



CARLISLE UNITED

Safeguarding strategy and Safeguarding Implementation Plan

2025-2028



1. Strategic vision

This is our Safeguarding Strategy which will guide our work in this area.

The strategy is for the period to 30 June 2028. It is about everybody in the Club building on and developing an embedded culture of constant vigilance in relation to safeguarding in our Club and its activities. We need to further embed safeguarding throughout the club, and to ensure our preventative strategies developed in the previous strategy “Safer Together” in the last period to June 2025 and amend and adapt our approach and plans to reflect the learnings and changing requirement.

We recognise that as a professional Club, we have a duty of care to all children, young people and adults at risk who participate in activities delivered by us and who we deal with. This strategy outlines our arrangements to meet that duty.

2. Overview

The club has a top-level commitment to safeguarding which promotes practice and behaviours that value children and adults at risk, creates a culture of accountability and drives continual improvement.

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

We have a proactive and integrated approach to safeguarding. We will continue to develop our approach to safeguarding. We will do everything within our control to prevent harm and abuse from happening within our Club and when allegations and disclosures occur, we will respond quickly, appropriately and effectively in order to safeguard those in our care.

There can be no safe sport in an unsafe society, we expect sport and ourselves to be held to a higher standard. We can reduce risks and learn from previous cases.

Carlisle United will develop, and will continue to review, this Safeguarding Strategy and the key element including Safeguarding Governance Framework, Risk Management Plan, Risk Policy, Safeguarding Risk Register various safeguarding policies (including a Children Protection Policy and an Adults at Risk Policy) as well as our overall and working methods and procedures for our operations.

Our documents endorse and promote our Safeguarding Policy and Procedures.

3. Strategic Areas

We have identified seven Strategic Areas, consistent with those of the EFL which are our areas of focus to achieve our overall vision:

- i. **Leadership, governance, and culture** –
The club has a top-level commitment to safeguarding which promotes practice and behaviours that value children and adults at risk, creates a culture of accountability and drives continual improvement.
- ii. **Roles and responsibilities** - While the Club's Board is ultimately responsible for ensuring that there are effective safeguarding measures in place, there is a clear expectation that safeguarding is everyone's responsibility
- iii. **Prevention; policies, procedures and practice** – There are robust safeguarding and related policies and procedures in place to promote and protect the rights, safety and wellbeing of children and adults at risk
 - The Club promotes and maintains high standards of behaviour and practice
 - There are robust safer recruitment procedures in place to prevent unsuitable individuals from working with, having access to, or influence over children and adults at risk
 - The Club ensures that physical and online environments promote safety and wellbeing while minimising the opportunity for children and adults at risk to be harmed and/or exposed to harmful or inappropriate behaviour, materials or content.
 - There are robust measures for identifying, meeting and monitoring additional needs and vulnerability
 - There are robust governance measures, policies and procedures in place for care and accommodation arrangements.
 - There are effective measures for protecting against extremism and radicalisation
- iv. **Educating and empowering** – Everyone is trained and empowered to fulfil their safeguarding responsibilities, to access support and report concerns. Children and Adults at Risk are informed about their rights and everyone is equipped with safeguarding knowledge and skills.
 - Everyone is made aware of their safeguarding responsibilities and the Club's expectations when commencing their role.
 - There is a clear commitment to developing a workforce who are competent and empowered to create safe environments, recognise safeguarding concerns and risks, and to take appropriate action to protect the safety and wellbeing of children and adults at risk
 - Children and adults at risk are informed about their rights and are empowered to access support and report concerns.
 - Safeguarding, complaints and whistleblowing policies and procedures are accessible and widely promoted
- v. **Protection** – There are effective measures in place for responding to safeguarding concerns and allegations. Concerns and complaints are taken seriously and responded to swiftly and appropriately.
 - There are robust and widely promoted policies and procedures for reporting and responding to all types of concern.
 - There is an effective electronic case management system for recording and tracking safeguarding concerns and allegations
 - The Club's response to safeguarding concerns and allegations is robust

- vi. **Working together** – Working together underpins the Club's approach to promoting and protecting the rights, safety and wellbeing of children and adults at risk. There is a clear commitment to working together to promote and protect the safety and welfare of Children and Adults at Risk:
- There is a collaborative and cohesive approach to promoting and protecting the rights, safety and wellbeing of children and adults at risk.
 - There are effective safeguarding due diligence and quality assurance measures embedded in partnerships, commissioned services and affiliated activities that involve attendance by, or participation of, children and/or adults at risk.
- vii. **Listening culture** – There is a culture that promotes listening to and acting on the experiences and views of stakeholders to drive continual improvement:
- The Club proactively seeks and acts on feedback from stakeholders on a regular basis to strengthen its safeguarding arrangements
 - There is a culture of listening to children and adults at risk and taking account of their experiences and views in individual decisions and to inform enhancements to the Club's approach to promoting and protecting their rights, safety and wellbeing.

4. **Safeguarding Governance Framework - Responsibility and review**

The CEO will draft the Safeguarding Strategy in consultation with the Safeguarding Team of the SSM DSO and MDSO reflect the Safeguarding Governance Framework (SGF).

It will be implemented on an on-going daily basis by the Safeguarding Team comprising the SSM, DSO and MDSO and SWG reporting to the CEO

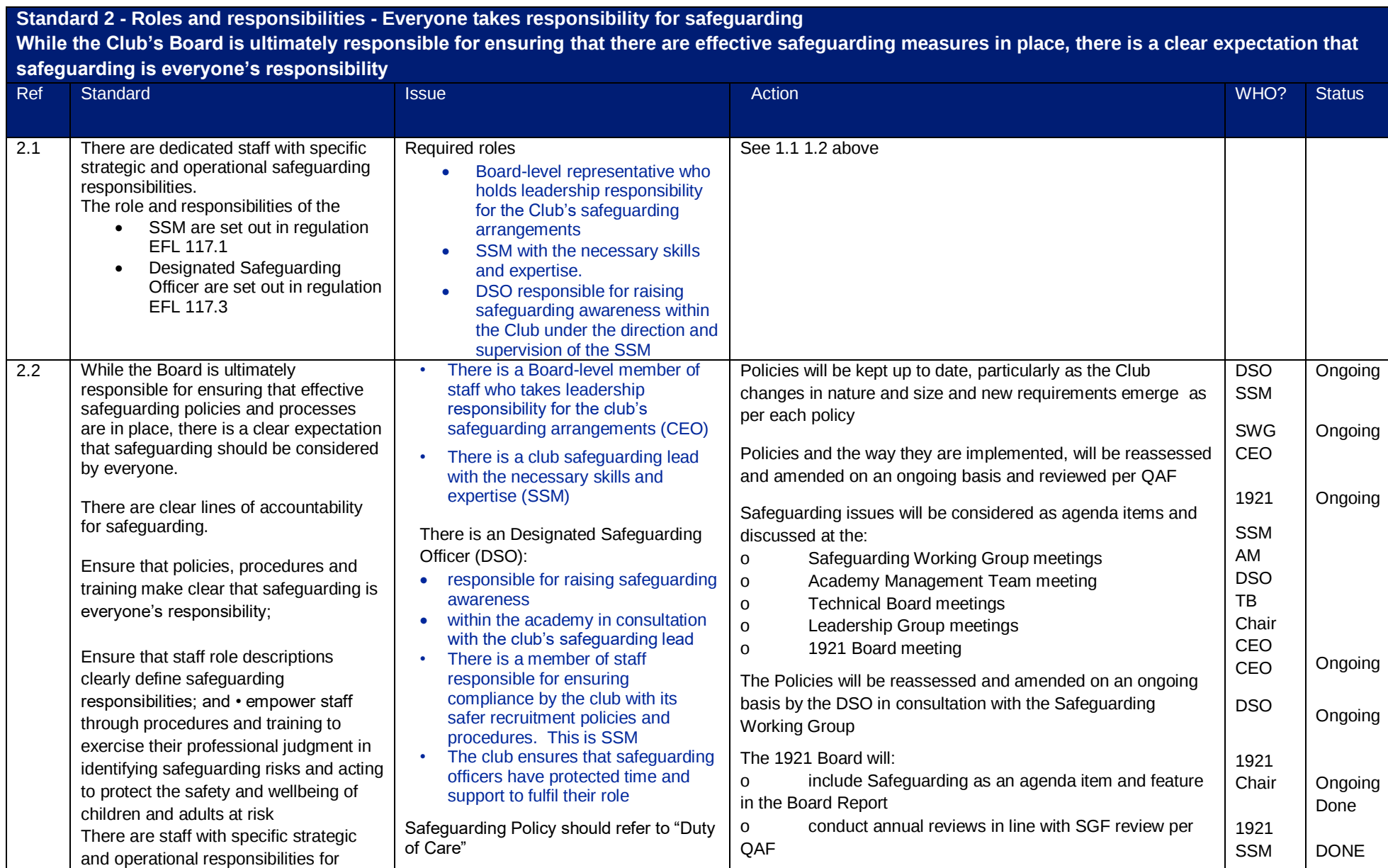
This Strategy will be kept up to date, particularly as the club changes in nature and size and new requirements emerge.

To ensure good governance, the Strategy and the way it is implemented, will be reassessed, amended and reviewed per the QAF as follows:

- The Strategy 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:
 - approve the Safeguarding Strategy
 - review as detailed in the SGF and its key elements
 - consider Safeguarding as an agenda item and feature in the Board Report
 - publish this Safeguarding Strategy on its website

5. Safeguarding Implementation Plan

Standard 1 - Leadership, governance and culture - Safeguarding is embedded in organisational leadership, governance and culture. There is demonstrable top-level commitment to safeguarding which promotes practice and behaviours that value children and adults at risk, creates a culture of accountability and drives continual improvement.					
Ref	Standard	Issue	Action	Who?	Status
1.1	Responsibility and accountability for safeguarding exists at the highest level of the Club. There is demonstrable top-level commitment to safeguarding that creates and reinforces attitudes and behaviours that value children and adults at risk, creates a culture of accountability and drives continuous improvement.	There is a safeguarding strategy with actions forming an implementation plan. The club has a robust and transparent safeguarding governance framework to drive accountability and continual improvement. It includes actions that support and work towards achieving the safeguarding strategy aims. The plan is appropriately resourced, for example: staff, time, work programmes and budget. Ensure that the rights, safety and wellbeing of children and adults at risk are embedded in organisational values, strategic priorities and delivery plans. Ensure that adequate resources are devoted to implementing effective safeguarding measures;	Safeguarding strategy 2025-28 and Safeguarding Implementation Plan to be updated: • PREPARED BY CEO • ADOPTED BY 1921 BOARD IN NOV 2025 Establish Safeguarding Governance Framework – detailing how approach fits together: • SGF PREPARED • SGF ADOPTED BY 1921 BOARD • PUBLISHED ON WEBSITE • SAFEGUARDING ORGANISATION AND STRUCTURE CHARTS Prepare and maintain Safeguarding Risk Register • PREPARED BY CEO • ADOPTED BY 1921 BOARD 1921 board appoints a Safeguarding Champion • CEO APPOINTED 1921 BOARD SAFEGUARDING CHAMPION Budget for Safeguarding Team approved by 1921 Board • 25/26 budget approved Safeguarding to be a standing agenda item within Executive reports at Board meetings. • Standard Board report to be established and adopted	CEO 1921 CEO 1921 CEO DSO CEO 1921 1921 Board DSO	Done Done Done Done Done Done Done Done Done Ongoing Done
1.2	Named personnel including: • Board member champion • Senior Manager and • Designated Safeguarding Officer who are responsible for safeguarding within the Club. There is a named Safeguarding DSO with clearly defined roles and responsibilities to lead on safeguarding and child protection	Names and contact details of these individuals will be published on the Club website, and clear procedures for • escalating concerns relating to safeguarding and • whistleblowing made available and understood by all staff and stakeholders Ensure that appropriate action is taken when policies and procedures have been breached	SSM job role approved DSO and MDSO job role approved Safeguarding contact details available on: • Each policy • Club Charter • Club Safeguarding Contacts page on website • Whistleblowing policy in staff handbook and on website • Complaints policy, Low level concern policy and Managing allegations policy all on web • Contacts section of site web RMP in place (section 6)	DSO SSM	Done Done Done Done Done Done Done Done



	• safeguarding and • safer recruitment. Safeguarding roles and responsibilities are clearly defined and regularly reviewed Everyone champions attitudes, behaviours and practices that respect the rights of all children and adults at risk and promotes their safety and welfare		o publish the SGF on its website Club to recruit a FT HoE to increase hours for Safeguarding DSO role Annual review of SSM DSO MDSO roles QAF – section 10	1921 SWG	25/ 6 done Ongoing
2.3	Delegation of responsibilities is clear and there is a positive culture that embraces safeguarding. The policies and procedures are reviewed on a regular basis and comply with legislation.	Club and Academy Policy and Procedures should be reviewed annually at minimum or whenever there is a legislative change, to maintain guidance and compliance with national and local legislation.	Ongoing review by CEO and Safeguarding team Annual review by 1921 See QAF section 10	CEO 1921	Ongoing 30/6/26 Ongoing

Standard 3 - PREVENTION: POLICIES, PROCEDURES AND PRACTICE There are robust safeguarding and related policies and procedures in place to promote and protect the rights, safety and wellbeing of children and adults at risk					
Ref	Standard	Issue	Action	Who?	Status
3.1 a	Have robust safeguarding policies and procedures that are consistent with relevant legislation, statutory guidance, international treaties, FA and NL/ EFL regulations and guidance;	The Club has written and published safeguarding policies and procedures available to all	Establish policies: - Safeguarding Policy - Child Protection Policy - Vulnerable Adults at Risk Policy - Anti radicalisation Policy - Managing Allegations Policy - Complaints Policy - Low level concerns Policy	SSM DSO SWG	DONE and updated annually
3.1 b	Ensure safeguarding is embedded in associated policies and procedures, for example, recruitment and selection, procurement, IT acceptable use, care and accommodation, whistleblowing, data protection, domestic abuse, mental health and wellbeing	The Club has written and published safeguarding policies and procedures available to all	Establish policies: - Accommodation Policy - GDPR Data Policy - Mental Health Policy - Safer Recruitment Policy Implement findings of external reviews See QAF section 10	SSM DSO SWG SSM DSO	DONE and updated annually Barnados Ongoing
3.1 c	Ensure that safeguarding and related Club policies and procedures are reviewed annually or whenever there is a significant incident or change within the Club, or changes to relevant legislation, statutory or football authority guidance.	Review - when there are changes to the risk activity - after a near miss or accident - 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	All policies have review dates and review responsibilities QAF (Section 10)	DSO DSO	Ongoing Ongoing
3.1d	The Club clearly communicates any changes in policy to all relevant staff The Safeguarding policy and complaints policy should be actively promoted and accessible to all staff, parents/carers and young people	The Club has written and published safeguarding policies and procedures available to all	All policies on the website including: - Whistleblowing Policy - Managing Allegations Policy - Complaints Policy All policies in Staff Handbook All policies in the Academy Handbook SWG shares best practice. Update at Weekly staff meetings and via email	DSO CEO DSO SSM CEO	DONE DONE DONE Ongoing

3.2	The Club promotes and maintains high standards of behaviour and practice	Have standards of practice and behaviour for all employed, commissioned or contracted persons (whether in a paid or voluntary capacity); • have codes of conduct/behaviour expectations for parents, carers and spectators; • have behaviour policies for children and adults at risk which acknowledges behaviour as a form of communication, includes appropriate sanctions and prioritises educational and supportive responses; and • ensure that where there are concerns about behaviour, assessments are undertaken to determine whether there are any underlying factors requiring protective and/or supportive intervention.	Codes of conduct for: • coaches • parents • players Behaviour Policy	DSO	DONE
3.3	There are robust safer recruitment procedures in place to prevent unsuitable individuals from working with, having access to, or influence over children and adults at risk	Clubs are required to ensure that procedures and practises are consistent with Safer Recruitment Guidance as outlined in statutory legislation and EFL regulation 122	Safer Recruitment Policy in place	HR	Ongoing
3.4	The Club ensures that physical and online environments promote safety and wellbeing while minimising the opportunity for children and adults at risk to be harmed and/or exposed to harmful or inappropriate behaviour, materials or content.	Clubs are required to ensure that procedures and practises are consistent with statutory guidance and legislation Match day and event safeguarding policies and procedures are consistent with relevant legislation and guidance (including Green and Purple Guides), football authority requirements and guidance Match day and other stadium events have a safeguarding officer responsible for all safeguarding arrangements who works in effective partnership with those responsible for match day/stadium event command, control and co-ordination arrangements Safeguarding is embedded in match day/stadium event planning, pre-briefs, debriefs, test and exercise assurance measures Match day and stadium event stewards complete safeguarding training as approved by the League	Internal filters on IT in place for: Gambling, Adult material Matchday Safeguarding Policy and Risk Assessment for Safeguarding risks Ticket Policy MDSO in place Match Risk Assessment and plans Workforce Development Plan	FD DSO SO CEO CEO SO DSO DSO	Ongoing DONE Done Each game Ongoing
3.5	There are robust measures for identifying, meeting and monitoring additional needs and vulnerability	Implement effective measures to proactively identify, meet and monitor additional needs and vulnerability; Maintain an evidence-based and flexible approach to additional needs and vulnerability, for example, family life and experiences, adverse childhood experiences, involvement with statutory services, how protected characteristics may impact life experience, learning	Measures • Voice of Player • Voice of Parent • Weekly reviews • Daily interaction • School reports	HoPC HoPC MDT Coach HoE	Ongoing Ongoing Ongoing Ongoing Ongoing

		needs, disabilities, physical or mental health issues; and Maintain accurate records of additional needs and vulnerability, the support provided and liaison with partners, for example, with schools and statutory partners.	Include on Kitlabs Seek school reports	HoPC HoE	Ongoing Ongoing
3.6a	There are robust care and accommodation policies and procedures which:—reference associated Club policies and procedures, for example: - recruitment and selection/safer recruitment, safeguarding, concern and allegation management, data protection, complaints and whistleblowing;—align with local authority procedures and private fostering regulations - ensure that the SSM and DSO have oversight of risks and the effectiveness of mitigation measures (to be recorded in the risk register);—includes: - clarity on roles and responsibilities - ensures effective interdisciplinary (including safeguarding team representation) to identify, meet and monitor the needs of children placed with care and accommodation providers; - includes safeguarding expertise in selection, approval and review panels/processes; - details all procedures to be followed, for example, - recruitment and selection, - suitability assessments, - matching and placements - recording and data protection, - monitoring and suitability reviews; Ensures the safeguarding team leads the response to safeguarding concerns and allegations and that the safeguarding team is involved in reviewing all complaints against care and accommodation providers and/or decisions to terminate services; - ensure that care and accommodation providers are appointed in accordance with the safer recruitment requirements set out in Safeguarding Standard 3.3 - subject to suitability assessments undertaken by staff with appropriate knowledge and experience in assessing the suitability of individuals providing care outside of the family home. - These assessments must consider the suitability of prospective care and accommodation providers and the adequacy of the facilities being offered, including children having their own bedrooms; - ensure that recruitment and selection procedures encourage applications from diverse and representative applicants; - when appointing care and accommodation providers, avoid potential conflict of interest and risk associated with employees caring for and accommodating children in their own homes; - ensure there are contractual agreements with care and accommodation providers which include safeguarding obligations; - ensure that prior to placing any child in their care, care and accommodation providers are inducted in accordance with the requirements set out in Safeguarding Standard 4.1	Accommodation Provider Policy & Plan including: Recruitment of providers (no new providers in 2025) Accommodation on SRR as Tier 1 risk SSR	DSO Board	Done Done	
			Accommodation Provider Agreements in place	DSO	Done

	○ ensure that accurate records are maintained; ○ ensure that care and accommodation providers are included in the Club's safeguarding workforce development plan (see Safeguarding Standard 4.2)		WDP	DSO	Done
3.6b	Implement regular care and accommodation provider suitability reviews; Ensure that matching processes and placement plans take account of specific needs and include meaningful consultation with children and their parents/carers. Additionally, there must be measures to seek their feedback on care and accommodation providers as part of suitability review procedures and have their views considered when determining if a placement is to be sustained or changed; Have documented individual placement plans with quality recording detailing how children placed with care and accommodation providers will be cared for and demonstrate how specific needs have been considered and will be met; Ensure that placements are monitored and reviewed, including through stakeholder consultation and documented scheduled and unannounced visits by identified staff; Ensure there is effective communication and partnership working between the Club, care and accommodation providers, children and their parents/carers; and Proactively monitor the effectiveness of care and accommodation		Accommodation Provider Policy & Plan • Documented scheduled and unannounced visits by identified staff • Player and host feedback Individual Placement Plans : • Initial placement • Monitoring reviews	DSO	Done Ongoing Ongoing
3.7	There are effective measures for protecting against extremism and radicalisation.	Clubs are required to ensure that procedures and practises are consistent with the statutory Prevent Duty Guidance	• Anti radicalisation Policy		
3.8	The identification and mitigation of safeguarding risk is incorporated into effective risk assessment processes at all levels i.e. from identification of organisational risks through to planning an activity		Safeguarding Risk Register • Prepare and maintain and review • See QAF section 10 Establish a Risk Management system • Adopt Risk Policy • Implement Risk Management Plan • Risk Policy • NL Risk Assessment compliance Risk Assessments in place for key risks identified in the SSR: • Accommodation - Host Families • Player and staff Mental Health • Overseas trips • Overnight trips • Third party relations - sexual abuse • Inappropriate physical contact • Matchday safeguarding • Poor practice - personal behaviour • Staff behaviour	SSM 1921 1921 1921 1921 DSO	DONE DONE DONE DONE DONE 30/6/25 11/25

		• Transport of players • Physical Safety • Response to safeguarding concern or allegation • Board oversight		
3.9	The Safeguarding Policy and Complaints Policy should be actively promoted and accessible to all staff, parents/carers and young people	On website	DSO	DONE

Standard 3 - PREVENTION: POLICIES, PROCEDURES AND PRACTICE
There are robust safeguarding and related policies and procedures in place to promote and protect the rights, safety and wellbeing of children and adults at risk

Ref	Standard	Issue	Action	WHO?	Status
3.10	The Club has safer recruitment and selection procedures for all personnel including volunteers in line with Keeping Children Safe in Education	Club Safeguarding Policy or Recruitment policy should make reference to Sexual Offences Act 2003 and a paragraph on what info should be reported to DBS and to FA Deal with issues of concern in accordance with Managing Allegations Policy	Implement Safer Recruitment policy Induction Checklist for each new starters: Complete from YD2 self- declaration form for all staff annually no later than 1 July each year. Counter sign by DSO. Include on SCR (rule 13)	DSO DSO DSO All staff	DONE Ongoing Annually by 1 July
3.11	The Clubs recruitment and selection procedures include methods for exploring candidates' attitudes to children and perception of acceptable behaviour Recruitment and selection procedure and HR process that seeks to identify individuals who are unsuitable to work with children, young people and adults at risk Recruiting managers demonstrate confidence and awareness of the club's safer recruitment policies, procedures and expectations	Safer recruitment procedures include: ✓ Ensuring recruiters and interviewers are appropriately trained and supported ✓ a thorough application process ✓ Openly promote the club's commitment to safeguarding when advertising roles that involve working with children/adults at risk ✓ Scrutinising information provided in applications and CVs ✓ Conducting value and competency-based interviews ✓ Obtaining at least two written references ✓ Qualification verification ✓ Identity verification ✓ Where there is eligibility, criminal record checks and adherence to the rechecking	Implement Safer Recruitment policy Single central record should be kept to record attendance for safeguarding training for ALL staff Adverts to include commitment to Safeguarding Safeguarding statements are delivered at all interview panels for all interview Enhanced or standard DBS checks are completed on all staff and volunteers who have contact with children and young people (stewards) Safeguarding question should be asked at all interview panels if you want to create a culture of "Safeguarding is everybody's responsibility" From the Kit person to the CEO Induction Checklist in place:	CEO MDSO MDSO DSO DSO/MDSO DSO DSO	DONE Ongoing Ongoing Ongoing Ongoing Ongoing Ongoing

Standard 3 - PREVENTION: POLICIES, PROCEDURES AND PRACTICE

There are robust safeguarding and related policies and procedures in place to promote and protect the rights, safety and wellbeing of children and adults at risk

Ref	Standard	Issue	Action	WHO?	Status
	Safer recruitment policies and procedures are consistently implemented	period outlined in club policies ✓ Measures to assess and manage risk in relevant circumstances ✓ Role descriptions which properly record responsibilities ✓ Employment contracts, casual worker and volunteer agreements	Contracted detail : - Roles and responsibilities	FD	Ongoing
3.12	Enhanced or standard DBS checks are completed on all staff and volunteers who have contact with children and young people	Stewards that work in family enclosures, disability stand and stop and search should be DBS checked at the highest level	Stewards that work in the family enclosure, disability and stop and search all have appropriate DBS checks	MDSO	ONGOING
3.13	Recruitment and selection procedures include methods for exploring candidates' attitudes to children and adults at risk, perception of acceptable behaviour	Safeguarding is embedded within the interview process. Value based interviewing takes place Candidates are asked safeguarding related questions at interview which demonstrates the candidate's knowledge and previous experience in relation to safeguarding	Interview notes report - to record meeting discussion - Safeguarding questions asked Electronic file for each new recruit	Interviewers	ONGOING
3.14	Additional vulnerability is carefully considered, and appropriate measures and support provided, for example: those with disabilities, from BAME backgrounds, those who identify as LGBTQ, those in elite sporting environments, Children playing or working in an adult environment, those in substitute accommodation arrangements, those in care, care leavers and looked after children	Policies, guidance and training address additional vulnerability to support staff understanding and equip them with the necessary knowledge and skills to meet the needs of children and adults at risk The club is aware of numbers of vulnerable individuals it engages with. There is demonstrable evidence that they are adequately safeguarded and that their needs are being met The club seeks relevant information about additional needs and demonstrates that these are met.	Specific training for SSM DSO MDSO Utilise, NL , FA and local authority resources: (LADO resources) Utilise CSCP training e-learning modules on line Ongoing open door policy meetings for DSO and SSM SSM DSO MDSO member of Whats app group for best practice sharing	DSO	ONGOING ONGOING ONGOING ONGOING ONGOING

Standard 3 - PREVENTION: POLICIES, PROCEDURES AND PRACTICE

There are robust safeguarding and related policies and procedures in place to promote and protect the rights, safety and wellbeing of children and adults at risk

Ref	Standard	Issue	Action	WHO?	Status
3.15	The club's recruitment and selection procedures include methods for exploring candidates' attitudes to children and adults at risk, perception of acceptable behaviour	Safeguarding is embedded within the interview process. Value based interviewing takes place Candidates are asked safeguarding related questions at interview which demonstrates the candidate's knowledge and previous experience in relation to safeguarding	Interview questions list in operation	DSO	DONE
3.16	Additional vulnerability is carefully considered, and appropriate measures and support provided, for example: those with disabilities, from BAME backgrounds, those who identify as LGBTQ, those in elite sporting environments, Children playing or working in an adult environment, those in substitute accommodation arrangements, those in care, care leavers and looked after children	Policies, guidance and training address additional vulnerability to support staff understanding and equip them with the necessary knowledge and skills to meet the needs of children and adults at risk The club is aware of numbers of vulnerable individuals it engages with. There is demonstrable evidence that they are adequately safeguarded and that their needs are being met The club seeks relevant information about additional needs and demonstrates that these are met	Coaches to undertake NL and FA remote digital training to upskill knowledge Build relations with LADO and CSCP and police CFA to join SWG 2025 Scheduled support for DSO in formal bi-weekly meetings. Minutes recorded	DSO DSO SSM MDSO	ONGOING ONGOING DONE Q1 2025 DONE
3.17	The club articulates its values and expectations of behaviour in codes of ethics and conduct There is an environment where individuals feel comfortable and confident in challenging and/or reporting breaches. There are clear procedures and support available for individuals reporting a breach and those finding themselves the subject of a complaint/ allegation.	Club values and expected standards of behaviour are in place for all staff, children, adults at risk, their parents/ carers and activity spectators Consequences and procedures for dealing with breaches are made clear Expected standards of staff behaviour include information about positions and relationships of trust There are measures to assess awareness and understanding. Work is	Academy information book (section 4) contains codes of conduct for: - coaches - parents - players Staff Handbook contains: - ethics and conduct (section 4) - staff social media policy (section 12) - disciplinary process in staff handbook (section 5) Accommodation Code of Conduct in place for Academy Players Also in place - Whistleblowing Policy	DSO MDSO AM DSO	DONE DONE DONE

Standard 3 - PREVENTION: POLICIES, PROCEDURES AND PRACTICE

There are robust safeguarding and related policies and procedures in place to promote and protect the rights, safety and wellbeing of children and adults at risk

Ref	Standard	Issue	Action	WHO?	Status
	Breaches are taken seriously and acted on in line with relevant procedures, for example, staff disciplinary procedures and managing allegations against staff	undertaken to provide clarity and further guidance where necessary	- Managing Allegations Policy - Complaints Policy - Sexting Policy Accommodation Provider Agreement contains commitments to safeguarding conduct.	DSO	Ongoing
	Safeguarding and related procedures are implemented and there are measures to evaluate implementation and understanding. Where appropriate, implementation priorities are identified and resourced. There are quality assurance processes to assess understanding, implementation and consistency in delivery	Everyone demonstrates awareness of and confidence in the club's safeguarding policies, procedures and expectations There is demonstrable evidence that safeguarding and related policies and procedures are consistently implemented across club activities.	All key policies are public on the website Implement Quality Assurance Framework (QAF) External review by NL External review by LADO (where possible) External review by CFA (via SWG) External review by Barnado's as applicable Budget for dedicated resource 25/26	CEO DSO MDSO NL LADO CFA Barnado's 1921	DONE 31/12/25 Ongoing Ongoing N/A Ongoing Ongoing DONE
3.18	The club regularly assesses whether procedures are effective in practice or if further development or improvement is required Feedback is sought from all levels of the club as part of the review process to assess the extent to which procedures are embedded, identify any gaps in procedures and to ensure they are cohesive, for example: activity debriefs, focus groups, online surveys and training evaluation processes	Safeguarding and related policies and procedures are reviewed annually or whenever there is a significant change in the club, legislation, statutory or football authority guidance, or after any significant safeguarding incident. Review periods and policy versions are included in policies and procedures and a record of changes/ additions is kept	Annual review as part of See QAF section 10 by: - SWG – MDSO DSO SSM - CEO 1921 board External review by LADO [sought] Annual NL Safeguarding Compliance Version details recorded on each policy Ongoing internal audit checks See QAF section 10	All internal LADO NL DSO SSM	Ongoing N/A 30 June 25 DONE ONGOING ONGOING

STANDARD 4 – EDUCATING AND EMPOWERING - Everyone is trained and empowered to fulfil their safeguarding responsibilities, to access support and report concern					
Ref	Standard	Issue	Action	Responsibility	Status
4.1	Everyone is made aware of their safeguarding responsibilities and the club's expectations of them when commencing their role	Ensure all staff can access all relevant safeguarding policies and procedures online. (staff access only).	Induction process is now delivered for new staff across Academy and Club. - Induction checklist	DSO	ONGOING
		The Club has induction processes for all staff and volunteers that includes familiarisation with safeguarding policies and procedures	Publish on website: - Complaints Policy - Safeguarding Policy - Whistleblowing Policy	DSO	DONE
			Academy handbook circulate annually	MSDO	DONE
4.2	There is a clear commitment to developing a workforce who are competent and empowered to create safe environments, recognise safeguarding concerns and risks, and take appropriate action when an issue arises Budget and resource requirements are identified and made available to deliver the workforce development plan Staff with specific strategic and operational responsibility for safeguarding undertake regular continuing professional development training in the safeguarding of children and adults at risk, approved by their respective League, and maintain a record thereof	A needs analysis and training plan should be developed over the next 6 months. Training should include as a minimum, an understanding of legislation and football regulations regarding safeguarding, recognising indicators and signs of abuse.	Induction programmes for all new Ongoing safeguarding training is offered and delivered	DSO	ONGOING
			Implement new Workforce Development Plan - training plan should include all departments across the Club including:	DSO	V1 Oct 25 V2 Dec 25
		The club communicates changes to safeguarding and related policies and procedures to relevant stakeholders, for example: through education, staff briefings, email correspondence and team meetings	• Training Needs Analysis • cascaded out to all staff across the Club • seek out training opportunities for all staff across the Club. • future NL training	DSO	ONGOING By 31/12/25
		The safeguarding workforce development plan exceeds basic requirements and includes education over and above The FA's Safeguarding and Children Workshop			ONGOING

4.3	Children and adults at risk are informed about their rights to protection from abuse, exploitation and mistreatment and are empowered to report concerns The club empowers and educates children and adults at risk about their rights, safety and welfare in physical and online environments, eg: education, activity resources, handbooks, induction processes, parent's evenings and activity briefing sessions. Budget and resource requirements are identified and made available	Internal and external routes for raising concerns, making complaints, seeking support and advice are widely promoted to children, adults at risk and their parents/carers Children and adults at risk demonstrate an awareness of their rights to be safe and heard Staff, children, adults at risk and their parents/ carers demonstrate a sound awareness of and confidence in the club's safeguarding procedures	All policies on the website including: • Whistleblowing Policy • Managing Allegations Policy • Complaints Policy Highlight in induction events – annually each season Quarterly safeguarding update to parents, coach, and players Ad-hoc communication as required using SPOND New budget to be in place each year	MDSO DSO/ SSM DSO DSO/ AM /MDSO CEO	DONE DONE DONE Sept 2025 31 Dec 25 31 Mar 26 etc Ongoing Done 9/25
4.4	Safeguarding, complaints and whistleblowing policies and procedures are accessible and widely promoted.		Website page CEO updates CUSG meetings MDT meetings	DSO	Ongoing
4.5	Senior staff are kept up-to-date with changes in statutory requirements and new, evidence-based ways of working. There is an easily accessible section on the club's website which includes: a clear statement of the club's commitment to safeguarding, the name and contact details of staff who hold specific operational responsibility for safeguarding, and a copy of its safeguarding policies and procedures	Safeguarding and related policies and procedures are widely promoted and easily accessible, for example: intranet, shared drive, induction materials, handbooks, activity literature, pocket/quick reference guide and education resources The role and contact details of staff who hold specific operational responsibility for safeguarding is made known to staff, partners, children, adults at risk and their parents/carers in any handbook or the like produced to accompany any activity.	Quarterly safeguarding update to parents, coach, and players (as above) Policies held centrally on Teams Safeguarding contacts are on website Safeguarding section on the website Key policies on the website Clear statement of the club's commitment to safeguarding	DSO DSO MDSO DSO DSO DSO	DONE ONGOING DONE DONE DONE

STANDARD 5 – PROTECTION - There are effective measures in place for responding to safeguarding concerns and allegation					
Ref	Standard	Issue	Action	Responsibility	Status
5.1	The Club has effective policies and systems in place to manage concerns and complaints as well as compliments from service users or other professionals There are robust and widely promoted policies and procedures for reporting and responding to all types of concern	Standalone Complaints policy to be amended so that it includes the different stages of the complaint, including timelines.	Details available on Club charter	CEO	DONE
		Have effective procedures for responding to concerns about the safety and welfare of children and adults at risk, allegations and low-level concerns; Have safeguarding recording standards; and have complaints and whistleblowing procedures Ensure standalone complaints policy is available for all to access on the Club website.	Details available on official website - Complaints Policy - Safeguarding Policy - Equality Policy - Whistleblowing Policy - Managing Allegations (allegations form) - Low Level Complaints	DSO	DONE
5.2	There is an effective electronic case management system for recording and tracking safeguarding concerns and allegations	Clubs are required to have an electronic safeguarding concern management system which as a minimum:– • allows direct recording/reporting by staff;– alerts safeguarding staff immediately as concerns are reported; • is compliant with data protection requirements and enables restricted access • has functionality to assign and monitor actions; and–has functionality to capture data to support analysis of trends. • have a single system approach to the recording of all safeguarding, welfare or wellbeing issues have documented thresholds which provide clarity on issues to be recorded on the Club's electronic safeguarding concern management system		Tootoot QAF Section 7	Ongoing
5.3	The Club's response to safeguarding concerns and allegations is robust	Ensure that policies and procedures are consistently implemented. Act in the best interests of, and provide effective protection for, children and adults at risk. Ensure that persons involved in the implementation of safeguarding concern and allegation management procedures have the necessary skills and expertise;	Recruit and retain staff Workforce Development Plan	QAF case review system to implement Board	Q3 2025 Ongoing

STANDARD 5 – PROTECTION - There are effective measures in place for responding to safeguarding concerns and allegation

Ref	Standard	Issue	Action	Responsibility	Status
		Ensure case records demonstrate sound professional judgment, defensible decision-making and how the voices/views of children and adults at risk have been considered; - consult with, and where necessary, make referrals to statutory agencies; - consult with, and where necessary, make referrals to The FA and EFL in accordance with FA regulations and EFL regulation 120 - implement measures to identify and implement learning; and - ensure the Board receives regular anonymised information about safeguarding concerns, allegations, risks and themes/trends	Initial assessment SSM review and SWG review QAF case reviews Build relations with NL, FA and LADO Implement Managing Concerns Policy QAF case reviews Weekly updates to LG New board reports quarterly from Nov 2025	DSO DSO DSO CEO	Ongoing Ongoing Ongoing Ongoing Nov 25
5.4	There are written policies and procedures for managing safeguarding concerns and allegations against staff - Policies and procedures for managing safeguarding concerns and allegations against staff are consistently implemented and regularly reviewed - Processes and decisions are child/adult at risk-centered and outcome-focused - There is an impartial investigation process for dealing with safeguarding concerns - Records demonstrate that all concerns are taken seriously and dealt with appropriately - Support is available for individuals reporting concerns, those affected by safeguarding concerns, and where appropriate, those finding	External routes and contacts are promoted alongside formal internal procedures All concerns and reports are taken seriously and acted upon appropriately Staff demonstrate a sound awareness of and confidence in the club's grievance and whistleblowing procedures Children, adults at risk and their parents/carers demonstrate a sound awareness of and confidence in the club's procedures for raising concerns and complaints	Complaints Policy in place on website - Bullying and Harassment Policy in place - Grievance and Disciplinary Policy in place (Staff Handbook) - Managing Allegations Policy (pls allegations form) - Low level concerns policy in place (plus low level report form) Current case management system is Tootoot QAF Section 6 - 7	DSO DSO DSO DSO DSO DSO CEO DSO	DONE DONE DONE DONE DONE DONE June 26

STANDARD 5 – PROTECTION - There are effective measures in place for responding to safeguarding concerns and allegation					
Ref	Standard	Issue	Action	Responsibility	Status
	themselves the subject of an allegation		Move to My Concern when current contract ends QAF section 10 HoPC part of Safeguarding care. Referrals to HoPC and signposting to external agencies included in response considerations.	HoPC	ONGOING ONGOING
5.3	The Club has a named senior officer and senior manager(s) with responsibility for ensuring the Club follows these procedures effectively		DSO and SSM contact details are now available on Club Website	CEO	DONE
5.4	All complaints and allegations of abuse are recorded, monitored and available for internal and external audit There is an electronic case management system	There is an effective electronic case management system for recording and tracking concerns and allegations pertaining to the safety and welfare of children and adults at risk - Clear and comprehensive records are kept of all concerns and complaints, details of handling details of any action taken, - decisions reached and how these were reached, as well as any learning outcomes - Records are handled and stored securely in line with relevant legislation	Case Management System – Toot Toot in place: QAF – Section 7	DSO	DONE

STANDARD 6 – WORKING TOGETHER					
Working together underpins the Club's approach to promoting and protecting the rights, safety and wellbeing of children and adults at risk					
Ref	Standard	Issue	Action	Responsibility	Status
6.1	There is a collaborative and cohesive approach to promoting and protecting the rights, safety and wellbeing of children and adults at risk	Implement robust interdisciplinary approaches to identifying and mitigating safeguarding risks; - implement robust interdisciplinary approaches (including safeguarding expertise) to identifying; meeting and monitoring the needs of children and adults at risk engaged in Club activities (including with the first team), for example, additional needs and vulnerability, behaviour, mental health and wellbeing to enable the early identification of needs/concerns and to provide effective support and protection; - ensure that safeguarding is embedded in player loan and transition processes; - have clear and effective safeguarding governance arrangements and a contractual agreement in place between the Club and its affiliated Club Community Organisation	MDT AMT TB have Safeguarding on agenda	DSO	Ongoing
			SWG is multi-disciplinary and has external input	DSO	Ongoing
			Player loan policy	DSO	Done
			SLA contains Safeguarding obligations	CEO	Done
6.2	There are effective safeguarding due diligence and quality assurance measures embedded in partnerships, commissioned services and affiliated activities that involve attendance by, or participation of, children and/or adults at risk	Implement effective safeguarding due diligence measures to assess the adequacy of prospective partner safeguarding and safer recruitment procedures and practises; - ensure that contractual agreements have robust safeguarding clauses, including consequences where safeguarding obligations are not met; - ensure there is clarity on which policies and procedures must be followed; - ensure that partners and service providers are trained in the procedures they are required to adhere to; - implement quality assurance measures to ensure compliance; - ensure appropriate action is taken where safeguarding obligations are not met	Applies to COO only See 6.1 Implement in new deals JW catering renewal	CEO	Q2 2026

6.3	Working together underpins the work undertaken to promote and protect the safety and welfare of children and adults at risk Safeguarding is actively promoted and embedded within all partnerships and commissioned services Work with multi-agency partners in relation to child protection as detailed in government documents Keeping Children Safe in Education and Working Together.	There is a multidisciplinary approach to promoting and protecting the safety, welfare and wellbeing of children and adults at risk - Safeguarding is a key consideration during activity planning, delivery and reviews - Safeguarding policies and expectations are communicated to partners, third parties and suppliers - The club assesses partner, third party, consultant and supplier suitability, and the adequacy of their safeguarding and safer recruitment policies and practices - There is evidence of effective information and working together to assess and mitigate risk, and to protect the safety and welfare of children and adults at risk - Contractual agreements clearly outline respective safeguarding responsibilities - Partners, third parties and suppliers are trained in the club's safeguarding policies and practices • There are quality assurance measures in place to assess safeguarding practice and consistency in delivery	MDT meeting and minutes to cover Safeguarding and MH	DSO AM	ONGOING
			Active promotion: - Posters - SPOND - Promote to CUSG fan groups i	DSO DSO CEO	ONGOING
			SLA with CCO QAF section 10	CEO	DONE
			QAF section 11	CEO	31/12/25
6.4	Ensure information on children and their family, which is of a personal and sensitive nature, is accurate, up to date and kept confidential in line with GDPR regulations	To Check with the Web filtering company for Club and academy, if they produce reports for the misuse of the internet, as discussed on the day of the visit.	GDPR Policy in place in Club Charter	FD	DONE
			Secure system for medical records QAF – Section 7	Head Physio	DONE
6.5	There is a culture that promotes listening and respecting views and wishes.security of personal records in line with GDPR regulations	To include in the Data Protection Policy reference to GDPR	Date Protection Policy reflects new GDPR regulations.	FD	DONE
			Finance Director is the GDPR nominated lead Listening culture steps adopted: Voice of Player QAF – Section 9	HoPC	Ongoing

STANDARD 7 – LISTENING CULTURE There is a culture that promotes listening to and acting on the experiences and views of stakeholders to drive continual improvement					
Ref	Standard	Issue	Action	Responsibility	Status
7.1	The Club proactively seeks feedback from stakeholders on a regular basis to strengthen its safeguarding arrangements The club facilitates proactive ways for staff and relevant stakeholders to express their views, participate in decision making and raise concerns	Provide a range of safe and inclusive opportunities for staff and relevant stakeholders to form and express their views and share concerns; Demonstrate that the views and concerns of staff and relevant stakeholders are acted upon, as appropriate; Ensure that staff and relevant stakeholders receive feedback in a timely manner; and Provide opportunities for staff and relevant stakeholders to participate in the review and evaluation of consultation measures	Implement QAF Section 9 Action feedback mechanisms: • obtain parent feedback (six monthly) • obtain staff feedback (annually) • [Player meetings quarterly }	DSO Nov 25 May 26 HoPC	Ongoing Ongoing
7.2	There is a culture of listening to children and adults at risk and taking account of their wishes and feelings, both in individual decisions and the development and review of policies and practices The club facilitates proactive ways for children and adults at risk to express their views, participate in decision-making and raise concerns	Implement a systematic approach to understanding whether children and adults at risk feel safe and identifying barriers which may increase vulnerability and prevent them from speaking out. This includes supporting staff to be curious about possible needs being communicated through behaviour; • ensure staff understand children's right to participate meaningfully in decisions that affect them, and what this means in practice; • provide a range of safe, inclusive and age-appropriate opportunities to form and express views and share concerns; • demonstrate that the views and concerns of children and adults at risk are acted upon, as appropriate; • ensure age-appropriate and accessible feedback is provided in a timely manner; provide opportunities to participate in the review and evaluation of consultation measures	Implement QAF Section 9	DSO	Ongoing



Document version	251110 Safeguarding Strategic plan 2526 v3.1	
Preparation date	Updated version Nov 2025	CEO
1921 Board approval	November 2025	
Safeguarding Strategic Plan 3 year plan to 30 June 2028		
Next review	By 30 June 2026	1921 Board
Signed		Nigel Clibbens Chief Executive