
- U18 with first team including – Overnight trips
- Matchday safeguarding- including Ball Boys, Flag Bearers & Mascots
- Poor practice – staff/ personal behaviour
- Transport of players
 - Transport
 - Player collection

Tier 2 – Moderate risk per SRR (risk score 8-14) per SRR

- Physical Safety
 - Inappropriate physical contact
 - Changing rooms
 - Facilities and sites
- Response to safeguarding concern or allegation
- Board oversight

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Appendix 2 RA Template:

Assessor:						Date:					
Location:				Time:		Tasks being assessed:					
Review Date:								Signature:			

What is the hazard?	Who might be harmed?	How might people be harmed?	Existing Control Measures	Risk rating			Additional Control Measures	Residual Risk			Monitored by whom	Monitored by when
				L	C	Score		L	C	Score		
				L	C	R		L	C	R		
			•				•					
			•				•					
			•				•					