



## GILLINGHAM FOOTBALL CLUB LTD

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Managing Low Level Concerns and Allegations  
Safeguarding is EVERYONE'S Responsibility



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Registered no. 39175 England





# GILLINGHAM FOOTBALL CLUB LTD

Gillingham FC is committed to the safeguarding and promoting the welfare of children, young people and adults at risk and expects all staff, volunteers and visitors to share this commitment. Safeguarding is everyone's responsibility.

Gillingham Football Club is committed to providing an enjoyable and safe environment for children and young people where the wellbeing of the child or young person is paramount, and they are protected from abuse.

Gillingham FC recognises that a critical step to safeguarding is to ensure that all those who work with children and young people behave appropriately, and that any concerns about an adult's behaviour are identified early, and are then managed promptly and appropriately.

The aim of this policy is to support a culture whereby concerns (no matter how small those concerns may be) about an adult's behaviour that may fall below the expected standards of our Employee Policies and Procedures in the employee handbook, including the Code of Conduct, can be shared responsibly with the appropriate person and be dealt with promptly and appropriately.

Gillingham FC is committed to ensuring that safeguarding is person-led and outcome-focused. We believe that children and adults at risk have the right to be heard and involved in decisions that affect them. We will strive to respond to their safeguarding situation in a way that enhances involvement, choice, and control, as well as improving wellbeing and safety.

In the absence of consent from an individual making a disclosure or to who the information relates, we will take proportionate action that will reduce the risk of harm. This may include acting or sharing information, where there is a necessary duty to do so for safeguarding purposes.

Gillingham FC take all allegations seriously, and will support anyone, who in good faith, reports their concerns that a colleague or supporter may be abusing a child or adult, even if that concern is proved to be unfounded. The following guidelines are relevant whether the child or young person is involved in football or not.

## **YOUR ROLE AT GILLINGHAM FC WILL NEVER BE AT RISK FOR SPEAKING UP ABOUT A CONCERN.**

Safeguarding children is the action taken to promote the welfare of children and to protect them from harm. Safeguarding adults means protecting an adult's right to live in safety, free from abuse and neglect.

Throughout this policy, we will refer to children, or a child being under the age of 18, and adults being aged 18+. The exception to this is if you are an Academy u18 player, and therefore we will follow the policies and procedures that we have in place to protect children.

There are many factors which can determine the outcome when dealing with a safeguarding concern; therefore, the action taken is determined case by case. The following information will set out how safeguarding concerns are managed, the roles of the stakeholders when managing an allegation, and the thresholds for referrals.

Gillingham FC are committed to working in partnership with the EFL, FA and other key partners to provide welcoming and inclusive environments where children and adults are safe, valued, and respected. This includes taking action or sharing information where necessary to protect the safety and wellbeing of children and adults at risk, and to strengthen safeguarding arrangements across the game.

All information relating to safeguarding incidents or concerns are disseminated on a 'need to know' basis. Those who need to know are those who have a role to play in protecting children and adults at risk. For example:





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- Designated persons (those with specific operational responsibility for safeguarding, for example the Senior Safeguarding Manager, or Designated Safeguarding Officer.)
- Statutory authorities (Police and Local Authorities)
- The Disclosure and Barring Service (DBS) who help employers make safer recruitment decisions and stop unsuitable people from working with children and adults at risk.
- Football Authorities, such as the EFL and FA.

Once a concern/allegation has been reported, the safeguarding team will quickly triage into the following areas.

Please see the next overleaf.



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Level	Critically	Impact
1	Most Severe	High
2	Severe	High
3	Medium	Med-Low
4	Low	Low

**SHOULD A CHILD OR ADULT BE AT IMMEDIATE RISK OF HARM, PLEASE CONTACT THE POLICE ON 999, THEN CONTACT YOUR SAFEGUARDING TEAM WITHIN 1 HOUR.**

**FAILURE TO REPORT A CONCERN WITHIN THE BELOW TIMESCALES WITHOUT GOOD REASON, OR TO COMPLY WITH AN INVESTIGATION CAN PUT YOUR PLACE WITHIN OUR CLUB AT RISK.**

Timescales for reporting are as follows:

Level	GFC Safeguarding Team	Police/Local Authority	FA	EFL	Record Via MyConcern
1	Within 1 hour	999 immediately /Childrens services or adult services to be notified immediately by safeguarding team.	SSM to make FA referral within 1 hour.	EFL duty on call to be advised within an hour	Within 1 hour
2	Within 1 hour	999 immediately where necessary Children's/Adult services to be notified immediately by safeguarding team	SSM to make referral within 1 hour	EFL duty on call to be advised within an hour	Within 1 hour
3	Within 24 hours	SSM will make contact if required following an internal enquiry	Will be referred by the SSM if required following an internal enquiry	EFL to be advised if required by the SSM following an internal enquiry	Within 24 hours
4	Within 24 hours	Will be notified by SSM if required following initial internal enquiry	Will be referred by the SSM following an internal enquiry	EFL to be advised if required by the SSM following an internal enquiry.	Within 24 hours





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All safeguarding concern information is held on our safeguarding software – My Concern, until a time when the information may no longer be deemed necessary to store. My Concern is a cloud-based software which is password protected and accessible by those working within the Club. Concerns are only accessible by the staff member reporting them, and the safeguarding team, hence on a ‘need to know’ basis. This information can be shared with relevant stakeholders and key partners in relation to the wellbeing and safety of a child or adult at risk.

Gillingham FC is also duty bound to report to the DBS when we as an employer have removed or dismissed a person from working with adults or children, (or would have been if they had not left, resigned, retired, been made redundant or moved to another position) because the person has:

- Been cautioned or convicted for a ‘relevant offence’
- A ‘relevant offence’ for the purpose of referrals to the DBS is an offence that would result in the individual’s automatic inclusion in the children’s or adult’s barred list.
- Engaged in ‘relevant conduct’
- ‘Relevant conduct’ is that which endangers or is likely to endanger children or adults at risk
- Satisfied the harm test

The harm test is met when an employer believes that an individual may harm, may cause to be harmed, may put at risk of harm, may attempt to harm, or may incite another person to harm a child or adult at risk. Referrals to the DBS should be made once all investigations and disciplinary actions are complete (even if the person has left employment). Referrals must be made even if a significant period has passed between the allegation and the gathering of evidence to support a decision to make a referral. This information may then show on an individual’s future DBS certificate as softer intelligence, relevant to the role that they may be applying for.

All low-mid level concerns will be managed by Gillingham FC’s safeguarding team, with support from relevant external stakeholders and key partners, with appropriate action taken in line with guidance.

This could result in:

- An internal investigation
- Suspension
- Unfounded/no further action required
- Formal disciplinary procedures
- Disciplinary sanction
- Training, mentoring/supervision, and support
- Dismissal
- More significant concerns could emerge during internal processes that require DBS, statutory, and/or a Football Authority referral



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### Should the concern need to escalate to the Football Authority, the EFL will:

- Provide support and guidance
- Have oversight and work with Gillingham FC to ensure that internal procedures and football regulations are followed
- The Club led investigation is shared with the football authorities
- Joint football authority and club investigation
- Joint EFL/FA investigation
- Independent case review (possibly in conjunction with the FA)
- Sanctions against clubs where EFL rules have been breached
- Work with the club to ensure that learning outcomes are implemented to mitigate the risk of recurrence
- Share anonymised learning from cases to strengthen safeguarding provision

### The FA will:

- Investigate
- Risk assess to determine whether the individual poses or may pose a risk of harm
- Training, mentoring or supervision order
- Interim or permanent suspension

Should you be a supporter who has posed a risk of harm to a child or adult at risk, you may be at risk of the following:

- A club investigation
- Removal from volunteering activities
- Referral to the police and local authorities
- Referral where necessary to the DBS service
- A banning order

Should any of the allegations or concerns need intervention under section 47 of the Children's Act 1989, any internal investigation at Gillingham FC will be put on hold until the investigation is complete. During that time, we will be unable to share the outcome of the investigation as we also have a duty of confidentiality to the person being investigated.

### What should I do if I receive a concern?

- React calmly so as not to alarm the child or adult who is disclosing to you
- Tell the person that he or she is not to blame and that they have done the right thing by talking to someone
- Always treat concerns and allegations seriously; it is not up to you to decide if they are telling the truth
- If the child or adult at risk needs immediate medical treatment, if trained, please administer first aid, and ask a





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colleague to telephone emergency services on 999 for an ambulance and the police if the child/adult is at immediate risk. Always (if this does not place the child/adult at further risk) contact the parents/carers/next of kin. If no medical transport is available, please ensure that you are accompanied by another member of staff, and take the person directly to hospital, if this is in their best interests. Inform doctors of the safeguarding concerns and ensure that they are aware that this is a child protection or adult at risk issue.

- If the child/adult has named the parent/carer/next of kin as the abuser, then please contact the police and the Senior Safeguarding Officer.

If they are not available, please contact the children/adult services team out of hours contact.

- Always ensure the immediate safety of the young person/adult. If you are not sure what to do, please call the Senior Safeguarding Officer.

- When receiving a disclosure, it is vital that you document in the person's own words what has been said using pen and paper or the Club's My Concern safeguarding software and make a note of any actions that you have taken as a result of the disclosure

- Please do not use leading questions, instead use TEDs PIE:

- Tell Me

- Explain for me

- Describe for me

- Show Me

- Precisely

- In Detail

- Exactly

Please keep any questions to the absolute minimum, asking only what is necessary to ensure a clear understanding of what has been said.

- Re-assure the child or adult, but do not make promises of confidentiality or outcome, which might not be feasible considering subsequent developments.

- In the event of suspicion of sexual abuse, do not let the person bathe or shower until given permission to do so. Washing can destroy vital evidence.

Peer on peer abuse must be dealt with by normal protection procedures. Any such allegation should be reported immediately to the Senior Safeguarding Officer, who will in turn liaise with the Club and relevant authorities such as Children's Services and the EFL as to whether the alleged abuser should continue with the Club activities because of the risk they may pose to others.

If the child or adult is at immediate risk, please do contact the police immediately on 999.

Employees may be worried that by reporting such issues they will be opening themselves up to victimisation,





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detriment or risking their job security. However, all staff are protected by law if they raise concerns in the right way. Provided they are acting in good faith, it does not matter if they are mistaken.

By knowing about malpractice at an early stage, Gillingham FC stands a good chance of taking the necessary steps to safeguard the interests of all staff and protect the organisation. In short, please do not hesitate to 'blow the whistle' on malpractice. The policy is designed to ensure employees, volunteers, supporters, and all players raise concerns properly and to ensure that the mechanisms exist in the Club, whereby issues raised will be dealt with quickly and effectively. The policy also sets out the legitimate course of action, which can be taken to raise issues with parties outside of Gillingham FC if an issue is not addressed by the Club, or it is felt that by raising it internally may lead to evidence of malpractice being concealed.

The purpose of the policy is to outline how we may deal with concerns and/or service provision which may have an impact or threaten the wider public interest. The policy is applicable to all Gillingham FC staff (including scholars), volunteers, academy, and players.

To ensure that complaints that contain safeguarding issues are centrally recorded and actioned appropriately, the following procedures have been agreed:

- If any safeguarding disclosure is received which states a complaint is running alongside a safeguarding investigation, the safeguarding officer will notify the senior management team of the complaint.
- If appropriate, the safeguarding officer will send copies of the minutes of the relevant meetings, plans, agreed upon next steps and conclusion with the relevant people using the Club's safeguarding software.
- Safeguarding disclosures which identify they have been closed as a referral should be treated as a complaint not a safeguarding issue. The safeguarding officer will notify the senior management team of the information received and decide who will manage the complaint.
- The safeguarding officer will work with the senior management team in the formulation of any letters that are required to be sent.
- Should the complaint be about a member of the senior management team, the safeguarding officer will liaise with the LADO/EFL/FA for the best course of action along with the Board of Directors, led by the Board's safeguarding champion.
- Should the complaint be about a member of the safeguarding team, then please either contact the Senior Safeguarding Officer or Chief Operations Officer. Complaints raised with the safeguarding officer which potentially have safeguarding issues, will check if there is a need to alert services regarding safeguarding issues.

Any complaints received, direct to or from the Club relating to coaching practice may also need to be referred to the safeguarding officer and/or the Football Association Case Management Team as required.







# GILLINGHAM FOOTBALL CLUB LTD

## Important Contacts

**Safeguarding Board Champion** – Shannon Gallinson – [safeguarding@priestfield.com](mailto:safeguarding@priestfield.com)

**Senior Safeguarding Officer** – Geoff Wellard – [Gwellard@priestfield.com](mailto:Gwellard@priestfield.com)

**Designated Safeguarding Officer (DSO) Academy** – Asif Rasheed – [Arasheed@priestfield.com](mailto:Arasheed@priestfield.com)

**Gillingham FC Director of Operations** – Joe Comper – [enquiries@priestfield.com](mailto:enquiries@priestfield.com)

**Stadium Safety Officer** – Gary Newman – [Gnewman@priestfield.com](mailto:Gnewman@priestfield.com)

### EFL Regional Safeguarding Manager

Darren Green - [Dgreen@efl.com](mailto:Dgreen@efl.com)

**Kent City Council Local Authority Designated Officer (LADO)** Hollie Priestley 03000 410 888. [kentchildrensLADO@kent.gov.uk](mailto:kentchildrensLADO@kent.gov.uk)

**Kent Safeguarding and Inclusion Officer:** [bianca.logronio@kent.gov.uk](mailto:bianca.logronio@kent.gov.uk) 03000 412140

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**Police** Tel: 999 in an emergency Tel: 101 non emergencies

**NSPCC Email:** [help@nspcc.org.uk](mailto:help@nspcc.org.uk) Tel: 0808 800 5000

**Childline** Tel: 0800 1111

**Ann Craft Trust** Tel: 0115 9515400

**Kidscape** Email: [parentsupport@kidscape.org.uk](mailto:parentsupport@kidscape.org.uk) Tel: 07496 682785 – WhatsApp



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