



Manchester City Football Club Safeguarding Policy (UK)



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FOREWORD

Manchester City Football Club and City Football Group are fully committed to promoting and protecting the individual rights, safety, dignity and wellbeing of the many individuals and communities we come in to contact with; it is fundamental to our operation that we provide a positive experience, particularly for children and Adults at Risk.

SafeAtCity is our safeguarding programme designed to help protect from abuse, harassment, bullying and neglect, and to ensure everyone who is involved with Manchester City activity has a safe and welcoming experience.

Everyone who has contact with children, young people and Adults at Risk has a responsibility for creating a positive environment in which people are protected from harm whilst they take part.

This 'SafeAtCity' policy provides a clear set of operating standards that our employees, workers, volunteers, contractors and participants apply during all our activities, alongside providing information about different types of abuse, advice on identifying concerns, and guidance and procedures for use by those involved in delivering activities related to Manchester City.

Our SafeAtCity programme demonstrates our commitment to safeguarding risk management in sport.

Ferran Soriano

Chief Executive Officer

City Football Group



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1. PURPOSE AND AIMS

1.1 The purpose of this policy is to inform all stakeholders of Manchester City's (the "Club", "our", "we") safeguarding-related requirements and processes. It also presents our safeguarding standards and expectations to help make sure that every child and 'Adult at Risk'¹ is safe and protected from harm, resulting from abuse, exploitation, harassment, or neglect.² Individuals who are within the legal definitions of child or Adult at Risk are within the scope of this policy (For the purposes of this policy, the definition of an Adult at Risk aligns with Section 42 of the Care Act 2014).

Other Vulnerable People

1.2 Manchester City also recognises that vulnerability to abuse, exploitation, maltreatment and neglect may also negatively impact individuals who are not within the traditional scope of a safeguarding framework. Any person in our activities could experience 'fluctuating' levels of vulnerability that result from situational or contextual circumstances. As such, we are extending our safeguarding obligations to all our stakeholders and thus, the additional purpose of this policy is to set out the scope to those 'other vulnerable people'. This concept reflects the principle of situational vulnerability, recognised in safeguarding practice and guidance issued by the NSPCC Child Protection in Sport Unit and Sport England.

Proactive & protective

1.3 This policy directs the safeguarding framework, known as SafeAtCity, an extensive programme of work that is the Club's response to the safeguarding risks identified on the organisational risk register. The SafeAtCity framework aims to prevent harm (or risk of harm) to any individuals we are in contact with. As such, this policy contains proactive and protective measures to mitigate safeguarding risks that individuals could be exposed to. Manchester City will undertake regular safeguarding risk assessments (SafeAtCity visits) across programmes, events and operational environments to identify, monitor and mitigate safeguarding risks. Section 11 identifies other organisational policies which combine with the Safeguarding Policy to govern our business operations.

Responding to safeguarding concerns

1.4 The policy also presents the responsive processes for managing any safeguarding concerns that arise via our reporting channel. Central to this element of the policy is a philosophy that 'it could happen here' and that we must respond swiftly and effectively to any concerns, taking action where appropriate, and making defensible decisions which withstand retrospective scrutiny.

1.5 We will also take seriously any concerns reported to us that may fall outside the scope of our jurisdiction but are reported to (or observed by) us during our activity - such as a

¹ See Appendix 7 for definition of terms.

² See Appendix 3 for definitions of types of abuse.



concern reported to us by a child relating to their maltreatment at home or school and/or by someone.

2. SCOPE

2.1 This policy applies to all individuals involved in managing, delivering, or engaging with Manchester City activity in all its formats and settings, including our employees, participants, parents and carers, and third parties, including commercial partners, license holders, contractors, consultants and grantees.

2.2 The policy applies to Manchester City workers³ and participants wherever they are deployed across the world, though recognise that there will be differing legal and regulatory conditions in non-UK territories which may impact some of the policy obligations. Where Manchester City activities operate outside the UK, the Club will comply with:

- applicable local safeguarding legislation and regulation, and
- internationally recognised safeguarding standards including the International Safeguards for Children in Sport (2016).

2.3 This policy also applies to all individuals employed or deployed by City Football Group Limited (CFG) where their work brings them into contact with Manchester City. CFG is a British-based holding company that administers association football clubs, including Manchester City, and shares its headquarters with Manchester City. The policy scope also includes City in the Community – Manchester City's charity.

2.4 For the purposes of this policy – where reference is made to Manchester City, it should be assumed that this means Manchester City **and** CFG.

2.5 Where Manchester City enters into a commercial or contractual relationship with third parties, including commercial partners, licence holders, contractors, consultants and grantees, those organisations and individuals must comply with the safeguarding standards contained in this policy. The Club may require evidence of such compliance through contractual safeguarding clauses, due diligence checks, monitoring arrangements and adherence to the Partnerships Safeguarding Manual.

2.6 Some Manchester City facilities share physical spaces with those of our partners and our neighbours. Where reasonable and practical, this policy will be enacted whenever and wherever our activities overlap and safeguarding risks are identified.⁴

2.7 The workforce is required to implement the requirements contained in this policy in conjunction with the Safeguarding Code of Conduct (presented as Appendix 6). This is acknowledged by all workers at the commencement of their employment or deployment.

³ See also 2.3 in relation to CFG workers

⁴ For example the operation of the COOP Live Arena may be concurrent with the operation of the Etihad Stadium



2.8 Members of the workforce are required to consider the safety, dignity and wellbeing of those we owe a duty of care to. A (non-exhaustive) list of potential settings where safeguarding measures are required is presented below.

- i. Academy or associated player development programmes.
- ii. Children taking part in senior / open-age football (eg transitional moments in senior / elite squads)
- iii. Trips, tours, overnight stays or living for significant periods of time away from their families in Club-arranged accommodation or residential provision.
- iv. Commercial pay-to-play programmes or similar.
- v. City in the Community activities including ability / disability programmes, considered 'homeless' people, people with mental health or health issues, or young offenders taking part in community foundation-based programmes.
- vi. Contacting the club, visiting the stadiums on match days, or visiting for other pre-arranged activities e.g. events, concerts or tours.
- vii. Attending promotional or marketing events either on on-site or off-site locations, including those operated by a third party on behalf of Manchester City.
- viii. Ball assistants, match-day mascots, flag-bearers and other children and young people taking part in match day activities.
- ix. Children and young people attending as volunteers or on organised work experience.
- x. Involved or in contact with our eSports programme.
- xi. Fans, supporters or anyone in contact with our digital footprint and two-way communication channels (eg website, social media and Supporter Services).

3. GENERAL PRINCIPLES

- 3.1 Manchester City is a member of City Football Group (CFG). This means that this policy is aligned with the CFG Group Safeguarding Policy and adopts many of its principles whilst ensuring that local regulation is applied in the relevant settings.
- 3.2 Safeguarding practice is at the heart of all our work with children and Adults at Risk.⁵ We have a responsibility to safeguard and promote the welfare of children, Adults at Risk, and other vulnerable people and to protect them from abuse or the risk of abuse, exploitation, harassment, maltreatment or neglect.
- 3.3 We must all be vigilant and be ready at any time to respond to a concern of abuse, maltreatment, poor practice or a wellbeing issue (including mental health concerns).
- 3.4 Anyone can report a safeguarding-related concern. The Club will ensure that there are a range of methods for raising concerns and that making such a report is made as simple as possible. Anonymous concerns may be received and will be taken seriously, however these may be more difficult to respond to formally.

⁵ Please see section 4 of this policy for all definitions of terms.



- 3.5 We will always try to consult with children and Adults at Risk and, where appropriate, their parents or legal guardians, in order to understand their needs, wishes and concerns so that these may help shape Manchester City policy, procedure, and practice.
- 3.6 The legislation and guidance relevant to this safeguarding policy includes the following: Children Act 1989 and 2004, Children and Social Work Act 2017, Working Together to Safeguard Children (2023), Care Act 2014 and associated statutory guidance, Sexual Offences Act 2003, Serious Crime Act 2015, Domestic Abuse Act 2021, Police, Crime, Sentencing and Courts Act 2022, Online Safety Act 2023, Data Protection Act 2018 and UK GDPR, Prevent Duty Guidance (updated 2023), Manchester City Councils Safeguarding Partnership, The Football Association and Premier League rules, NSPCC Child Protection in Sport Unit published guidance and Keeping Children Safe In Education (2024) mandatory guidance .
- 3.7 We will apply Safe Recruitment practices to the recruitment, selection and on-boarding of our workforce. These practices align, where practical, with guidance contained in Keeping Children Safe In Education (2024). As well as in accordance with the local safeguarding policies and procedures set out by Manchester safeguarding Partnership [MSP](#).
- 3.8 The Club will maintain a safeguarding team of experienced practitioners. They are available to offer information, advice, guidance and reporting on safeguarding matters can be contacted via safeatcity@mancity.com.

4. ROLES AND RESPONSIBILITIES

- 4.1 As a member of the CFG portfolio, Manchester City's safeguarding operation is guided by the Group Safeguarding Strategy and Policy and implemented in accordance with local law and regulation.
- 4.2 It is the responsibility of every member of the workforce to ensure that they carry out the requirements of this policy and work at all times in a way that will safeguard and promote the rights, safety, dignity and wellbeing of all children, Adults at Risk other vulnerable people. This includes:
- i. the responsibility to provide a safe environment and be constantly vigilant of where and when this may be compromised;
 - ii. every member of the workforce must apply the principles of safe working practice when delivering activity and must observe personal and professional boundaries at all times when representing the Club; and
 - iii. taking the appropriate steps to ensure any suspicion or allegation of abuse, maltreatment, poor working practice, or neglect is taken seriously and reported appropriately.

The Manchester City workforces general safeguarding responsibilities are supported and guided by several safeguarding roles strategically positioned across the organisation with



ultimate accountability sitting with the CFG General Counsel - our named Senior Safeguarding Lead.

- 4.3 The Club Board retains overall accountability for safeguarding governance and receives regular safeguarding assurance reporting to ensure the effectiveness of safeguarding arrangements across Manchester City operations.
- 4.4 The work of the Manchester City safeguarding team is driven by the support of several strategically placed safeguarding managers who are deployed into areas of the business which present the highest levels of risk.
- 4.5 The Manchester City safeguarding operation is supported by the Group's Director of Safeguarding and the Safeguarding Executive (Global Support), contacted via safeatcity@cityfootball.com.
- 4.6 The Senior Safeguarding Lead at Manchester City is accountable for ensuring the effectiveness of this policy and our compliance with it.
- 4.7 The duties and responsibilities of the Senior Safeguarding Lead, CFG Director of Safeguarding and the MCFC Head of Safeguarding are detailed below. The Head of Safeguarding has the authority to escalate safeguarding concerns directly to relevant statutory agencies where required, in accordance with applicable safeguarding legislation and guidance:
- i. The Club Safeguarding Policy is: approved by Club leadership; in place and reviewed annually; published and made available to the public; and is prepared in accordance with all statutory and regulatory requirements.
 - ii. A senior member of staff is designated to take the lead responsibility for the implementation of the safeguarding strategy.
 - iii. All members of the workforce receive a safeguarding induction and are provided with a copy of this policy and the Safeguarding Code of Conduct.
 - iv. Workers are also required to apply the City Football Code of Conduct which is a general set of behavioural expectations.
 - v. All members of the workforce undertake appropriate safeguarding training relevant to their role.
 - vi. All members of the workforce will have regular reviews of their practice to ensure they maintain up to date knowledge, skills and expertise.
 - vii. Procedures are in place for dealing with allegations against members of the workforce who work with children and/or adults at risk in line with legal obligations and statutory guidance and including protocols for making timely external referrals to statutory or regulatory agencies, including the Designated Officer for the Local Authority (LADO)/ Local authority lead for concerns about a Person in a Position of Trust (PiPoT) and the Disclosure & Barring Service (DBS).
 - viii. Safer recruitment practices are developed and implemented to prevent individuals who may pose a risk to children and adults at risk from having access to children and adults at risk within, or through, the organisation.



- ix. Ensure that members of the workforce are obliged to raise concerns about poor or unsafe or inappropriate practice by others and such concerns are addressed sensitively in accordance with agreed internal procedures.
- x. Where a concern relates to City in the Community, referrals are made within timescale to both the Premier League Charitable Fund and the Charity Commission.

5. TRAINING AND INDUCTION

- 5.1 Individuals joining the workforce at Manchester City are informed of the safeguarding arrangements in place, are given access to a copy of Manchester City's Safeguarding Policy, presented with the Safeguarding Code of Conduct⁶ and given information on the safeguarding team and procedures for reporting concerns. All members of the workforce are expected to read and apply these key documents.
- 5.2 All new members of the workforce will receive safeguarding training during their induction period. This training will vary dependent on the role and interaction with children and Adults at Risk. Those engaged in Regulated Activity-type⁷ roles will also be expected to undertake the FA Safeguarding Children Workshop and renew this every two years⁸ as required under football regulations.
- 5.3 The Safeguarding Code of Conduct is issued to all members of the workforce during their induction. These are basic behavioural requirements of all those involved in the delivery of Manchester City activity. All members of the workforce are expected to carry out their work in accordance with this Code. Failure to do so may lead to disciplinary action.
- 5.4 Safeguarding personnel will receive training across wider areas of the safeguarding landscape, including good practice, e-safety, disability, neglect, domestic abuse, gang culture, substance misuse, exploitation, radicalisation, and human trafficking, modern slavery discriminatory abuse. In turn the safeguarding team will offer support, guidance, and training to members of the workforce who may be faced with issues and concerns through their day-to-day work with children or other vulnerable people.

6. REPORTING & RESPONDING TO CONCERNS

- 6.1 Manchester City adheres to safeguarding procedures that have been set out by MSP Safeguarding Partnership. Manchester City also applies the regulatory safeguarding requirements of the Football Association and the Premier League in relation to the reporting of relevant allegations, complaints, and incidents.
- 6.2 Everyone at Manchester City is advised to maintain an attitude of 'it could happen here' where safeguarding risk is concerned. When concerned about the safety, dignity or wellbeing of a

⁶ As a minimum through the completion of our online safeguarding course. Others not subject to this course will receive the document in person.

⁷ The legal concept of Regulated Activity relates to those who work in regular or frequent or overnight contact with children. The definitions can be found: <https://www.gov.uk/government/publications/new-disclosure-and-barring-services>

⁸ This validity period has reduced to two years from the previous three year period.



child or adult, any member of the workforce should always act in the best interests of the individual and have a responsibility to take action as outlined in this policy (see Appendix 1 - Responding to Concerns flowchart).

- 6.3 All workers are expected to have the ability to recognise potential harm or risk resulting from potential abuse or poor practice and have a duty to share those concerns in accordance with the procedures outlined in this policy. At that point the Management of Safeguarding Concerns & Allegations Policy (UK) is applicable. It is not the responsibility of general members of the workforce to investigate safeguarding or welfare concerns or determine the viability of any disclosure or allegation – dedicated resources will be allocated to these once the concern has been reported.
- 6.4 Members of the workforce **have a duty to report any situation where there is harm or risk of harm to someone, however insignificant that may seem**, or where operational policies have been breached that this potentially exposes someone to harm (see Appendix 3 for full details of types of harm), or exposes operational or reputational risk to Manchester City, including:
- i. the behaviour of an adult (member of the workforce or otherwise) towards a child or Adult at Risk or other vulnerable person;
 - ii. the misconduct of a child or adult towards others (including abuse and bullying by peers);
 - iii. working practices that are contrary to expected standards or practices, and which, left unchecked, have the potential to cause harm;
 - iv. risks identified through recruitment processes (e.g. criminal records information);
 - v. risks identified through other regulated processes – such as Health & Safety or medical requirements;
 - vi. information about an individual provided by statutory agencies or other relevant organisation (such as an allegation or conviction related to an individual’s private life); and
 - vii. concerns about harm to someone that has taken place outside of Manchester City activity (e.g. at home, community or school) but identified within a Manchester City activity.
- 6.5 No matter how insignificant a concern may seem they should be reported. Low level concerns may not seem significant but may indicate a pattern of behaviour before it becomes harmful and steps can be taken to prevent the risk escalating. Manchester City operates a whistleblowing framework that protects individuals who raise safeguarding concerns in good faith. Concerns may be raised through the Club’s Whistleblowing Policy where individuals feel unable to report matters through normal safeguarding channels.
- 6.6 Other stakeholders such as family members, visitors, supporters and members of the public are strongly advised to report concerns they encounter, and in a timely fashion, though we do recognise that they are not under any formal obligation to do so.



- 6.7 Whilst the safeguarding team are available for consultation on any safeguarding related matter, any report of a safeguarding concern can be made using the online webform: <https://www.mancity.com/club/safeguarding/report-a-concern>.
- 6.8 A referral may be justified by a single safeguarding-type incident, such as an injury, a near-miss, poor practice, or disclosure of abuse (see Appendix 6 for support in dealing with disclosures). However, concerns may also accumulate over a period and are evidenced by building up a picture of harm; this is particularly true in cases of emotional abuse and neglect. In all instances it is crucial that all concerns are passed on in accordance with this policy to allow the safeguarding team and the relevant authorities to respond and intervene with support at the earliest opportunity.
- 6.9 All workers are obliged to report incidents or concerns of malpractice where the law, club policy or protocol has been breached by any member of the workforce. Failure to do so may result in disciplinary action.
- 6.10 Manchester City operates a whistleblowing framework that protects individuals who raise safeguarding concerns in good faith. Concerns may be raised through the Club's Whistleblowing Policy where individuals feel unable to report matters through normal safeguarding channels.
- 6.11 Anyone who receives a disclosure of abuse or suspects that a child, or Adult at Risk, is at risk of harm must report it immediately to the safeguarding team. Any member of the safeguarding team can be used as a first point of contact for concerns and queries regarding any safeguarding issue at Manchester City.
- 6.12 Following receipt of any form of safeguarding-related concern, the safeguarding team will consider the information received and decide what action to take in accordance with this policy. All information and actions taken, including the reasons for any decisions made, will be recorded. If the allegations relate to an employee's conduct, the subsequent action will apply both HR disciplinary processes and safeguarding-related requirements and require a collaborative approach to the management of the concern. Please refer to the Management of Safeguarding Concerns & Allegations Policy (UK) for further information.
- 6.13 Where serious concerns are raised and/or a criminal offence may have been committed then the relevant authorities will be informed. Concerns meeting statutory safeguarding thresholds will be referred to the relevant local authority children's or adults' safeguarding teams in accordance with *Working Together to Safeguard Children (2023, updated 2025)* and associated statutory guidance. Where the Police decide that they will not take any further action, the local authority may still proceed with an investigation in conjunction with Manchester City. The initial role of the Safeguarding team is to pass the information on to the relevant person or agency, in an efficient, timely and confidential manner. Where both the Police and social care services have decided to take no further action, Manchester City may undertake an internal investigation and involve relevant internal stakeholders.



- 6.14 In any of the above (serious) circumstances, a Referral Management Group⁹ (“RMG”) should be convened. Where serious concerns are raised, the Senior Safeguarding Lead must be informed at the earliest opportunity as well as a member of the People Services team if the matter relates to a member of the workforce.
- 6.15 If a member of the workforce is removed (or resigns before being removed) from their role as a result of an allegation or investigation conducted under this policy, and the necessary criteria are met, a referral to the Disclosure and Barring Service will be made in conjunction with the appropriate statutory agencies.
- 6.16 The safeguarding team will always respect the right of a child to have their say when a decision that affects them is being taken and will take their views into account. We will act in their best interests when a decision is made, and especially when a child is at risk of harm or may have come to harm. A child’s parent /legal guardian will also be consulted, and consent obtained as a matter of course before any action is taken unless this may put the child at increased risk of harm. Where a parent or legal guardian cannot give consent at a point where it may be required, Manchester City will always act in the best interests of the child as set out in safeguarding procedures.
- 6.17 If an adult who may be at risk of abuse has the capacity to consent, then they must have the opportunity to consent before a decision is made that affects them. Manchester City will assume that an adult has the capacity to consent unless it is established that they lack this capacity.
- 6.18 If at any point there is immediate serious harm, or risk of serious harm, to a child or adult, anybody can refer to emergency services or statutory agencies and should do so as soon as possible. In such circumstances, consent from the individual (or parent/guardian) to act on concerns is not normally required. Anyone deciding to take this course of action must also inform their line manager and Safeguarding team at the earliest opportunity.
- 6.19 Any member of the workforce who does not feel that concerns about a child and or adult at risk have been responded to appropriately and in accordance with the procedures outlined in this policy should raise their concerns with the Senior Safeguarding Lead. Alternatively, members of the workforce can contact a member of the People Services team to raise their concerns. These concerns may potentially be dealt with through the Grievance or Whistleblowing policies. If any member of the workforce does not feel the situation has been addressed appropriately at this point, they should contact the Local Authority Adult's Services or Children’s Services directly with their concerns.
- 6.20 Manchester City also applies the regulatory requirements of the Football Association and Premier League for the reporting of safeguarding concerns where their thresholds are met – these are further detailed in the relevant regulations. Where any concern reaches statutory (Police and child protective services) referral thresholds, the safeguarding team at Manchester City are responsible for referring to the FA and PL within 24 hours.

⁹ Details presented in Appendix 4



6.21 Manchester City recognises that children and adults with special educational needs and disabilities (SEND) can face additional safeguarding challenges. Such matters are included in the training received by our workforce. These additional barriers can include:

- i. assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the adult or child's condition or disability not because of harm because of abusive behaviours by another individual;
- ii. being disproportionately impacted by issues such as bullying without outwardly showing any signs;
- iii. communication barriers and difficulties in overcoming these barriers; and
- iv. close relationships and constant presence of carers.

As such, constant vigilance is encouraged for any workers who are involved with activities where these participants are present.

6.22 We recognise that safeguarding vulnerable people against radicalisation and extremism is vital and within the scope of this policy. At Manchester City we will ensure that:

- i. through training, the workforce understands what radicalisation and extremism is, why we need to be vigilant and how to respond when concerns arise;
- ii. the safeguarding team has received relevant training in this area and will act as the point of contact for any concerns relating to radicalisation and extremism; and
- iii. the safeguarding team will make referrals to Adults and/or Children's Services and will represent our organisation at meetings as required.

1.2. In any instance where the Club and relevant authority disagree and escalation of concerns are required, the safeguarding team will:

- i. contact the line manager in Children's or Adult's Services if they consider that the social care response to a referral has not led to the child/adult being adequately safeguarded and follow this up in writing; and
- ii. use the Local Authority Escalation Policy if this does not resolve the concern.

7. CONTEXTUAL CONSIDERATIONS

7.1 This policy considers a child to be someone who is not yet 18 and as such any emotionally dependent¹⁰, intimate or sexual relationship between a member of the workforce and a child involved in any Manchester City related activity is prohibited and may be subject to:

- i. disciplinary action; and/or
- ii. statutory or criminal referral on the basis of a breach of 'Position of Trust'¹¹ legislation i.e. Local Authority Designated Officer, children's services, and Police;

¹⁰ Except where a parent-child relationship exists.

¹¹ The legal definition of 'Position of Trust' which applies in public/statutory service and not currently in purely sport and leisure settings, can be found here; there may be settings in Club activity where the Position of Trust does apply: <https://www.legislation.gov.uk/ukpga/2003/42/part/1/crossheading/abuse-of-position-of-trust>



and/or

iii. consideration under the FA's Relationship of Trust regulations (see below).

7.2 *Relationship of Trust*¹²

As a result of the roles and authority that most members of our workforce hold, they are considered to be in a Relationship of Trust as provided for in Football Association regulations and in relation to those in their care. This means that those in a position of power and influence over children, young people, or Adults at Risk must not abuse their position for personal advantage or gratification or that of others.

7.3 The Police, Crime, Sentencing and Courts Act 2022 expanded the definition of a Position of Trust within UK law to include certain sports coaching roles. Members of the workforce must therefore be aware that relationships between adults in positions of trust and individuals under 18 may constitute a criminal offence where an abuse of that position occurs.

7.4 Manchester City applies and distributes the best practice guidance from the English Premier League known as "Guidance for Safer Working Practice". Any breach of those guidelines will be treated very seriously and may result in disciplinary action or external referral.

7.5 *Safeguarding elite athletes*

Manchester City draws elite men, women, boys, and girls into its talent development programme. Athletes in the high-performance pathway face additional vulnerability due to their position in sport. Others may seek to gain advantage (financial or otherwise) or gratification from their talent or enhanced profile through unscrupulous means; some may abuse or coerce them just because they can (eg. via social media). The players themselves will experience the constant pressures of being an elite athlete and as such we must be vigilant of the signs and symptoms of issues such as:

- i. abuse by those in positions of power or influence over the athlete;
- ii. poor mental health;
- iii. homesickness; eating disorders;
- iv. addiction;
- v. self-harm: and
- vi. other conditions that may manifest themselves.

The workforce and those of our partners must put the needs of these children first and always remember that anyone who is not yet 18 is a child first, athlete second. Sexual, physical, and emotional maltreatment is never acceptable on any of our programmes.

7.6 *Open-Age Players*

¹² The Regulatory position as provided for with Football Association in England can be found here: <https://www.thefa.com/football-rules-governance/safeguarding/section-1-footballs-safeguarding-framework>



From time to time players who are not yet 18 may either train or play in adult or 'open-age' teams. This may be a temporary or developmental arrangement, or it may be a permanent contractual arrangement. The decision to do this is not taken lightly and will be taken based on the physical and emotional capacity of the player and in conjunction with the players parents. Special consideration will be given to support and monitor the welfare of the players that are placed in these positions and sexual, physical, and emotional maltreatment is never acceptable on any of our programmes. Those responsible for the well-being of such participants will apply the Club's players playing out of age group policy and young players playing in open age checklist

7.7 Residential Accommodation, Children Overseas and from Overseas

Manchester City is, during its activities, required to provide both short- and long-term accommodation for young or vulnerable participants. This may occur in a range of settings and may be arranged by or involve members of the workforce, these include:

- i. trips and tours involving overnight stays for children or other vulnerable players;
- ii. academy players living in club facilities or in domestic settings with approved host families;
- iii. players on trial with Academy teams;
- iv. players on loan with other football clubs;
- v. children and/or other vulnerable people participating in commercial football Programme activities (e.g. City Football Schools);
- vi. children and/or other vulnerable people participating in foundation or charitable Programmes or projects, including 'young leaders' and disability teams;
- vii. commercial activities delivered in partnership with third party operators responsible for the provision of accommodation; and
- viii. partnership activation activities involving children.

7.8 It is vital that wherever such situations arise that the highest level of diligence is undertaken to assess and mitigate risk within the arrangements. Managers must ensure that all applicable legislation, regulation, and good practice is applied to any of the above settings and that any relevant authorities are consulted with throughout the planning and operation of these activities.

7.9 Where a third party is responsible for making and/or managing accommodation arrangements that relate to any of Manchester City related programmes or projects, it is the responsibility of our workforce (eg. the project lead) to ensure that third party operators maintain our expected standards of care.

7.10 All provisions for children and young people to spend time living away from home such as the provision of house parents and tour accommodation will have their own set of policies and procedures. These will include the considerations for safeguarding throughout the provision and the arrangements for all such settings will be guided and supported by the Manchester City safeguarding team.



7.11 *International Considerations*

Manchester City programmes and projects operate across a global footprint and as such the Club also takes an international perspective on safeguarding matters. The Club is committed to ensuring the welfare and protection of participants wherever it operates. Where practical, the workforce, contractors, and licence-holders will apply this safeguarding policy, our safeguarding principles and recognised best practice, to local arrangements. We will also apply, where appropriate, local legislation, regulation and practice and build relationships with those agencies who have local responsibility for children and other vulnerable people.

7.12 *Managing Behaviour*

We want children to enjoy themselves when they are attending our activities. We do however expect children to behave in a way that is appropriate to the individual, age, maturity, and type of activity and in a way that does not harm, endanger or upset others. We understand that some children will also behave in a way that may appear to be outside of social norms and expectations. The Club adopts a positive approach to behaviour management and where necessary develops policies that the workforce must apply. Such policies will recognise the following general principles:

- i. every person is different and as such has individual needs;
- ii. participants should be encouraged to help develop their own codes of conduct or have clear and well communicated guidance on expectations;
- iii. behaviour is usually a reflection of:
 - a. how a person is feeling;
 - b. how their life away from Manchester City activity is making them feel;
 - c. and may also be related to an emotional, intellectual, medical, or physical condition;
- iv. as such, the workforce should recognise that many other factors can affect behaviour – weather and environment, travel and time away from home, nutrition, medical conditions, medication and account for these in any action taken;
- v. challenging, aggressive or violent behaviour presents risks to the individual and others, and physical intervention with any individual displaying such behavior is only ever a last resort in exceptional circumstances – any response must be reasonable and proportionate;
- vi. members of the workforce must review issues of poor conduct and consider the myriad of reasons that there may be for the behavior prior to taking action;
- vii. training will be provided to members of the workforce who may experience serious or significant challenging behaviour;
- viii. physical punishments must never be used by our workforce, though diffusion and de-escalation techniques may when necessary; and
- ix. all significant incidents should be recorded and passed to their Safeguarding Officer (and/or Safety Officer on match days).



7.13 Online and Digital Safeguarding

Manchester City recognises that safeguarding risks increasingly arise through digital environments and online interaction. The Club will take appropriate steps to identify, prevent and respond to online harm involving children, Adults at Risk and other vulnerable participants.

Online safeguarding risks may include, but are not limited to:

- grooming or exploitation through social media or digital communication platforms;
- cyberbullying or online harassment;
- the creation, manipulation or distribution of images of participants, including image-based abuse or the misuse of artificial intelligence technologies; and
- inappropriate direct communication between members of the workforce and participants outside authorised communication channels.

Manchester City will respond to online safeguarding concerns in accordance with this policy and relevant legislation including the Online Safety Act 2023.

7.14 Information and Communication Technology

ICT is used across the Manchester City operations in many and varied ways. The use of ICT will continue to grow and change with new developments in technology and fashion. It is used to communicate across the workforce, as well as with supporters, customers, players, and the media. The Club will:

- i. develop and maintain clear policies on suitable and appropriate use of internet, email, SMS, and social media;
- ii. expect the workforce to only use Manchester City or CFG issued equipment, emails, and software to communicate with participants;
- iii. mandate that in the **very limited circumstances** where closed/encrypted groups (such as WhatsApp) are used, a minimum of two members of the workforce must be members of the group and control and monitoring of online activity is the responsibility of a member of the workforce;
- iv. ensure that consent of parents is obtained if the workforce will use digital means of communication with a child for programme-related reasons;
- v. raise awareness amongst young participants (especially youth academy players) regarding safer internet/social media use in respect of their position as participants, players, role models and future professional players;
- vi. raise awareness, through training and internal communications, with the workforce regarding appropriate use of such media and the importance of both professional and personal online activity;
- vii. have a zero-tolerance approach to 'cyber-bullying' (in line with the Club's anti-bullying policy); and



- viii. respond quickly and appropriately to inappropriate use of the internet and social media by participants, those with parental responsibility and members of the workforce.

8. RECORDS AND INFORMATION SHARING

- 8.1 Manchester City takes the matter of data protection and privacy very seriously and particularly the data collected in respect of children or Adults at Risk. Manchester City complies with the relevant legislation namely the Data Protection Act 2018 (DPA). Personal safeguarding information will be retained in accordance with and applicable data protection requirements and the Safeguarding Privacy Statement¹³.
- 8.2 Where data is collected (in writing or electronically) relating to children, or children are asked for personal details or other information, we will make every effort to obtain consent for its use from those with parental responsibility, unless the child is old enough to provide valid consent in accordance with the DPA. We will seek parental consent if the collection or use of information about a child is likely to result in:
 - i. Disclosure of a child's name and address and other sensitive information to a third party, for example as part of an investigation or the terms and conditions of a competition entry, or partnership activation; and/or
 - ii. Use of a child's contact details for marketing purposes; and/or
 - iii. Publication of a child's image on a website that the public can view; and/
 - iv. The collection of personal data about third parties, for example where a child is asked to provide information about his or her family members or friends
- 8.3 In exceptional circumstances where a child may be at immediate risk of harm it would not be appropriate to seek consent prior to sharing information, if seeking consent from a parent or carer would increase the risk to that individual.
- 8.4 Manchester City will keep a record of all incidents and concerns reported to its Safeguarding team. Any such reports will be taken seriously and carefully recorded, acted upon where appropriate, and confidentially retained. Records will be regularly reviewed to identify patterns of behaviour that may give rise to concern. The Safeguarding team may be required to report or refer these matters to another agency such as the Premier League, Football Association, or local authority.
- 8.5 Any information sharing of safeguarding concerns will be undertaken in accordance with the statutory guidance Information sharing: advice for practitioners providing safeguarding services (May 2024). Manchester City have also published a Safeguarding Privacy Notice which relates to all information processed by the Club in relation to safeguarding-related matters. This can be found here: [MCFC Safeguarding Privacy Notice](https://www.mancity.com/meta/media/pplaq2nw/mcfc-safeguarding-privacy-notice-final-march-2022.pdf).

¹³ <https://www.mancity.com/meta/media/pplaq2nw/mcfc-safeguarding-privacy-notice-final-march-2022.pdf>



- 8.6 We recognise that children aged 13 and over have a right (in law) to make decisions about their own personal data. As such the Club has developed guidance for situations where a child may wish to be consulted on their personal information (for example: if a 'non-resident' parent requests access to it)

9. PHOTOGRAPHY AND VIDEO IMAGERY

- 9.1 Manchester City welcomes photographs and images that celebrate the sport, the values and objectives of the Club, and positive reflections of our operations. We understand however that photography and video imagery and its use can present difficulties, risk, and sensitivity in a range of circumstances.

- 9.2 During our activities it is foreseeable that a child's image may be captured by appointed photographers in digital photographs and in film (see also Consent below). These images may then be used by Manchester City and the wider Group workforce and contractors in both internal and external media and marketing publications and on-line via websites and social media.

9.3 *Video or Photographs as a Coaching or Management Aid*

The recording of training or match footage is a legitimate coaching aid and as such parents and players should be made aware that this is part of the coaching programme. Similarly photographs of matches or players for management purposes (e.g. ID passes or databases) are regularly taken. Both these types may be covered by data protection law. As such all those responsible for the recording of this footage must:

- i. Adhere to this policy
- ii. Take responsibility for the safe storage and distribution of the images
- iii. Give due consideration to the dignity and protection of the players involved
- iv. Inform parents where there are changes to the planned use of the footage which will lead a wider distribution of the images that originally anticipated

9.4 *Consent*

Where an activity may allow for the capture, and thus use of, a participants image, the manager responsible must develop appropriate documentation (forms and guidance) and associated processes to allow for the management of parental consent (or participant consent in respect of an Adult at Risk) and ensure that those individuals understand what they are consenting to and why. Advice when preparing consent or waivers, should be sought from the City Football Group legal department.

9.5 *Opt Out*

Other than on match/event day, individuals have the right to opt-out (i.e. revoke or not give consent) of being photographed. Our workforce will endeavor to make suitable arrangements to apply any restrictions required whilst also minimising the disruption to normal operations. These arrangements will be agreed in advance with those with parental responsibility for the player or participant. Consent in respect of an Adult at Risk must uphold



the dignity of the participant opting out.

9.6 *Storage*

All images, whilst held by Manchester City, will be securely stored on the appropriate Manchester City or City Football Group issued IT systems and hardware, and remain the property of the club or City Football Group at all times. Where footage is passed to players and parents for training and development purposes this must not be passed on further or published without the written permission of the relevant management staff. Families must be made fully aware of this restriction at the point of distribution.

9.7 *Match Day, Events, Incidental Image Capture & Implied Consent*

At events such as matches, concerts and special events, consent is assumed to be 'implied' in that any person attending should expect that their image may be captured or broadcast. As such this is included in ground rules or ticket terms and conditions. In any situations where children may be subject to 'incidental image capture' (i.e. they are in the background behind a main subject), where practical they should be informed that they may be on camera and have the opportunity to opt out. Where a person finds that their image or that of their child has been used in these circumstances and they do not wish it to be used then we will endeavour to remove it from circulation where it is practical to do so and where there are reasonable grounds to do so.

9.8 *Parents, Other Children and Other Photographers*

Manchester City recognises that in some circumstances parents, other family members and friends may wish to take photographs of their children or relatives. Each site will develop clear rules on what is acceptable. Where a member of the workforce or child or parent has a concern about the capture and use of images they should report this immediately to the activity or site manager. With the advent of smart phones with digital cameras and instant connectivity to the internet, the scope for the capture and sharing of images has increased dramatically and as such activity managers should take care to apply the policy firmly, fairly and realistically.

9.9 *General Guidance on image capture*

In general, and for the protection of both participants and workers, the workforce must refrain from:

- i. using own/personal equipment to capture images of participants;
- ii. capturing images in changing rooms or where children are not fully or appropriately clothed;
- iii. capturing images of children who wish not to be in the photograph or whose parent does not wish them to be;
- iv. capturing images where children are more vulnerable – upset, injury, illness;
- v. capturing images that are sexually suggestive or provocative; and



- vi. the inclusion of young or vulnerable participants' full names in any captions, kit livery or reports.

10. SAFER RECRUITMENT

10.1 All Manchester City operations carry out 'safe recruitment' protocols for everyone who works for the Club, and in particular all those members of the workforce who are in regular direct contact with children as part of their role.

10.2 Whilst full details of the Clubs approach can be found in the Safer Recruitment Policy, key elements of the Clubs safer recruitment approach are presented below:

- i. clear job descriptions, specifications and selection criteria agreed prior to a post being advertised;
- ii. all roles require a DBS check prior to appointment, with those in Regulated activity requiring an enhanced check (with Barred list);
- iii. formal application systems are used by applicants;
- iv. interviews are held, where possible in person, and by a minimum of three suitably experienced staff;
- v. where appropriate, interviewees are asked about their understanding of safeguarding within a sport environment and their role within that;
- vi. background checks are undertaken – criminal records, references, gap analysis, verification of certificates and any other local requirements – and completed BEFORE a person is deployed into the role;
- vii. where individuals have lived or worked outside the United Kingdom, appropriate international criminal background checks or equivalent screening will be obtained where possible or reasonably practicable to do so;
- viii. where content is present on a DBS certificate, a risk assessment to ensure suitability is carried out prior to the commencement of employment; and
- ix. workers must be issued with a contract of employment (or volunteer agreement) which requires them to apply all necessary organisational policies and it must (where local employment law permits) also require the member of the workforce to declare any criminal convictions acquired during their period of employment.
- x. should a member of the workforce be investigated by the police following an allegation of criminal activity they must notify the Club. This must be made to the People Services department and will be treated in the strictest confidence. Should such notification not take place, this may result in a breach of the Safeguarding Policy which may lead to disciplinary action.

11. LINKS TO OTHER POLICIES

11.1 This policy forms part of an overall set of policies and procedures that fall under our safeguarding umbrella. Please see below additional policies in place that underpin our safeguarding practice:



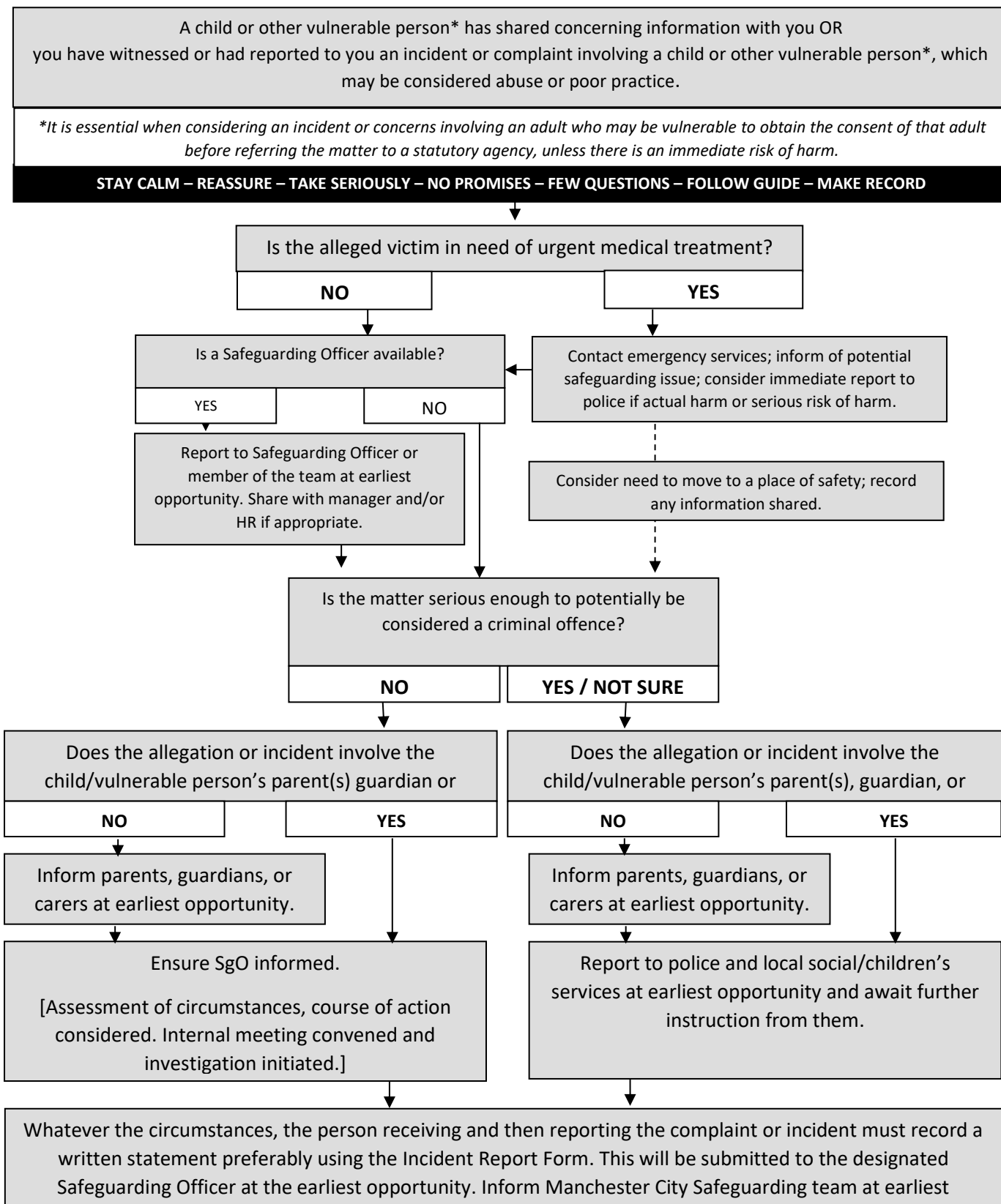
- i. GDPR / Privacy Policy*
- ii. Safeguarding Privacy Statement*
- iii. Whistleblowing Policy*
- iv. Disciplinary Policy*
- v. Grievance Policy*
- vi. Safer Recruitment Policy*
- vii. Lone Working Policy*
- viii. Safeguarding Code of Conduct*
- ix. Anti-bullying Policy*
- x. Managing Allegations Policy*
- xi. Social Media Policy*
- xii. ICT Acceptable Use Policy*
- xiii. Equality, Diversity and Inclusion Policy*
- xiv. Anti-Modern Slavery Policy*
- xv. Data Protection Policy*
- xvi. Bullying & Harassment Policy*
- xvii. Domestic Abuse Policy*
- xviii. Email and internet use Policy*



Appendix 1: Responding to a Concern, an Incident, or an Allegation.

Responding to a Concern, an Incident, or an Allegation

The flowchart presented below details the **immediate response** to an incident or concern involving a child or other vulnerable person.





Appendix 2: External Contact Details and GM Local Authorities

Greater Manchester Police 999 Emergency telephone number 101 non-emergency number	GB Group Disclosure and Barring Service 0845 251 5000	NSPCC 0808 800 5000
Care Quality Commission 0300 061 6161	The Football Association 0845 210 8080	Charity Commission 0300 066 9197
Ofsted 0300 123 1231	Premier League Safeguarding@premierleague.com	Premier League Charitable Fund safeguarding@plcf.co.uk 0207 864 9000

Children and Young People

Bolton 01204 331 500 Out of hours 01204 337 777	Salford 0161 603 4500 Out of hours 0161 794 8888
Bury 0161 253 5678 Out of hours 0161 253 6606	Stockport 0161 217 6028 Out of hours 0161 718 2118
Manchester (24/7) 0161 234 5001	Tameside 0161 342 4101 Out of hours 0161 912 2020
Oldham 0161 770 7777 0161 770 6936	Trafford 0161 912 5125 Out of hours 0161 912 2020
Rochdale 0300 303 0440 Out of hours 0300 303 8875	Wigan 01942 828 300 Out of hours 01942 828 777

Adults at Risk

Bolton 01204 337 000 Out of hours 01204 337 7777	Salford 0161 212 4323 Out of hours 0161 794 8888
Bury 0181 253 5151 Out of hours 0161 245 6606	Stockport 0161 217 6029 Out of hours 0161 718 2118
Manchester (24/7) 0161 234 5001	Tameside 0161 342 2400 Out of hours 0161 912 2020
Oldham 0161 770 1515 Out of hours 0161 770 6936	Trafford 0161 912 5127 Out of hours 0161 912 2020
Rochdale 0300 303 8886 Out of hours 0300 303 8875	Wigan 01942 828 777

Manchester Local Authority Designated Officer (LADO)
0161 234 1214 or email LADO@manchester.gov.uk



Appendix 3: Abuse and Poor Practice

Children and Abuse

Manchester City along with the wider CFG has adopted the categories of abuse as defined in the International Safeguards¹⁴ and these are neglect, physical abuse, sexual abuse, emotional abuse, exploitation and bullying. Manchester City also recognises 'hazing' as a form of abuse; this is a term that originates in the United States but is becoming more widely used.

Manchester City also considers that these categories apply to adults who may have additional vulnerability but a more detailed explanation in respect of adults is presented below. Manchester City also considers financial abuse and fraud as further risks that may apply to our participants.

Neglect

Neglect takes place when there is an ongoing failure to meet a child's basic needs. There are different types of neglect, physical, emotional, educational and medical. Examples; if an adult with responsibility for the care or supervision of a child fail to meet a child or young person's basic physical needs, e.g. for food, warmth and clothing, or emotional needs such as attention or supervision (and in the care of a parent affection). It occurs if children or young people are left alone or inadequately supervised or where they are exposed to danger, injury, or extreme situations, such as weather conditions.

In Manchester City activities, neglect could occur if children or young people do not have proper supervision, clothing or are allowed or encouraged to play whilst injured. It could occur if a child or young person's needs are disregarded before, during, or after a game or training.

Physical abuse

Physical abuse occurs when a child is deliberately hurt. This can be if people physically hit, burn, poison, shake or in some way hurt or injure children and young people, or fail to prevent these injuries from happening.

In sport, physical abuse could happen where training methods are inappropriate for the developmental age of the child or young person, where they are allowed or forced to play with an injury or where inappropriate drugs or alcohol are offered or accepted. It would clearly happen if a child or young person is hit or physically restrained or manhandled by those supervising the game or training session.

Sexual abuse

When a child or young person is sexually abused, they're forced, tricked or manipulated into sexual activities. They might not understand that what's happening is abuse or that it's wrong for the abuser

¹⁴ <https://thecpsu.org.uk/resource-library/tools/international-safeguards-for-children-in-sport/>

Coordinated by UNICEF, the standards reflect international declarations, the United Nations Convention on the Rights of the Child, relevant legislation, government guidance, existing child protection and safeguarding standards, and good practice.



to do this to them. They might be afraid to tell someone or behave as though this is normal for them to experience, both are valid for the child to be displaying. Sexual abuse can happen anywhere – and it can happen in person or online. (This is from NSPCC and a good description)

Sexual abuse occurs if children or young people are used to meet another person's sexual needs. This includes any form of sexual behaviour with a child or young person (by an adult or another child or young person), the use of sexually explicit language and jokes, inappropriate touching, and exposure to pornographic material.

Sexual abuse can occur in sporting settings and sport participation, by those with mal-intent, may be used as a method to facilitate access to children, facilitate grooming-type practices, and to isolate children from their parents, other workers or other participants.

Child sexual exploitation

Child sexual exploitation (CSE) is a type of sexual abuse. Children in exploitative situations and relationships receive something such as gifts, money, or affection as a result of performing sexual activities or others performing sexual activities on them.

Children or young people may be tricked into believing they are in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed and exploited online.

Some children and young people are trafficked into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs.

Emotional abuse

Emotional Abuse is when a child is emotionally mistreated. Examples of emotional abuse include frequent threatening, taunting or sarcastic behaviour, along with with-holding affection or being extremely over-protective. It includes racist or sexist behaviour and demeaning initiation ceremonies. It can be inflicted by other children and young people as well as by adults. Children and young people who are being abused or bullied in other ways will often also experience emotional abuse.

In sport, coaches or parents emotionally abuse children and young people if they constantly criticise, abuse their power, or impose unrealistic pressure to perform to a high standard. It may also occur if a club allows members to deride people with disabilities or from minority cultures and use derogatory language about them.

Bullying & Hazing

Although anyone can be the target of bullying, children and young people who are perceived as “different” from the majority may be at greater risk of bullying. This includes children and young people from other ethnic groups or children and young people with disabilities. Victims are often shy and sensitive and perhaps anxious or insecure. Bullying can be defined as:

- Physical: hitting, kicking and theft.
Verbal: name calling, constant teasing, sarcasm, racist or homophobic taunts and, threats
Emotional: tormenting, mobile text messaging, ridiculing, humiliating and ignoring
Sexual: unwanted physical contact or sexually abusive comments.



- Bullying can take place anywhere, but is more likely to take place where there is inadequate supervision. In sport it is more likely to take place in the changing rooms, or on the way to and from the pitch - but can also take place at a training session or in a competition.
- Hazing involves coercing, requiring, forcing or willfully tolerating any humiliating, unwelcome or dangerous activity that serves as a condition for joining a group or being socially accepted by a group's members.
- Sport's competitive nature can create and even support an environment for the bully if individuals and clubs are unaware. The bully in sport can be a parent who pushes too hard, a coach or manager who has a win-at-all costs philosophy; a child or young person intimidating another; or an official who places unfair pressure on a child or young person. The victim is often weaker and less powerful and the outcome is always painful and distressing.

Grooming

Grooming is when someone builds an emotional connection with an individual to gain their trust for the purposes of abuse or exploitation.

Many children or other vulnerable people do not understand that they have been groomed, or that what has happened is abuse. Grooming happens both online and in person. Groomers will hide their true intentions and may spend a long time (this could be years) gaining an individual's trust. They may also try to gain the trust of the whole family so they can be alone with the person for the purpose of committing abusive behaviour.

Grooming activity may include:

- offering advice or understanding
- buying gifts
- giving the child attention
- using their professional position or reputation
- taking them on trips, outings, or holidays
- using secrets and intimidation to control children

Once they have established trust, groomers will exploit the relationship by isolating the individual from friends or family and creating a dependent relationship. They will use any means of power or control to make the individual believe they have no choice but to do what they want.

Groomers may introduce 'secrets' or threats to control or frighten the individual. Sometimes they will blackmail them, or make them feel ashamed or guilty, to stop them telling anyone about the abuse.

Child criminal exploitation:

Child criminal exploitation is common in county lines (where children are instructed to deliver and/or store drugs, and associated money or weapons, to dealers or drug users, locally or in other counties) and occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always



involve physical contact; it can also occur through the use of technology. Criminal exploitation of children, young for the supply of drugs, and transportation of the associated money and weapons, has a devastating impact on victims, families and local communities but is often not recognised by those who are best placed to spot it.

Adults and Abuse

Manchester City activities may include adults. In particular adults will be present at match day events, other large-scale events and some foundation activities. Staff have a duty to refer any concerns they may have about an individual, group or an adult who works with adults who may be vulnerable or at risk of harm.

The Care Act 2014 provides a useful list of different categories of abuse that adults may be subjected to. These are:

- Physical abuse – including assault, hitting, slapping, pushing, misuse of medication, restraint, or inappropriate physical sanctions.
- Domestic violence – including psychological, physical, sexual, financial, emotional abuse; so called ‘honour’ based violence.
- Sexual abuse – including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.
- Psychological abuse – including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.
- Financial or material abuse – including theft, fraud, internet scamming, coercion in relation to an adult’s financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
- Modern slavery – encompasses slavery, human trafficking, forced labour and domestic servitude.
- Discriminatory abuse – including forms of harassment, slurs, or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation, or religion
- Organisational abuse – including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one’s own home.
- Neglect and acts of omission – including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating
- Self-neglect – this covers a wide range of behaviour neglecting to care for one’s personal hygiene, health or surroundings and includes behaviour such as hoarding.

Poor Practice / Low Level Concerns

This occurs in instances where members of the workforce do not uphold the highest standards of care and support when carrying out their duties. Where poor practice is unchallenged and allowed to



continue this can become abuse. Poor practice is unacceptable and where highlighted must always be treated seriously and appropriate action be taken.

The CFG Safeguarding Code of Conduct presents a broad list of conduct, both expected and prohibited, which could constitute a concern, some of which may be considered low-level/poor practice.

The Affiliated Football's Safeguarding Children Policy and Procedures provides the following examples of poor practice:¹⁵

- When insufficient care is taken to avoid injuries (e.g. by excessive training or inappropriate training for the age, maturity, experience, and ability of players)
- Allowing abusive or concerning practices to go unreported (e.g. a coach who ridicules and criticises players who make a mistake during a match)
- Allowing hazing practices to go unreported
- Placing children or young people in potentially compromising and uncomfortable situations with adults (e.g. inappropriate use by a coach of social media with a young player(s))
- Ignoring health and safety guidelines (e.g. allowing young players to set up goal posts unsupervised by adults)
- Failing to adhere to the club's codes of practice (e.g. openly verbally abusing the referee)
- Giving continued and unnecessary preferential treatment to individuals (Please note – this list is not exhaustive)

¹⁵ As of August 2020, this list is under review and Manchester City recognise that this list fails to recognise a broad range of conduct that would be considered poor practice / low level maltreatment. If it was under review in 2020 shouldn't it be sorted now and cover the range?



Appendix 4: Referral Management Group

The City Football Group requires those in its portfolio or clubs and other businesses to develop clear procedures for the response to concerns reported to the safeguarding team. CFG has also provided extensive guidance for the handling of such matters.

Manchester City has developed its own local policies for the management of reported safeguarding concerns / allegations. The Referral Management Group (RMG) process is one key element of that which draws together relevant stakeholders from across the business to allow for an effective response in these circumstances. This process does not override the statutory processes for investigation but sits alongside them.

Criteria:

- Where a concern is raised relating to the behaviour of a member of the workforce, there is a need to manage that referral in a swift and confidential manner.
- Serious concern that requires swift and confidential input from across the club.

The RMG will:

- not replace an immediate referral to the emergency or statutory agencies where a potentially criminal offence has taken place;
- not replace, but work in tandem with, the club's staff disciplinary policy;
- meet at the earliest convenience and need not necessarily meet face-to-face;
- comprise a minimum of three people; from
 - Director of Safeguarding;
 - Head of Safeguarding
 - Safeguarding manager and/or officer;
 - line manager;
 - People Services representative where a member of permanent staff is involved and/or
 - a member of the club's senior management or appointed deputy.
- Protect the identity of the complainant where requested or appropriate (though this is not always possible for the complete duration of the disciplinary process or where criminal investigation is required);
- Consider the suspension of any member of the workforce (through HR and note any actions taken by the Football Association);
- Appoint an independent investigator, where one maybe required;
- Keep the complainant informed over the progress of the referral unless this may jeopardise the fairness of the process; and
- Record and store in a confidential manner, the details of the matter and any meetings relating to the referral.

The RMG will consider the facts of the concern or allegation and may either:

- refer to People Services or line manager, and/or to the clubs disciplinary process; and/or
- conduct its own investigation (and where the 'accused' is not permanent staff) using an independent member of staff; and/or
- make an external referral to statutory agencies or regulators (football, charity, medical or other); or
- take no further action.



Where an investigation has taken place and the RMG must consider the evidence presented to them, the burden of proof used to decide on an outcome will be 'balance of probability' (i.e. more likely than not).



Appendix 5: Responding to a Disclosure

When working with children and young people, all members of the workforce need to be alert to the possibility that safeguarding concerns may arise. A child needs to have someone they can trust to feel able to disclose abuse they may be experiencing. They need to know they will be listened to believed and will get the help they need. Without these things they may be vulnerable to continuing abuse.

You should deal with disclosures of abuse sensitively and professionally. The following approach is suggested as best practice for dealing with these disclosures. The role of any workers having potential abuse, bullying or poor practice, is to pass it on to the appropriate person.

Recognise

Appreciate that you are in receipt of a disclosure. Ensure that you create a space in which the individual disclosing can feel comfortable and safe to explain their concerns.



Respond

- React calmly
- Listen carefully and attentively
- Take the child seriously
- Reassure the child that they have taken the right action in talking to you
- Do not promise to keep anything secret
- Ask questions for clarification only. Do not ask leading questions
- Check back with the child that what you have heard is correct and understood
- Do not express any opinions about the alleged abuser
- Ensure that the child understands the procedures that will follow



Refer

- Contact a member of the safeguarding team
- Where the child is at immediate risk of harm keep them with you until advised otherwise by a member of the safeguarding team, emergency services or the Local Authority.



Record

- Make a written record of the conversation as soon as possible, in as much detail as possible, using the words the child / Adult at risk used to record the disclosure.
- Complete a safeguarding referral within 24 hours. This should be sent to a safeatcity@mancity.com or a member of the Safeguarding Team.



Appendix 6: Safeguarding Code of Conduct

Everyone plays a role in safeguarding the welfare and development of children and the protection of other vulnerable people. As an individual responsible for children or other vulnerable people taking part in a City Football Group activity you have a duty to:

- **Ensure that the safety and welfare of all participants is your priority** and ensure that any planning, preparation, delivery, or review reflects this duty, and all actions are in the best interests of those in your care.
- **Treat children and other vulnerable people with respect**, regardless of their gender, ethnic or social background, language, religious or other beliefs, disability, sexual orientation, or other status and encourage them to treat others the same way. Always consider the age, maturity, understanding and emotional condition of participants when working with them.
- **Listen carefully to children and vulnerable people** about their needs, wishes, ideas and concerns and take them seriously.
- **Reward effort as well as performance.**
- **Only use physical contact with participants where necessary.** If contact is necessary, (e.g. for the purposes of coaching or first aid), then explain to the child what the contact is for, and change your approach if he or she appears uncomfortable and conduct this in an open and transparent way.
- **Establish clear codes of conduct for participants and apply disciplinary policies equally and fairly** in respect of poor behaviour. Physical punishment or discipline or use of aggressive physical force of any kind towards any participant in your care is prohibited.
- **Always use language or behaviour towards participants and others that is appropriate** and do not use language or behaviour that is or could be considered harassment, abuse, sexually provocative or demeaning. You are a role model to both participants and other members of the workforce, your appearance, attitude, behaviour, and language has a direct effect on your role.
- **Not supervise or care for others whilst under the influence of alcohol or illegal drugs** or any medication that may impair your ability to ensure a player's welfare.
- **Not appear to favour one child or show interest in one child more than another.**
- **Wherever possible, ensure that more than one member of the workforce is present** when working in the proximity of children or other vulnerable people. It is inappropriate to spend excessive time alone with those children you supervise or care for or to take them to your home.
- **Always maintain professional boundaries in person and online.** Do not engage in physical 'horseplay' with any participants and where possible avoid personal involvement in the activity you are responsible for. Be careful when engaging participants in 'banter' as this can easily be misunderstood. Recognise the danger to self and others when online.
- **Not engage in any form of sexual activity with or involving a child or vulnerable person in your care.** Such activity is prohibited regardless of the legal age of consent and is considered a breach of this Policy.
- **Report any concerns you have over a person in your care or the actions of a member of the workforce.** If you witness or are told about any incident or issue that may put a vulnerable person at risk or harm, or may breach this policy, you have a duty to report it to the appropriate person (and only share the information with those who need to know) This may be your line manager or designated safeguarding officer.

It is everyone's responsibility to uphold this Code. Any breach of the Code is likely to lead to disciplinary action and in some cases a criminal prosecution.



Appendix 7: Definitions

- 1.1 Abuse** is the improper treatment of others. Harm will often be related to or arise from abuse or maltreatment of children, young people, or Adults at Risk. There are several forms of abuse provided for in UK law, many relating to both children and adults: emotional (including bullying, hazing), discriminatory, financial, physical, neglect and sexual (including grooming). Financial abuse is something more usually related to adults but where professional (and future professional) footballers are concerned this is a significant area of risk. The types of abuse recognised by the CFG and Manchester City are detailed in Appendix 3.
- 1.2 Activity** (or activities) refers to any Manchester City and CITC business operation or setting including football matches, events, coaching or education programmes, medical or sports science programme, football tours or other related activities where the Club has a responsibility (both direct or indirect) for the welfare and safety of individuals taking part.
- 1.3 Adult** refers to any person aged 18 and over.
- 1.4 Adult(s) at Risk (previously referred to as vulnerable adults)** - this refers to adults (those who are 18 or over, in most countries) who may have some form of additional vulnerability, including, but not limited to: disability, intellectual vulnerability, mental health conditions, homelessness and drug addiction, and as such may be in receipt of state care and require additional support to participate in Club activity. This may also mean an adult who because of their situation (e.g. an accident, injury, or excess alcohol use) becomes vulnerable whilst in or under our care. The Club recognises that the legal position in respect of adults is complex and any Safeguarding intervention may require the consent of the individual prior to any action being taken.
- 1.5 Capacity** refers to the ability to decide at a particular time, for example when under considerable stress. The starting assumption must always be that a person has the capacity to make a decision unless it can be established that they lack capacity under the [Mental Capacity Act 2005](#).
- 1.6 Child / Children** includes everyone under the age of 18.
- 1.7 Child protection** is the process of protecting individual children identified as either suffering, or likely to suffer, significant harm because of maltreatment, abuse, exploitation or neglect. It involves measures and structures designed to prevent and respond to abuse and neglect. Child protection is part of an effective Safeguarding framework and any measures or action would involve intervention from statutory agencies
- 1.8 Consent** is the agreement or permission to do or allow something. Most activities involving children require the consent or approval of the child's parent.



- 1.9 Grantees** refers to other organisations who are funded/grant-aided through the charitable elements of the City Football Group, Manchester City and CITC.
- 1.10 Harm** means injury, loss or damage or the impairment of health or development of an individual by action or omission in respect of another (such as abuse or maltreatment). Harm may be physical, intellectual, emotional, social, or developmental and for the purpose of this Policy it may also mean the *threat* or *risk* of harm.
- 1.11 Parental Responsibility (PR)** refers to those individuals with legal responsibility for a specific child. Where consent is required in respect of a child taking part in Manchester City related activities, or reporting a concern, we will take all reasonable steps to identify the person(s) with legal PR for that child. Where identifying PR is complex or disputed (not all parents have PR and not all people with PR are parents), we will also encourage all relevant information to be shared amongst all individuals involved in the care of that child by those with PR.
- 1.12 Participant(s)** refers to any person who takes part in an Manchester City-related activity and may include (but not limited to) being a spectator or a player at a match or event, taking part in a sport coaching or educational activity, engaging with the club through social media, or being part of a junior membership scheme. Further detail is presented in 2.7.
- 1.13 Partners(s) or Partnership** refers to any organisation or commercial relationship. linked by legally binding agreement to the Club (or this may be the City Football Group) and may include sponsors, commercial partners, or contractors.
- 1.14 Regulated Activity** refers to certain roles that involve working with children or vulnerable adults, such as teaching and providing care. Anyone who is on the Disclosure and Barring Service (DBS) barred lists cannot work in these roles.
- 1.15 Safeguarding** is a term used in the UK and is a shortening of the phrase ‘safeguarding and promoting the welfare of children and adults’ and refers to:
- i. protecting children, young people and Adults at Risk from harm resulting from abuse, neglect, harassment, or maltreatment.
 - ii. ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
 - iii. taking action to enable all children, young people, and Adults at Risk to have the best outcomes.
- 1.16 Stakeholder** is a term used to refer to any persons who have an interest or involvement in the activity and or the delivery of the activity or the welfare of those taking part in the activity. This may include (but not exhaustively): participants, workers, managers, partners, parents and family members, supporters, those who engage through social media channels, statutory agents, and regulatory agents. These may vary from setting to setting.



1.17 Workforce (Worker) refers to any person, employed or deployed, by managers to work in a paid or voluntary capacity on a Manchester City activity (or Group activity linked to the Club). Such individuals may be full or part-time, permanent or fixed term staff employed directly by Manchester City; they may be deployed by the Club on a temporary or casual basis; or they may be volunteers deployed by management; they may be deployed via a third party contractor, grantee, licence holder, or partner.