



Shots in the Community Foundation Safeguarding Policy

Message from the Board of Trustees

Shots in the Community Foundation (SitCF) is committed to safeguarding the welfare of children and Adults at Risk. SitCF expects all staff, players, volunteers, beneficiaries, stakeholders and guests to share this commitment.

SitCF believe that all staff, players, volunteers, beneficiaries, stakeholders and guests have a responsibility to report any concerns to the SitCF should they be concerned about the welfare of any child or adult at Risk.

The Board of Trustees assumes ultimate responsibility for safeguarding within the charity, and maintains and oversees its policies, procedures, investigations, and complaints.



Aims of this policy

- To safeguard all children, young people, and vulnerable adults who interact with the foundation.
- To demonstrate best practice around safeguarding.
- To ensure that all children and adults can access and partake in sport without being subject to abuse, exploitation, and poor practice.
- To provide guidance for beneficiaries and stakeholders to understand reporting procedures.
- To ensure that coaches, parents and other adults who encounter children and young people provide good role models of behaviour.
- To promote high ethical standards throughout SitCF.



This policy and procedures are informed by the following legislation and statutory guidance:

- Children Act 1989 & 2004
- Care Act 2014 (safeguarding adults)
- Working Together to Safeguard Children 2023
- Keeping Children Safe in Education 2024 (2025 version in force from Sept 2025)
- Safeguarding Vulnerable Groups Act 2006 and DBS guidance
- Prevent Duty Guidance for England & Wales (2023)
- Information Sharing: Advice for practitioners (DfE 2024)
- Equality Act 2010
- NSPCC Child Protection in Sport Unit guidance (latest version)

SitCF also follows FA and Premier League safeguarding frameworks.

Different types of abuse

Child abuse involves acts of commission and omission, which results in harm to the child. The four main types of abuse are:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

Bullying (including cyberbullying), domestic abuse, substance misuse, exposure to violence and other adverse childhood experiences are also recognised as significant safeguarding concerns.

Adults at Risk are defined as anyone aged 18 or over who has needs for care and support, is experiencing (or at risk of) abuse or neglect, and is unable to protect themselves.

Definitions of Poor Practice and Abuse

Poor Practice is unacceptable and will be treated seriously with appropriate action. Any behaviour that contravenes existing Codes of Conduct, infringes an individual's rights and/or reflects a failure to fulfil the highest standards of care is an indication of Poor Practice. A child or young person may not be aware that poor practice or abusive is taking place, as they may deem the behaviour as acceptable.

What is abuse?

Abuse is any form of physical, emotional or sexual mistreatment or lack of care that leads to injury or harm. It commonly occurs within a relationship of trust or responsibility and represents an abuse of power or a breach of trust. Abuse can happen to a child or a vulnerable adult regardless of their age, gender, race, ability, culture or sexual orientation.

Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Physical abuse can be caused through an act or omission.



Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to engage in sexual activity, regardless of 'implied consent.' This includes penetrative (penetration of vagina, anus & mouth) and non-penetrative acts (touching – over or under clothing, any part of the body in a sexual way).

Sexual abuse includes involving children in the watching of sexual acts, and encouraging children to engage in over-sexualised behaviour, and also grooming offences which can also be committed via the internet.

Sexual abuse can be perpetrated by anyone, including a parent or guardian, caregiver, extended family, friend, neighbour, stranger or a person in a position of trust (includes 16/17 year olds).

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development, including verbal attacks on a child's sense of self, repeated humiliation or rejection. Exposure to violence, drugs, alcohol abuse or severe conflict in the home, forced isolation, restraint or causing a child to be afraid much of the time may also cause emotional harm. Emotional abuse rarely happens only once and it is usually part of a pattern of how the child is being treated over a significant period of time.

Neglect

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. This includes failing to provide adequate nutrition, clothing, shelter, health care and protection from harm. Emotional neglect is the failure to meet the child's ongoing emotional needs for affection and a sense of belonging.

Other types of abuse

Bullying/ Cyberbullying (strand of emotional abuse)

Bullying may be defined as deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for those bullied to defend themselves. It can take many forms, but the three main types are physical, verbal and emotional, both face to face and via social media and other online forums. The damage inflicted by bullying can frequently be underestimated. It can cause considerable distress to children to the extent that it affects their health and development or, at the extreme, cause them significant harm (including self-harm and suicide). All settings in which children are provided with services or are living away from home should have in place rigorously enforced anti-bullying strategies.

The Club have a specific anti-bullying policy in place to address concerns of bullying. This includes recording and reporting all incidents of bullying.

This is when a person uses technology i.e. mobile phones or the internet (social networking sites, chat rooms, instant messenger, tweets), to deliberately upset someone. Bullies often feel anonymous from the incident when it takes place online and 'bystanders' can easily become bullies themselves by forwarding the information on.

Domestic Abuse

Domestic Abuse is a significant indicator of risk of harm to children, whom may suffer directly or indirectly if they live in households where there is domestic abuse. Domestic abuse is likely to have a damaging effect on the health and development of children.



Safeguarding and mental health

Not all people who experience mental health problems will be classed as an adult at risk. This may be because they do not receive care or support for their mental health problem, or they receive care or support for their mental health problem but aren't experiencing, or at risk of, abuse or neglect.

However, there are people who experience mental health problems who have care or support needs, experience abuse or neglect and are unable to protect themselves. They are classed as adults at risk. SitCF has a duty to care for the welfare and wellbeing of adults with care and support needs, and to safeguard them from abuse or neglect.

Signs and Symptoms

The list below is not exhaustive and the presence of one or more of these indicators is not proof that abuse is taking place though they are indicators that abuse may have taken place:

- Unexplained or suspicious injuries such as bruising, cuts or burns, particularly if on a part of the body not normally prone to such injuries.
- An injury for which the explanation seems inconsistent.
- Disclosure of what appears to be an abusive act.
- Disclosure of unsatisfactory home circumstances i.e. Domestic abuse, drugs and alcohol misuse, mental health concerns of a parent or other person within the home.
- Someone expresses concern about the welfare of the child.
- Unexplained changes in behaviour (e.g. becoming quiet, withdrawn or sudden outbursts).
- Over sexualised behaviour
- Displays variations in eating patterns including overeating or loss of appetite.
- Weight loss for no apparent reason.
- Becomes increasingly dirty or unkempt.
- Evasive parents/carers

Designated Safeguarding Officers (DSOs)

Should you have any concerns that a child or vulnerable adult may be the victim of any form of abuse you must ensure that the foundation DSO is notified at the earliest opportunity.

If the matter is of a sexual nature or urgent and DSO is unavailable, please contact the local police.

SitCF Designated Safeguarding Trustee (DST) – Kay Khan (kay.khan@shotsfoundation.org)

SitCF Designated Safeguarding Officer – Jamie MacAllister
(jamie.macallister@shotsfoundation.org)

Aldershot Town Football Club Safeguarding Officer – Louis Fell (louis.fell@theshots.co.uk)

Aldershot Town Academy Safeguarding Officer – Richard Anderson
(richard.anderson@theshots.co.uk)

Contact details will be updated annually in line with the policy.

Safeguarding training

A safeguarding induction will be provided to all new staff. If this is not offered to you, please make contact with Jamie MacAllister (contact details shown above). Key elements of SitCF safeguarding policy are discussed in more detail and specifically to the individuals' role.

All staff working in direct contact with children are required to complete the FA's 3-hour Safeguarding Children Awareness workshop and undertake a refresher course, at least once every 3 years. Details



of those satisfactorily completing this course are retained by SitCF in line with its GDPR. Staff whose roles involve working with adults at risk will also complete relevant Safeguarding Adults Training.

Staff will also receive guidance and instructions on safeguarding as part of the wider initial induction into SitCF.

Recruitment and staff responsibilities

All staff will undertake a specific safeguarding and safer working practices induction upon employment. A briefing document and guidance for safer working practices will be provided. There is an expectation that staff will read the guidance and sign a declaration of agreement and understanding. Key elements of the SitCF Safeguarding Children Policy are discussed in more detail if the role requires it.

All staff working in direct contact with Children are required to complete the FA 3-hour Safeguarding Children Awareness workshop and undertake a refresher course every 3 years. Details of this will be retained by the DSO.

All staff or volunteers in a position of trust, and in roles that require contact with adults at risk, young people and children will undergo enhanced DBS check, which is an on-going procedure throughout the association with the foundation.

Staff and volunteers will familiarise themselves with the staff and volunteer code of conduct which will provide further, detailed guidance on the safer working practices of working with children and vulnerable adults. This may include guidance further training, acceptable IT use and online behaviour.

Low-Level Concerns (LLC)

In line with *KCSIE 2024/25*, SitCF maintains a system for reporting and managing low-level concerns. These are behaviours towards children or adults that do not meet the threshold of harm but may indicate a breach of the staff code of conduct or cause unease.

- All LLC must be reported to the DSO.
- The DSO will log, review and (where appropriate) escalate to senior management.
- This system is intended to promote a transparent culture where all concerns are addressed.

Service Level Agreements

SitCF's commitment to safeguarding is outlined in any partnership agreements, service level agreements or any other agreements that are in place with any service provider or for commissioned services insofar as those services relate to children and vulnerable adults.

SitCF will only partner with organisations that have compliant safeguarding policies and procedures.

Beneficiaries and stakeholders

Whilst SitCF will strive towards safeguarding our beneficiaries and stakeholders, we expect our beneficiaries and stakeholders to adhere to our safeguarding policies and procedures. Any beneficiaries and stakeholders working with children or vulnerable adults will be subject to a suitability test, which will include the verification of relevant checks (including DBS). Failure to do adhere to our safeguarding policies and procedures will result in beneficiaries and stakeholders not being able to work alongside SitCF in its events and initiatives.



All beneficiaries and stakeholders will have access to our safeguarding policy, and the ability to raise any questions and concerns to the designated Trustee or DSO. Where appropriate, beneficiaries and stakeholders will receive risk assessments.

Confidentiality

SitCF will work to maintain and secure one's confidentiality. However, when necessary, SitCF may break confidentiality, this includes but is not limited to, if someone is in immediate danger, if they are planning to take action that will put others at risk, if the issue at hand concerns a child.

SitCF will treat confidentiality with the upmost seriousness and any decisions will be made in line with its General Data Protection Regulation (GDPR) policies and procedures.

Remember that: It is not the responsibility of staff (permanent or casual) or volunteers to decide if abuse has taken place, but it is their responsibility to act on any concerns, in accordance with this procedure.

Responding to Allegations or Suspicions

All staff, volunteers and players have a responsibility to ensure the safety and welfare of children and to take appropriate steps to ensure that suspicions and allegations of abuse are taken seriously and responded to quickly and appropriately. It is not the responsibility of anyone within SitCF to decide whether or not child abuse has taken place. You MUST however, listen to the child and reassure them. Inform the DSO at the earliest opportunity.

Where there is a complaint against a member of staff the one of the following may occur:

- A criminal investigation led by the Police.
- A child protection investigation led in a multi-agency approach by the Local Authority
- A disciplinary or misconduct investigation led by SitCF, which may also involve The Football Association or Premier League.
- The foundation will delay an internal disciplinary or misconduct investigation while a criminal or local authority investigation takes place.

If a member of staff suspects abuse is taking place, or a report/allegation of abuse has been disclosed to them, where possible the DSO should be contacted as early as possible. However, it is recognised that an individual may need to respond to a situation immediately and prior to such contact if the nature of the suspicion or report is putting the child concerned in immediate danger.

Staff should:

- Listen carefully rather than question the child directly.
- Stay calm and not offer their personal opinions/thoughts.
- Be aware that medical or criminal evidence may be relevant.
- Tell the child that you are listening and taking what they say extremely seriously.
- Seek medical attention if necessary.
- Take further action – they may be the only person able to prevent future abuse.
- Inform the DSO of the information or another senior member of staff if these are not available.
- Write down everything said (in their words as far as possible) and what was done – accuracy and detail is important. Keep this information stored in a secure place. Concerns can be recorded on the Safeguarding reporting form (template shown below)



If staff or volunteers unwillingly or unknowingly violate SitCF's safeguarding policies and procedures, depending on the severity of the issue, they will undergo further training and a refresher of our policies and procedures, they may undergo disciplinary proceedings.

If staff or volunteers willingly and knowingly violate SitCF's safeguarding policies and procedures, they will be subject to relevant disciplinary proceedings, depending on the severity of the issues, this may include termination of employment and legal action.

Reporting Concerns

All concerns must be reported immediately to the Designated Safeguarding Officer (DSO) or Designated Safeguarding Trustee (DST).

If a child or adult is in immediate danger, dial 999.

If the concern relates to the DSO or senior staff, contact the Hampshire Local Authority Designated Officer (LADO) or:

- Hampshire Safeguarding Children Partnership referral line.
- Hampshire Safeguarding Adults Board referral line.

Concerns can be raised using the Safeguarding Reporting Form, which must be stored securely and in line with GDPR.



Safeguarding Reporting Form

Please complete the form within 24 hours and send direct to the DSO and/or DST.

In line with the Information and Records Management Society (IRMS), all safeguarding reporting forms are kept on file for up to 7 years.

Date of concern:	
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Details of the person who is raising the concern:

Name:	
Role:	
Venue:	
Telephone Number:	
Email:	

Details of the person you are raising a concern about:

Name:	
Role:	
D.O.B:	
Home Address:	
Telephone Number:	
Email:	

Details of the parents/carers (if applicable)

Name:	
Address:	
Telephone Number:	
Email:	



Nature of the concern:

Circumstances (Include ALL of the information known to you:	
Details of any disclosures (Include ALL of the information known to you, including any verbatim comments):	
Injuries Seen:	
Witnesses (include full details, including name, role and contact details):	

Confidentiality

If the allegation is against a member of staff or volunteer, that person should not be informed of the concern until advice has been sought from the DSO and/or DST.

Have the parents/carers been informed of the concern?	
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<p>If not, please state why (If you feel sharing the information with the parent/carer will place the child at risk, you should not share this information. Advice should be sought from the Safeguarding Manager and reasons fully documented.</p> <p>Adults at risk need to be informed of the concern):</p>	
<p>When were the parents/carers informed of the concern:</p>	
<p>Have the parents/carers or adult at risk given consent to share information?</p>	
<p>If not, why?</p>	

Details of the person alleged to have caused harm (if applicable):

<p>Name:</p>	
<p>Role:</p>	
<p>D.O.B:</p>	
<p>Address:</p>	
<p>Telephone Number:</p>	
<p>Email:</p>	
<p>Do they work/volunteer anywhere else?</p>	
<p>If yes, please detail:</p>	

Actions :

<p>What has been done about the concern?</p>	
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Who has been informed about the concern?	
When were they notified?	
What was the name of the person you spoke to?	
What did they say?	
What other actions have been taken?	

If your concern relates to a sexual assault that has taken place within the last 7 days, you must notify the DSO and the Police at the time you are advised.

If your concern relates to the immediate welfare of a child or adult at risk call the police on 999. The DSO or DST should then be notified.

Staff should not:

- Offer to keep any information disclosed confidential. Say there may be occasions where you have to pass the information to the Police or other adults
- Make promises they cannot keep
- Interrogate the child – it is not their job to carry out an investigation.
- Cast doubt on what the child has told them – they shouldn't interrupt or change the subject, or say anything that makes the child feel responsible for the abuse
- Staff should ensure the DSO/DST is informed as soon as possible. They will know how to follow this up and where to go for further advice. The 'reporting safeguarding concern' form should be used to record information and pass to the DSO.

Whistleblowing Policy

Whistleblowing refers to making a protected disclosure under the Public Interest Disclosure Act (1998).

By encouraging a culture of openness, SitCF wants to encourage staff to raise issues, which concern them at work. Staff have a right and duty to raise matters of concern they may have about the services being offered by SitCF or serious malpractice associated with them. Staff may be worried that by reporting such issues they will be opening themselves up to victimisation or detriment or risking their job security. However, all staff are protected by law if they raise concerns in the right way. Provided they are acting in good faith, it does not matter if they are mistaken. This policy is designed to ensure workers raise concerns properly and to ensure that mechanisms exist in ASFC issues raised by staff will be addressed quickly and effectively.

Although this list is not exhaustive, examples of situations in which a disclosure might be made are:

- The committing of a criminal offence.



- Improper conduct or unethical behaviour
- Attempts to conceal any of the above

The individual can contact the NSPCC Whistleblowing Advice Line on 0800 028 0285 if they need to escalate the situation.

Online Safety

SitCF takes its guidance on the use of images from guidelines issued by the FA and Football League.

All images are taken by Aldershot Town FC or SitCF officials who have been briefed by the member of staff (and where possible a DSO) responsible for the activity being photographed / filmed.

Before taking images of Children, parental consent is sought in writing at the start of each football season or prior to the event. Parents/Legal Guardians are responsible for informing the Club/SitCF of any change of circumstances within the season which may affect consent. Parents/Legal Guardians will be informed of how the image will be used. The Club/SitCF will not allow an image to be used for something other than that for which it was initially agreed.

All Children featured in publications will be appropriately dressed. Where possible, the image will focus on the activity taking place and not a specific child. Where appropriate, images represent the broad range of people participating safely in the event. Designated Club photographers will, where applicable, undertake a CRC and attend a Safeguarding Children workshop and in any case will be personally responsible for keeping up to date with the latest guidelines on the Use of Images policies issued by the Club/SitCF and by the Premier League from time to time. Club/SitCF Identification will be worn at all times.

Children who are subject to family, care or legal proceedings, or who are under a court order will not have their images published in any Club/SitCF document. No images of Children featured in Club/SitCF publications will be accompanied by personal details such as their school or home address. Recordings of Children for the purposes of legitimate coaching aids are only filmed by officials and are stored safely and securely at the Club's premises. Any instances of inappropriate images in football should be reported to the media manager and DSO. The Club/SitCF does not put young player profiles with images and personal information on its website.

SitCF recognises the importance of social media and social networking services. However, SitCF are also aware of the potential safeguarding risks in this area. Staff should not add or invite children or young people they have responsibility for to become "friends" or contacts.

SitCF recognises the specific risks posed by online environments, including:

- Grooming and sexual exploitation via social media, gaming, or messaging apps.
- Exposure to harmful content (e.g. extremist, violent or sexual material).
- Cyberbullying and peer-on-peer abuse.
- Sextortion or exploitation through image-sharing.

All staff and volunteers must:

- Complete online safety awareness training.
- Adhere to SitCF's Social Media Policy.
- Never add, "friend," or privately message children or young people they are responsible for.
- Report any online safeguarding concerns immediately to the DSO.

Concerns around radicalisation and extremism

The Counter terrorism and Security act places a duty on specified authorities, including sport in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism (the prevent duty) There is also a duty on local authorities to ensure there is a Channel



Panel in place. This must include the local authority and senior police officers. The panel will assess to what extent identified individuals are vulnerable to being drawn into terrorism. The Act requires partners of the Channel Panel to cooperate with the panel in the carrying out of its functions and the police in undertaking the initial assessment as to whether a referral is appropriate. There will be training rolled out in this area so that staff across the Trust and Academy are aware of signs to be aware of and referral pathways. Liaise with the DSO if there are any concerns about this.

Activities for Disabled Persons

SitCF recognises that children, young people, and adults with disabilities may face additional safeguarding challenges. Research and statutory guidance show that disabled persons are at increased risk of abuse and neglect and may be less likely to disclose concerns due to barriers in communication, dependency on carers, or fear of losing support.

Our Commitments

- **Equal Access** - All activities will be inclusive and adapted where necessary to ensure disabled persons can participate safely and fully.
- **Reasonable Adjustments** - SitCF will make reasonable adjustments to remove barriers, including physical access, communication methods, and support requirements.
- **Increased Vigilance** - Staff and volunteers will be alert to additional risk indicators such as dependency on adults, isolation, lack of advocacy, or communication difficulties.
- **Accessible Safeguarding Information** - Safeguarding reporting processes will be made accessible, for example through easy-read formats, use of pictorial guides, or interpreters where appropriate.

Equality, Diversity, and Inclusion

SitCF is committed to promoting equality, diversity, and inclusion in all aspects of our safeguarding policy. We believe in creating a safe and inclusive environment where all children, young people and adults are treated with respect and dignity, regardless of their age, gender, race, religion, sexual orientation, or disability.

We strive to ensure that our safeguarding practices are fair, transparent, and accessible to all, and that everyone has the right to be heard and protected from harm. If you have any concerns over the treatment of a child, young people or adult that appears to be on the grounds of their age, gender, race, religion, sexual orientation, or disability, please contact the relevant DSO and/or DST.

The FA Report Discrimination free phone number is 0800 058 0508 to report allegations of discrimination such as sexist, racist and homophobic abuse as well as abuse in relation to disability.

Monitoring

The policy will be reviewed yearly, or in the following circumstances:

- Following a recommendation within a serious case review and/or from the LSCB or any other regulatory body.
- Amendments to existing legislation, introduction of new legislation and/or government guidance.
- As a result of any other significant change or event.

SitCF will use its safeguarding plans to monitor and evaluate any changes to the safeguarding policies and procedures, any staff training, board meetings where appropriate.



Key contacts and useful numbers/websites

Shots in the Community Foundation DST Kay Khan – kay.khan@shotsfoundation.org

Shots in the Community Foundation DSO Jamie MacAllister – jamie.macallister@shotsfoundation.org

Aldershot Town FC DSO Louis Fell – louis.fell@theshots.co.uk

Aldershot Town Academy DSO Richard Anderson – richard.anderson@theshots.co.uk

<http://www.thefa.com/football-rules-governance/safeguarding>

The FA Report Discrimination free phone number is 0800 058 0508 to report allegations of discrimination such as sexist, racist and homophobic abuse as well as abuse in relation to disability. This number is dealt with by FA staff in London although allegations can be passed back to a County FA or other organisation to deal with. There is also an email address:

reportdiscrimination@TheFA.com which can be used as an alternative to the phone number.

For emergencies - 999

For non-emergencies - 101

NSPCC Helpline - 0808 800 5000

NSPCC Whisteblowing Advice Line - 0800 028 0285

Childline - 0800 1111