

Safeguarding Policy and Procedures



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Introduction

The Premier League is committed to delivering the highest standards of care and protection for Children and Adults at Risk. We expect everyone we work with, regardless of their role or relationship with us, to uphold this commitment as Safeguarding is a collective responsibility. Together, we all play a vital role in promoting and protecting the rights, safety, and wellbeing of Children and Adults at Risk.

This Policy and its associated Procedures set out how we deliver our Safeguarding commitment and outline the responsibilities of all Workforce Members to ensure that Safeguarding is implemented consistently, effectively, and to the highest standard across all areas of our work.

We recognise that our Safeguarding measures must evolve through continuous learning and respond to emerging risks. We will review our Safeguarding procedures and practices annually, or sooner if required by new or amended relevant legislation, statutory guidance, or regulations, or following any significant Safeguarding incident. The current version of this Policy will always be available on the Staff Intranet and our website.



Contacts



The Premier League's Safeguarding team can be contacted by emailing: safeguarding@premierleague.com or by calling 020 8157 9000

Clubs

Each member Club has its own Safeguarding policies, procedures, and dedicated staff. If you work for a Club, or if you or your Child are involved in a Club activity, you can access their Safeguarding policies and contact details for advice or to raise a concern [here](#).



The Premier League Charitable Fund has its own Safeguarding policies and procedures. Their Safeguarding team can be contacted by emailing: safeguarding@plcf.co.uk

Click [here](#) for more information.



The FA's Safeguarding team can be contacted by emailing: safeguarding@thefa.com

Click [here](#) for more information.

In an emergency, or if you believe there is an imminent or significant risk of harm to anyone, call 999



Definitions

Activity(ies) means any in-person or online event, product, service, or content delivered, commissioned, or endorsed by the Premier League, involving or intended for Children and/or Adults – whether as spectators, participants, players, service users, content consumers, workers, volunteers, or in any other capacity.

Adult(s) at Risk means any person(s) aged eighteen or over who has needs for care and support (whether or not the local authority is meeting any of those needs) and is experiencing, or at risk of, abuse or neglect and as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

Affiliated Individuals means any prospective, current, or former employee, worker, volunteer, consultant, contractor, Player or Academy Player (as defined in Premier League Rules) associated with an FA-affiliated league or club.

Child(ren) means any person(s) who have not yet reached their eighteenth birthday.

Prominent Individuals means persons well-known for their achievements, influence, or public profile, including, but not limited to; social media influencers or personalities, current or former footballers or athletes, actors, TV personalities, musicians, politicians, and high-profile business or media professionals.

Workforce Members means any paid employees, persons on fixed-term contracts, workers, secondees, trainees, apprentices, and interns of the Premier League or its associated companies; Football DataCo and the Professional Game Academy Audit Company.

Safeguarding

Safeguarding Children is the action that is taken to promote the welfare of Children and protect them from harm. This means:

- protecting Children from abuse and maltreatment;
- preventing harm to their mental and physical health or development;
- ensuring they grow up with the provision of safe and effective care; and
- taking action to enable all Children to have the best outcomes

Adult Safeguarding means protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted. Abuse of adults links to the circumstances rather than the characteristics of the people experiencing the harm.



Our commitment and approach to Safeguarding

Safeguarding commitment and mission

Safeguarding is a fundamental responsibility shared by everyone. We are committed to implementing robust procedures and practices to effectively promote and protect the rights, safety, and wellbeing of Children and Adults at Risk. Through robust and transparent accountability, and by embedding Safeguarding in our values, priorities, and daily operations, we strive to create environments that are safe, inclusive, and responsive.

Core Safeguarding principles

Culture, leadership, and governance

Demonstrating top-level commitment, implementing robust governance measures, and embedding a culture of continual reflection, learning, and shared responsibility for Safeguarding are essential

Prevention

Prevention is the primary aim of our Safeguarding arrangements

Education and empowerment

Raising awareness and empowering stakeholders enhances our ability to deliver effective care and protection for Children and Adults at Risk

Protection

Children and Adults at Risk have the unconditional right to protection from abuse and mistreatment in any form

Working together

Working together underpins our approach to Safeguarding

Strategic Safeguarding aims

Embedding Safeguarding principles into our values and priorities while promoting behaviours and practices that uphold and respect the rights, safety, and wellbeing of Children and Adults at Risk

Creating safe and positive experiences and maintaining environments that minimise the likelihood of any form of abuse or mistreatment of Children and Adults at Risk

Equipping stakeholders to understand and embrace their Safeguarding responsibilities while ensuring those we aim to safeguard feel valued, protected, and empowered

Acting in the best interests of and providing effective protection for Children and Adults at Risk

Ensuring we work collaboratively with stakeholders to deliver a coordinated and robust approach to Safeguarding



We deliver our strategic Safeguarding aims by:

Culture, leadership and governance	Prevention	Education and empowerment	Protection	Working together
• Fostering a culture where Safeguarding is recognised and upheld as a shared responsibility at all levels • Ensuring Board-level accountability for Safeguarding, supported by dedicated Safeguarding employees • Proactively identifying risks and applying effective mitigation measures, monitoring and adapting controls as necessary • Maintaining effective policies, procedures, and rules, supported by robust governance arrangements • Quality assuring and regularly reviewing safeguarding procedures and practices to ensure their ongoing relevance and effectiveness, and to drive continual reflection, learning, and improvement • Ensuring Premier League and Club Safeguarding measures are subject to regular independent scrutiny	• Upholding the highest standards of practice and behaviour • Ensuring stakeholders have access to the support and guidance they need to fulfil their Safeguarding responsibilities • Applying robust processes to prevent unsuitable individuals from working with, having access to, or exerting influence over Children and Adults at Risk • Carrying out due diligence to ensure we work with partners and service providers who share our commitment to Safeguarding, and by providing support to strengthen practice where needed • Embedding Safeguarding considerations into the planning, delivery, and review of all our Activities	• Actively communicating our Safeguarding commitment and expectations to all stakeholders • Delivering regular training to ensure the rights of Children and Adults at Risk are upheld and that their needs are met by a confident, competent workforce • Empowering stakeholders to take appropriate action if they become aware of, witness, or suspect abuse or other Safeguarding concerns • Supporting Children and Adults at Risk to understand their rights and empowering them to access support when needed and share concerns about anything affecting their safety or wellbeing • Ensure training and awareness-raising efforts are regularly reviewed and adapted, informed by internal and external learning, and responsive to regulatory and legislative changes	• Implementing effective procedures and systems for reporting and responding to Safeguarding concerns and allegations • Taking Safeguarding concerns and allegations seriously and ensuring that they are dealt with swiftly, proportionately and appropriately • Acting in the best interests of, and providing effective protection for, Children and Adults at Risk • Sharing information with relevant agencies and regulators to protect the safety and welfare of Children and Adults at Risk, and in accordance with our statutory and regulatory obligations • Identifying learning after incidents to minimise risk of recurrence and strengthen our procedures and practices	• Supporting Workforce Members to integrate contextual and proportionate Safeguarding considerations into our procedures and Activities • Working in partnership with football bodies to align our efforts and share good practice • Supporting Clubs with their Safeguarding arrangements, encouraging collaboration, and facilitating practice sharing and learning opportunities • Working with statutory partners and regulators to support coordinated and effective responses to Safeguarding concerns and allegations • Engaging with stakeholders to understand their insights and experiences, and meaningfully considering their feedback to inform and enhance our Safeguarding efforts



Culture, leadership, and governance

Creating a positive Safeguarding culture involves fostering an environment where Safeguarding is understood, embraced, and integrated into all areas of our work. It enables Workforce Members to play their part, recognise abuse and concerns, and feel confident to report them. Children and Adults at Risk are also more likely to speak up about abuse or other concerns, knowing they will be supported and protected. Such a culture promotes shared responsibility, reinforces trust, and strengthens accountability.

The Premier League is committed to fostering a culture where:

- There is a collective belief that Safeguarding is fundamental to everything we do;
- Safeguarding is recognised and delivered as a shared responsibility at all levels;
- Safeguarding is central to everyday decisions, actions and behaviours;
- Trust and accountability underpin all behaviours and relationships; and
- Everyone feels confident and empowered to seek support when needed and to report any concerns.



Roles and responsibilities

The Board

The Premier League's Board holds ultimate responsibility for ensuring effective Safeguarding arrangements are in place, with the Chief Executive acting as the Board-level Safeguarding champion

Safeguarding team

While Safeguarding is everyone's responsibility, we have a dedicated Safeguarding team that leads on workstreams to achieve our strategic Safeguarding aims in collaboration with relevant stakeholders, guides and supports Workforce Members and Clubs in fulfilling their responsibilities, and leads the response to Safeguarding concerns

Safeguarding Champions

We have designated Safeguarding Champions across the business who support our Safeguarding team with raising awareness and embedding a culture where Safeguarding is recognised and delivered as a shared responsibility across all areas of our work

Workforce Members

All Workforce Members have a duty to ensure that the rights, safety, and wellbeing of Children and Adults at Risk underpin their conduct and actions, both within and outside the workplace, and that they adhere to this Policy and associated Procedures



Safeguarding governance in football



The FA is the governing body of football in England, responsible for overseeing the development, regulation, and integrity of the game at all levels.

The FA's regulatory framework seeks to protect Children and Adults at Risk from potential harm posed by Affiliated Individuals. Under this framework, The FA may issue interim or permanent suspension orders restricting Affiliated Individuals from all or specific activities within affiliated football, and may impose sanctions on Affiliated Individuals, leagues, and clubs for breaches of its regulations.

Click [here](#) for more information.



The Premier League is the governing body of the Premier League football competition with responsibility for the organisation and regulation of the league, through the uniform application of its Rules to its Clubs and their officials and players.

This Policy and associated Procedures underpin all our central Activities.

Regulating and supporting Clubs

The Premier League has a dual role in supporting Clubs with the implementation of their Safeguarding arrangements and in evaluating Club compliance with our Safeguarding Rules and Standards through an independent audit process.

Click [here](#) for more information.



Education and empowerment

Part of our Safeguarding commitment involves ensuring that everyone involved with the Premier League undertakes regular training to uphold the rights of Children and Adults at Risk. This also supports our aim to embed a culture where Safeguarding is recognised and delivered as a shared responsibility.

Upon commencing their role, Workforce Members are required to complete our Safeguarding e-learning module and attend our new starter Safeguarding training, followed by regular refresher training. The content and frequency of ongoing training vary depending on individual responsibilities and involvement with specific Activities.

Understanding and recognising abuse and other concerns

Abuse can be perpetrated by anyone and can occur anywhere; it may be a single act or a repeated series of actions. Understanding and being able to recognise low-level concerns, abuse and other harms is vital to maintaining a safe environment. The information in this section aims to support Workforce Members' understanding of these issues.

Low-level concerns

A low-level concern arises when an adult's actions contradict codes of conduct, policies and procedures, or cause any level of unease about their suitability to work with Children and/or Adults at Risk. This includes behaviour outside the workplace. These concerns span a range of behaviours, from inadvertent or thoughtless actions to those that might be inappropriate depending on the circumstances, and behaviour intentionally aimed at enabling abuse at a later time. Early identification and prompt management of low-level concerns are crucial for effective Safeguarding. The term 'low-level' does not imply insignificance; it indicates that the conduct does not meet the threshold for external referral and intervention. However, repeated low-level concerns may necessitate consultation with and referral to statutory agencies and/or The FA.

Non-recent abuse

Non-recent abuse, also known as historic abuse, refers to allegations of neglect, physical, sexual, or emotional abuse that occurred when the alleged victim was a Child, and the allegation is made by or on behalf of someone who is now an adult. Non-recent abuse must be responded to in the same way as a contemporary concern. Click [here](#) for more information.



Child abuse and other harms

Sexual abuse

Sexual abuse is when a Child is forced, enticed or manipulated to take part in sexual activities. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving Children in looking at, or in the production of, sexual images, watching sexual activities, encouraging Children to behave in sexually inappropriate ways, or grooming a Child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

Click [here](#) for more information about sexual abuse, including signs and indicators.

Physical abuse

Physical abuse involves 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.

In sport, physical abuse may occur when the nature and intensity of training or competing exceed the capacity of a Child's immature growing body, when Children are encouraged to use drugs or harmful substances to enhance performance or delay puberty, when they are forced or pressured to participate while injured, or when sanctions involve inflicting pain.

Click [here](#) for more information physical abuse, including signs and indicators.

Emotional abuse

Emotional abuse is the persistent emotional ill treatment of a Child. It is sometimes called psychological abuse and can seriously damage a Child's mental health and wellbeing. Emotional abuse can take different forms, such as when a Child is unfairly blamed for everything, told they are stupid, worthless, or ugly, and made to feel very sad and unhappy. It can also occur when a Child is not allowed to express their views, is deliberately silenced, or mocked for what they say or how they communicate. Additionally, emotional abuse includes imposing inappropriate expectations on a Child, restricting their capacity to learn, or preventing them from engaging in normal social interactions. It may involve bullying or cyberbullying, making a Child feel frightened or in danger or exploiting or corrupting them.

Click [here](#) for more information about emotional abuse, including signs and indicators.



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. It may also include neglect of, or unresponsiveness to, a Child's basic emotional needs.

In a sport setting, it may involve failing to ensure that Children are safe and adequately supervised or exposing them to unnecessary risks.

Click [here](#) for more information about neglect, including signs and indicators.

Domestic abuse

Domestic abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence, or abuse between those aged 16 years or over who are personally connected to each other. This includes people who are, or have previously been married, in civil partnerships or in relationships, or have a Child together, or are relatives, including abuse of adult parents or adult Children. The Domestic Abuse Act 2021 recognises Children as victims in their own right if they see, hear, or experience the effects of the abuse.

Click [here](#) for more information about domestic abuse, including signs and indicators.

Grooming

Grooming is when someone builds a relationship, trust and emotional connection with a Child so they can manipulate, exploit and abuse them. The abuse is usually sexual or financial, but it can also include other illegal acts. Groomers may also build a relationship with the Child's family or friends to make them seem trustworthy or authoritative. Grooming can happen both online and in person and can take place over a short or long period of time.

Click [here](#) for more information about grooming, including signs and indicators.

Hazing

Hazing is any ritual, initiation activity, actions or situations, with or without consent, which recklessly, intentionally or unintentionally endangers the physical or emotional wellbeing of Children. Hazing must not be encouraged or tolerated.

Radicalisation

Radicalisation is the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Radicalisation is considered a form of harm and can involve grooming, exploitation, psychological manipulation, exposure to violent material, and other inappropriate information.

Click [here](#) for more information about radicalisation, including signs and indicators.

Bullying and Cyberbullying

Bullying is intentional behaviour that harms someone, including name-calling, hitting, pushing, spreading rumours, threatening, or undermining. **Cyberbullying** occurs online and involves harassing, threatening, or intimidating someone through negative, harmful, false, or hurtful content, impersonation, sharing personal information, and leaving negative comments. Both forms of bullying can occur simultaneously.

Click [here](#) for more information about bullying and cyberbullying, including signs and indicators.

Other harms to be aware of

Click on the links below for further information:

[Harmful sexual behaviour and peer-on-peer abuse](#)

[Child sexual exploitation](#)

[Criminal exploitation and gangs](#)

[Online abuse](#)

[Child trafficking](#)

[Female genital mutilation \(FGM\)](#)

[Safeguarding talented and elite athletes](#)

[Child abuse in sports settings](#)



Adults at Risk abuse and other harms

The Care Act recognises **10** categories of abuse and neglect:

Emotional or psychological abuse

Emotional or psychological abuse includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation, or withdrawal from services or supportive networks.

Click [here](#) for further information, including signs and indicators.

Sexual abuse

Sexual abuse includes rape, sexual assault, or sexual acts to which the adult has not consented or was pressured into consenting.

Click [here](#) for further information, including signs and indicators.

Physical abuse

Physical abuse includes assault, hitting, slapping, pushing, kicking, hair-pulling, biting, rough handling, scalding, burning, misuse of medication, restraint, or inappropriate physical sanctions.

Click [here](#) for further information, including signs and indicators.

Financial or material abuse

Financial or material abuse involves the theft, misuse, or misappropriation of someone's property, possessions, or money.

Click [here](#) for further information, including signs and indicators.

Organisational or institutional abuse

Organisational or institutional abuse refers to neglect and poor care practices within a specific care setting, such as a hospital or care home, or in an individual's own home. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

Click [here](#) for further information, including signs and indicators.

Discriminatory abuse

Discriminatory abuse involves being treated unfairly or less well than others because of a protected characteristic.

Click [here](#) for further information, including signs and indicators.

Domestic abuse

Domestic abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence, or abuse between those aged 16 years or over who are personally connected to each other. This includes people who are, or have previously been married, in civil partnerships or in relationships, or have a child together, or are relatives, including abuse of adult parents or adult children.

Click [here](#) for further information, including signs and indicators.

Modern slavery

Modern slavery encompasses slavery, human trafficking, forced labour, and domestic servitude.

Click [here](#) for further information, including signs and indicators.

Self-neglect

Self-neglect refers to a situation where an individual is unable or unwilling to care for themselves adequately, leading to a risk of harm.

Click [here](#) for further information, including signs and indicators.

Neglect

Neglect refers to the ongoing failure to meet someone's basic physical or psychological needs. This can include ignoring medical or physical care needs and failing to provide access to appropriate health, social care, or educational services. It also encompasses the withdrawal of necessities of life, such as medication, adequate nutrition, and heating.

Click [here](#) for further information, including signs and indicators.

Other harms to be aware of - Click on the links for further information: [Cyberbullying](#) / [Forced marriage](#) / [Disability hate crime](#) / [Radicalisation](#)



Prevention

Promoting and protecting the rights, safety, and wellbeing of Children and Adults at Risk is everyone's responsibility. This means Workforce Members playing their part by:

- Collaborating closely with our Safeguarding team to deliver safe and positive experiences
- Creating environments in which any form of abuse, exploitation, or mistreatment of Children and Adults at Risk is highly unlikely to occur
- Ensuring the safety and welfare of Children and Adults at Risk, and always acting in their best interests
- Acting on any concerns about the safety or welfare of a Child or Adult at Risk, including concerns regarding the actions or inactions of those working with them

Relationships and positions of trust

Individuals who have responsibility, authority, or influence over Children and/or Adults at Risk are in relationships of trust with those in their care or those they come into contact with through their role. A relationship of trust exists when one party holds power or influence over another due to their role, responsibilities, or the nature of the Activity. It is crucial to recognise the inherent power imbalance in these roles and the significant responsibilities that come with them.

A position of trust is defined in the Sexual Offences Act 2003 and refers to specific roles and settings in which an adult has regular and direct contact with Children. This includes positions such as coaching, teaching, training, supervising, or instructing in contexts such as sports, education, or other organised activities. It is a criminal offence for someone in a position of trust to engage in sexual activity with a Child under their care, even if the Child has reached the legal age of consent.

Engaging in sexual activity or forming an intimate relationship with a Child or Adult at Risk will be treated as a serious breach of trust. This includes not only physical sexual contact but also non-contact activities, such as encouraging Children or Adults at Risk to engage in or witness sexual activity, produce pornographic or sexually explicit material, or participate in sexually explicit content.



Standards of practice and behaviour

This section is not an exhaustive list of expected or prohibited behaviours. Workforce Members must always act in the best interests of Children and Adults at Risk, ensuring that their safety and wellbeing remain the primary consideration where no specific policy or guidance exists. If any policies, guidance, or regulations conflict, the safety and welfare of Children and Adults at Risk must always take precedence.

These expectations aim to:



Provide a framework of expected standards of practice and behaviour that contribute to a safe and inclusive environment and culture



Support Workforce Members with fulfilling their responsibilities to promote and protect the rights, safety, and wellbeing of Children and Adults at Risk



Reduce the risk of misplaced allegations



Workforce Members are expected to:



Adhere to our policies and procedures, as well as any protocols or guidance issued by the Premier League from time to time in connection with specific Activities, and any role or Activity-specific risk assessments



Ensure the rights, safety, and wellbeing of Children and Adults at Risk always guide their actions and behaviour



Apply professional standards consistently and treat all Children and Adults at Risk equally, without favouritism, prejudice, or discrimination



Maintain professional boundaries in all in-person and online interactions with Children and Adults at Risk



Foster a culture where everyone feels comfortable raising concerns about inappropriate or harmful attitudes and behaviour towards Children or Adults at Risk



Ensure all Safeguarding concerns, incidents, and allegations are taken seriously and acted on in line with these Procedures



Immediately self-report any information that may present transferable Safeguarding risk or affect their suitability to work with Children and Adults at Risk



Maintain confidentiality when handling personal or sensitive data and when responding to Safeguarding concerns



Workforce Members must **never**:



Engage in, encourage, or assist abusive, harmful, or exploitative conduct, nor mistreat Children and Adults at Risk in any way or neglect their basic needs



Breach a relationship or position of trust in any setting



Use their position or influence, or provide any item, gift, or opportunity available to them through their relationship with the Premier League, to form or promote inappropriate relationships with Children or Adults at Risk



Use their position to gain access to information about Children and Adults at Risk for personal or others' advantage



Share or request personal information with or from Children or Adults at Risk, including contact via phone, email, messaging services, or social media. Any online or electronic communication with Children or Adults at Risk must be justified and take place solely through platforms approved by the Safeguarding and IT teams. This ensures transparency and protects all parties from harmful, inappropriate, or unsupervised interactions.



Use personal or work-issued devices (unless required by their role) to photograph or record Children or Adults at Risk involved in our Activities, and must not publish such media on personal social media accounts or public forums, except when reposting publicly available content, such as articles or media published through official Premier League channels



Engage in any form of sexual activity (contact or non-contact) with a Child or Adult at Risk, or discuss such activities in their presence, including through suggestive conversations and comments



Carry out duties under the influence of alcohol, solvents, or illegal substances



Use Premier League equipment to access pornography or access it on personal devices when on duty



Access, create, or distribute illegal or indecent content or images



Safer recruitment

Our commitment to Safeguarding includes implementing robust safer recruitment procedures to prevent unsuitable individuals from working with, having access to, or exerting influence over Children and Adults at Risk. Safer recruitment refers to the steps within our recruitment and selection processes designed to prevent unsuitable individuals from being appointed to roles involving access to Children and/or Adults at Risk. Workforce Members are expected to familiarise themselves with, and adhere to, our Recruitment and Selection Policy and Procedures. In addition, attending regular safer recruitment training is mandatory for:

- Workforce Members involved in the recruitment and selection process for paid or voluntary roles that provide access to Children and/or Adults at Risk
- Workforce Members procuring services that involve access to Children and/or Adults at Risk through our Activities
- The People and Safeguarding teams
- Safeguarding Champions

Engaging Prominent Individuals

Our Safeguarding expectations apply to everyone who attends or contributes to our Activities in any capacity, including Prominent Individuals. We are committed to ensuring that their presence and contributions reflect our values, are age-appropriate, and do not expose Children or Adults at Risk to inappropriate or harmful interactions or influences. This includes, for example, risks arising from their public profile, messaging (including the promotion of misinformation), the services or products they endorse, or their associations with causes, individuals, or content that may convey age-inappropriate messages, encourage harmful behaviours, attitudes, or beliefs, or promote unrealistic lifestyle standards or harmful body image.

Workforce Members must ensure that no Prominent Individual has contact with, or the opportunity to influence, Children or Adults at Risk in any Activity unless due diligence has been conducted in collaboration with the Safeguarding team, a contractual or contributor agreement is in place, and that all pre-Activity service delivery or contribution requirements have been fulfilled.



Procurement

We are committed to delivering the highest standards of care and protection for Children and Adults at Risk, and we expect the same from partners and service providers. To ensure alignment with this commitment, we carry out due diligence proportionate to each prospective partner's or service provider's core business activities, the services to be delivered and the associated Safeguarding risks. Where gaps are identified, we adopt a collaborative, capability-strengthening approach to enhance Safeguarding measures, mitigate risks, and ensure obligations are met. For individual service providers, such as consultants and workers, Workforce Members must work with the Safeguarding team to ensure that all required vetting checks are completed to assess their suitability before they participate in or contribute to any Activities.

Workforce Members are expected to:

- Proactively communicate our Safeguarding commitment and expectations to prospective partner organisations and service providers
- Submit a contract request for any prospective partner organisation or service provider where services carry Safeguarding risk, particularly where services provide access to Children or Adults at Risk
- Ensure that the Safeguarding team has completed all required due diligence checks, that a fully executed contract is in place, and that any necessary training or other pre-service delivery requirements have been fulfilled
- Ensure that any service delivery restrictions or conditions are adhered to

Activities

Workforce Members have a duty to promote and protect the safety and welfare of Children and Adults at Risk, especially when they attend or participate in any in-person or online event, or engage with any product, service, or content delivered, commissioned, or endorsed by the Premier League. Workforce Members must ensure that Safeguarding measures are integrated from the outset, with sufficient notice, by working closely with the Safeguarding team. This includes, but is not limited to, embedding Safeguarding considerations into RFPs, tender processes, prospective partner due diligence, risk assessments, commissioning briefs, planning, delivery, and review stages.

Workforce Members must familiarise themselves and comply with our Creating Safe Experiences Guidance.



Preventing online harm

It is important to be aware of potential online risks faced by Children and Adults at Risk, including, but not limited to:

Content	Contact	Conduct	Commerce
Online environments can contain harmful or inappropriate content, including pornography (such as AI-generated or deepfake material), misinformation, disinformation, fake news, and conspiracy theories. Other risks include exposure to racist, misogynistic, anti-Semitic, or otherwise hateful material; content that promotes or glorifies self-harm, suicide, or suicidal ideation; and material that encourages or normalises drug use, criminal activity, or violence. Additional concerns include radicalisation, extremist content, harmful online challenges or hoaxes, and cruelty towards humans or animals. Content that glamorises or trivialises sexual abuse, exploitation, or rape is also a serious risk. These dangers are heightened where digital safeguards or filtering systems are weak or absent, allowing access to unfiltered and age-inappropriate material.	Online interactions can present various risks, including peer-to-peer pressure, grooming, and exploitation or coercion for sexual, criminal, financial, or ideological purposes. These risks may involve contact from adults posing as peers or individuals using deceptive or manipulative identities. Unsolicited or persistent communication, including threats, intimidation, or harassment, further contributes to contact-related harms. Additional risks include exploitative commercial advertising and attempts to obtain personal, financial, or sensitive information through deception, manipulation, or coercive tactics.	Certain online behaviours can increase the likelihood of harm. These include the creation, sharing, or receipt of explicit or sexual content, including the consensual or non-consensual distribution of nude, semi-nude, or explicit images and videos. Engaging with or distributing pornographic material, participating in online bullying, harassment, or abusive behaviour, and sharing or reposting offensive content all present significant risks. Additional concerns include oversharing personal information, engaging in harmful online trends, digital abuse, and making poor digital choices that can lead to long-term reputational damage and increased vulnerability to exploitation.	Commercial risks involve financial exploitation in online environments. These include exposure to gambling, betting, and gaming systems with gambling-like features such as loot boxes, along with aggressive or inappropriate advertising tactics. Other risks include phishing, scams, identity theft, and fraudulent schemes. Deceptive or manipulative marketing strategies that encourage unnecessary spending also fall within this category. Additional concerns arise from platforms or services designed to collect personal or financial data for commercial gain, often without informed consent or transparency.

Workforce Members must familiarise themselves and comply with our Creating Safe Experiences Guidance when planning delivery or development of any online Activities.



Selection, rewards and gifts

It is important to avoid perceptions of favouritism or unfairness when selecting Children and Adults at Risk for activities, privileges, or rewards. Selection methods and criteria should always be transparent, fair, and consistently applied. Care should also be taken to avoid giving or accepting gifts that could be construed as attempts to bribe, groom, or expect preferential treatment.

Workforce Members are expected to:

Ensure methods of selection and exclusion are fair, transparent and consistently applied

Avoid any selection method, reward, or gifting methods that favour or disadvantage any Child or Adult at Risk

Ensure gifts are given or received in accordance with Premier League policies and procedures

Never use their position or influence, or provide any item, gift, or opportunity available to them through their relationship with the Premier League, to form or promote inappropriate relationships with Children or Adults at Risk



Lone working and one-to-one situations

A lone worker is someone engaged in an Activity that places them in a situation without direct contact with colleagues or without direct supervision.

Workforce Members are expected to:

Adhere to Premier League policies and procedures, as well as any role-specific or Activity risk assessments

Work in an open and transparent manner, and avoid any conduct that could harm Children or Adults at Risk, or call into question their suitability to work with them

Ensure that any meetings or contact with Children or Adults at Risk take place only with the knowledge and agreement of our Safeguarding team

Workforce Members must not visit the homes of Children and Adults at Risk they encounter through their role, except as part of agreed work arrangements. Additionally, they must not invite Children and Adults at Risk to their own home or to the home of a family member, colleague, or friend.



Physical contact

Physical contact should only occur when necessary, for example, for medical intervention, preventing injury, or supporting a Child or Adult at Risk to safely perform an activity. When physical contact is necessary, permission should be sought, the reason explained, and the Child or Adult at Risk's wishes respected.

Physical contact should never be secretive, intended for the gratification of a Workforce Member, or represent an abuse of their position, influence, or authority.

If a Workforce Member believes that their actions, or those of a colleague, could be misinterpreted, or if they observe an action that may be abusive or inappropriate, the incident and circumstances must be reported to our Safeguarding team without delay.

Examples of acceptable physical contact:



Celebrating success with a handshake or high five



Offering reassurance by placing a hand on the upper back or arm – never make assumptions about whether a Child or Adult at Risk wants physical contact



Demonstrating safe equipment use or aiding sports instruction using verbal directions first, explaining and seeking consent where physical contact may be necessary



Preventing injury or accidents



Administering first aid



Examples of unacceptable physical contact:



Touching areas such as chest, breasts, waist, thighs, genital areas, or buttocks



Using physical force to enforce instructions or manage challenging behaviour



Assisting with personal care



Concealing abuse under the guise of medical treatment or tests



Engaging in any form sexual activity with a Child or Adult at Risk



Protection

Safeguarding is a collective responsibility that requires everyone to be alert, proactive, and committed to ensuring the safety and wellbeing of Children and Adults at Risk. Protecting them from harm cannot be done in isolation - it relies on strong collaboration, effective communication, and the timely sharing of information. When concerns are raised and addressed appropriately, risks can be identified early, support can be provided, and potential harm can be prevented.

No concern is too small to report, and working together strengthens our ability to safeguard those at risk.

Duty to report

Workforce Members have a duty to report any information they become aware of, including low-level concerns, disclosures of abuse, witnessed incidents, or behaviours and acts of omission that may have compromise the rights, safety, or welfare of any Child or Adult at Risk.

The Premier League will fully support anyone who, in good faith, raises a Safeguarding concern. There will be no detrimental treatment for reporting a genuine concern.

01 Recognise

Recognise potential signs of abuse and low-level concerns



02 Respond

Seek medical attention if necessary and if you believe there is an imminent and significant risk of harm to anyone, call 999



03 Report

Notify the Safeguarding Team promptly and maintain strict confidentiality



04 Record

Record the information using the referral form available via the Safeguarding Hub on the Staff Intranet

Safeguarding is everyone's responsibility - if in doubt, speak to our Safeguarding team for guidance

Escalation and whistleblowing

If a Workforce Member believes that a Safeguarding concern has not been responded to appropriately, they should share their concerns with our General Counsel or via our Whistleblowing Policy.



Self-reporting

Self-reporting demonstrates integrity and contributes to maintaining a culture where everyone aspires to the highest standards of practice and behaviour. Safeguarding is built on trust, transparency, and accountability. From time to time, a Workforce Member may find themselves in a situation which might appear compromising to others or which could be misconstrued. Equally, they may, for whatever reason, have behaved in a manner which, on reflection, falls below expected standards. Self-reporting in these circumstances is encouraged as it demonstrates both awareness of expectations, and self-awareness regarding their own actions or how these might be perceived.

Duty to self-report

Workforce Members whose roles bring them into contact with Children and/or Adults at Risk must immediately notify our Safeguarding team if they are placed under investigation (criminal or otherwise) or subject to any enquiry regarding alleged conduct or an act of omission that may have compromised the safety or welfare of a Child or Adult at Risk. This includes a Workforce Member's behaviour in their private life or another setting. Non-exhaustive examples of such situations include: grooming or inappropriate communications (e.g., texts, emails, images); exchanging gifts or socialising in an inappropriate context with Children or Adults at Risk; possession of indecent or pseudo-photographs; involvement in Child protection processes as a parent; failure to report known Safeguarding concerns; breach of a position of trust; and any relevant alleged criminal offences, such as sexual offences, violence, weapons, drugs, human trafficking, or modern slavery.

Self-reporting is not about judgment; it is about ensuring that any potential risks are properly assessed and managed. While some behaviours may not constitute a criminal offence, and some may not reach the threshold of significant harm, the Premier League will in each case consider whether any of its policies and procedures have been breached and undertake a risk assessment to identify and manage any potential Safeguarding risks.



Responding to disclosure

It takes extraordinary courage for someone to disclose abuse, and it is essential that they are taken seriously, with appropriate action taken to support and protect them and others who may be at risk.

In the moment	It is important to avoid	Post disclosure action
• Listen attentively and without interruption, offering reassurance and support, but without asking investigative questions • Acknowledge their courage and the difficulty of sharing their situation • Reassure them that abuse is never justified and is not their fault • Limit questioning to what is necessary for clarification • Validate their feelings and what they've shared • Explain the actions you will take and reassure them that they will be supported, and that information will only be shared on a need-to-know basis to protect them and others who may be at risk. Full details may not always be appropriate depending on their age, understanding, or if doing so may increase the risk of harm to them or others	• Pressuring them to disclose more than they are willing to share • Asking leading questions • Using victim-blaming language • Asking them to adjust their clothing to observe any bruises or injuries • Making promises of confidentiality • Documenting the conversation while they are disclosing - this should be done after the person's immediate needs have been met and our Safeguarding team has been notified • Approaching the alleged perpetrator	• Seek medical attention if necessary and if you believe there is an imminent and significant risk of harm to anyone, contact the police by calling 999 • Notify our Safeguarding team and maintain confidentiality. Confidentiality breaches may compromise the safety of Children and Adults at Risk and undermine the integrity of internal or external enquiries and investigations. Any improper disclosure of information by a Workforce Member will be treated seriously and may result in disciplinary action • Record the information using our referral form, accessible through the Safeguarding Hub on the Staff Intranet



Recording

Good record keeping is essential Safeguarding practice. When recording information, Workforce Members are expected to:

- Provide detailed and factual information rather than assumptions or opinions
- Avoid rephrasing what they have been told – record actual words and language
- Avoid using jargon, acronyms and abbreviations
- Clearly distinguish between first-hand information and information from third parties
- Ensure the information is clear and unambiguous to prevent misinterpretation
- Document any actions they've taken and the rationale behind them

Records may be used in internal or external investigations and enquiries, criminal or court proceedings, and disciplinary proceedings.

Wellbeing support

We recognise that dealing with a Safeguarding concern can affect the wellbeing of everyone involved. While we will ensure that affected individuals have access to appropriate workplace and wellbeing support, it is also important to seek additional help if needed. No one should have to manage these experiences alone. Whether you need guidance, reassurance, or simply someone to talk to, support is available. Speak to the People or Safeguarding team for further information.

Employees can access information about mental health and wellbeing support via the Staff Intranet.



Response

Information brought to our attention concerning the safety and welfare of a Child or Adult at Risk or a Workforce Members actions or inaction will be responded to in accordance with the Premier League's Safeguarding Concern and Allegation Management Procedures.

Information may be shared with relevant stakeholders, such as statutory agencies and The FA, based on an assessment of potential or actual harm, and in accordance with our statutory and regulatory obligations.

The Premier League has a duty to notify The FA if an Affiliated Individual (which includes Workforce Members) is alleged to have (whether in the workplace, their personal life, or another setting):

- Harmed or abused a Child or an Adult at Risk
- Committed a sexual offence, regardless of whether the alleged victim is a Child or an Adult at Risk
- Been subject to a third or subsequent substantiated low-level concern

The FA may impose Safeguarding measures in accordance with its regulations and may retain relevant information, which could be referred to and considered should any future concerns arise.



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