

 OXFORD UNITED IN THE COMMUNITY <small>REGISTERED CHARITY NO. 1125173</small>	Policy Name - Safeguarding Policy	
	Policy Number - OUITC-SAF-001	
	Date: Feb-26	Version 1.1
	Owner: Chris Lowes	Reviewer: Board/Jack Nield
	Review Date: Jun-26	Review Cycle: Annual or any significant incident

1. Policy Statement & Objectives

Oxford United in the Community (OUitC) is committed to providing safe, inclusive and positive environments where all beneficiaries feel protected from harm, respected and supported to thrive. Safeguarding is central to our organisational purpose and is embedded into leadership, culture and delivery.

OUitC recognises that safeguarding is the responsibility of everyone and not just those in specialist roles. We adopt a proactive and preventative approach, working in partnership with Oxford United Football Club, delivery partners, statutory agencies and funders to promote welfare and reduce risk.

OUitC is committed to:

- Preventing abuse, neglect, exploitation and radicalisation before it occurs.
- Responding quickly, appropriately and proportionately to all safeguarding concerns.
- Creating a culture where safeguarding is openly discussed, understood and prioritised.
- Ensuring children, young people and adults at risk are listened to and believed.
- Supporting staff and volunteers to act confidently and correctly.
- Learning from incidents and continually improving safeguarding practice.

2. Scope

This policy applies to:

- All trustees, employees, volunteers and sessional staff.
- Contractors, consultants and agency staff.
- Partner organisations delivering on behalf of OUitC.
- Anyone who comes into contact with OUitC through its activities.

The policy covers safeguarding responsibilities relating to:

- Children (anyone under 18).
- Young people.
- Adults at risk.
- Families, carers and the wider community where there is a safeguarding impact.

Safeguarding applies across all settings including schools, community venues, football facilities, prisons, online environments and off-site trips.

3. Legal & Regulatory Framework

OUIc operates in accordance with all relevant safeguarding legislation and guidance, including but not limited to:

- Children Act 1989 and 2004
- Care Act 2014
- Working Together to Safeguard Children
- Keeping Children Safe in Education (where applicable)
- Charity Commission safeguarding guidance
- DCMS safeguarding guidance
- FA, EFL and Premier League safeguarding standards
- Prevent Duty guidance
- Data Protection Act 2018 and UK GDPR

This policy is reviewed and updated to reflect changes in law, guidance and sector expectations.

4. Leadership, Governance & Culture

4.1 Board Responsibility

The Board of Trustees holds ultimate accountability for safeguarding. The Board ensures:

- A named Safeguarding Trustee is appointed.
- Safeguarding is a standing agenda item at Board meetings.
- Trustees receive safeguarding training appropriate to their role.
- Anonymised safeguarding data and trends are reviewed regularly.
- Serious incidents are scrutinised and learning applied.
- Sufficient financial and human resources are allocated to safeguarding.
- A Safeguarding Action Plan is approved and monitored.

Trustees actively promote a safeguarding culture and challenge where standards are not met.

4.2 Safeguarding Review

OUIFC undertakes an annual safeguarding review which considers:

- Internal safeguarding data and trends.
- Risk assessments and emerging risks.
- Compliance with legislation and football guidance.
- Feedback from beneficiaries, staff and partners.
- Learning from incidents, near misses and complaints.
- Changes to delivery model or organisational structure.

Additional reviews are triggered by:

- Serious incidents or allegations.
- Significant policy or legal changes.
- Expansion into new delivery areas.

Findings are reported to the Board with clear actions and timescales.

5. Roles & Responsibilities

5.1 Designated Safeguarding Lead (DSL)

The DSL is responsible for:

- Implementing and monitoring safeguarding policy and procedures.
 - Acting as the main point of contact for safeguarding concerns.
 - Maintaining oversight of all safeguarding cases.
 - Ensuring appropriate referrals are made to statutory agencies.
 - Liaising with Oxford United FC safeguarding leads.
 - Providing advice and support to staff and volunteers.
 - Maintaining safeguarding records and secure storage.
 - Coordinating training and development.
 - Producing reports for senior management and the Board.
 - Leading on serious incident reporting to the Charity Commission.
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5.2 Managers

Managers are responsible for:

- Embedding safeguarding into day-to-day operations.
 - Ensuring staff comply with safeguarding procedures.
 - Identifying and managing risks within their programmes.
 - Supporting staff in managing safeguarding concerns.
 - Monitoring conduct and professional boundaries.
 - Ensuring safeguarding is included in supervision and planning.
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5.3 Staff & Volunteers

All staff and volunteers must:

- Understand and follow this policy and related procedures.
- Complete required safeguarding training.
- Report concerns immediately to the DSL.
- Maintain professional conduct and boundaries.
- Treat all beneficiaries with dignity and respect.
- Challenge unsafe or inappropriate behaviour.
- Promote inclusion and wellbeing.

Failure to follow safeguarding procedures may result in disciplinary action.

6. Prevention – Policies & Practice

Oxford United in the Community (OUitC) maintains a comprehensive framework of safeguarding policies and safe practice guidance to prevent harm, reduce risk and promote welfare across all activities.

6.1 Definitions of Abuse, Neglect and Exploitation

OUitC recognises that abuse can take many forms and may occur in any setting. Abuse may be:

- Physical abuse
- Emotional or psychological abuse
- Sexual abuse
- Neglect
- Financial abuse
- Discriminatory abuse

- Organisational abuse
- Online abuse
- Radicalisation and exploitation

Staff and volunteers are trained to recognise signs and indicators of abuse and understand that abuse may be perpetrated by adults, peers or those in positions of trust. All concerns, regardless of perceived seriousness, must be reported.

6.2 Codes of Conduct for Staff, Volunteers and Participants

OUIc has clear Codes of Conduct which:

- Define expected standards of behaviour and professionalism.
- Promote respectful, inclusive and appropriate interactions.
- Prohibit physical punishment, humiliation, intimidation or inappropriate language.
- Set boundaries around physical contact, communication and relationships.
- Require staff to act as positive role models.
- Clarify acceptable and unacceptable behaviour.
- Outline consequences for breaches of conduct.

Participants are supported to behave respectfully and safely towards others.

6.3 Safer Working Practices

OUIc implements safer working practices to reduce risk and protect both beneficiaries and staff, including:

- Avoiding one-to-one situations where possible or ensuring visibility.
- Never transporting children alone without authorisation.
- Using appropriate ratios of staff to participants.
- Ensuring sessions are supervised at all times.
- Avoiding unnecessary physical contact and ensuring it is appropriate when required (e.g. first aid, coaching).
- Ensuring appropriate changing room arrangements.
- Prohibiting personal relationships with participants.
- Ensuring professional boundaries are maintained at all times.

6.4 Online Safety and Digital Conduct

OUIitC recognises the risks associated with digital and online environments and:

- Prohibits staff from communicating with participants via personal social media or messaging apps.
- Uses approved platforms for communication.
- Ensures parental consent is obtained for digital engagement.
- Provides guidance on appropriate digital behaviour.
- Monitors online platforms used for delivery.
- Responds to concerns about cyberbullying, grooming or inappropriate content.
- Educates participants on staying safe online where relevant.

6.5 Peer-on-Peer Abuse

OUIitC acknowledges that children can abuse other children. This includes:

- Bullying and cyberbullying.
- Sexual harassment or violence.
- Physical harm.
- Initiation or hazing behaviour.
- Coercion or exploitation.

OUIitC:

- Treats all peer-on-peer abuse as a safeguarding concern.
- Responds promptly and proportionately.
- Supports victims and manages behaviour of those causing harm.
- Engages parents/carers and partner organisations.
- Makes referrals where thresholds are met.
- Records all incidents.

6.6 Mental Health and Wellbeing

OUIitC recognises the connection between mental health and safeguarding and:

- Promotes a culture of openness around mental health.
- Trains staff to identify signs of distress or risk.

- Responds to self-harm or suicidal ideation as safeguarding concerns.
 - Works with external services where required.
 - Ensures reasonable adjustments for vulnerable participants.
 - Supports staff wellbeing to reduce risk.
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6.7 Risk Assessment (Activities, Venues and Individuals)

OUIitC:

- Conducts risk assessments for all programmes.
 - Includes safeguarding risks within activity risk assessments.
 - Considers venue suitability and supervision levels.
 - Identifies individual participant risks (e.g. medical needs, SEND, behaviour).
 - Reviews risk assessments regularly and following incidents.
 - Ensures staff understand and follow risk controls.
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6.8 Photography, Filming and Consent

OUIitC:

- Obtains written consent for photography and filming.
 - Clearly explains how images will be used.
 - Prohibits staff using personal devices for photography.
 - Ensures images are stored securely.
 - Avoids identifying children by name in publications.
 - Responds to objections or withdrawal of consent.
 - Uses images respectfully and appropriately.
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6.9 Complaints and Whistleblowing

OUIitC:

- Provides clear routes to raise concerns or complaints.
- Allows concerns to be raised anonymously.
- Protects whistleblowers from retaliation.
- Investigates complaints fairly and promptly.
- Escalates safeguarding-related complaints appropriately.

- Ensures complainants are informed of outcomes where possible.
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6.10 Low-Level Concerns

OUIitC recognises the importance of reporting behaviour that may not meet the threshold for abuse but may indicate emerging risk. This includes:

- Inappropriate language.
- Boundary issues.
- Poor judgement.
- Policy breaches.

OUIitC:

- Encourages reporting of low-level concerns.
 - Records and monitors patterns.
 - Takes early action.
 - Provides guidance or training where needed.
 - Escalates if behaviour worsens.
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6.11 Recording, Reporting and Information Sharing

OUIitC:

- Uses secure systems for recording safeguarding concerns.
 - Ensures records are factual and timely.
 - Shares information on a need-to-know basis.
 - Follows statutory guidance on data sharing.
 - Retains records in line with GDPR.
 - Maintains confidentiality while prioritising safety.
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6.12 Contingency and Crisis Planning

OUIitC plans for emergencies and safeguarding crises by:

- Having emergency response procedures.
- Ensuring staff know escalation routes.
- Identifying deputies for key safeguarding roles.
- Planning for serious incidents.

- Maintaining contact details for statutory agencies.
 - Reviewing crisis responses after incidents.
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7. Safer Recruitment

OUIitC follows safer recruitment processes to reduce the risk of unsuitable individuals working with vulnerable groups:

- Clear role descriptions with safeguarding responsibilities.
 - DBS checks at the appropriate level.
 - Identity and right-to-work checks.
 - Minimum of two references.
 - Safeguarding-based interview questions.
 - Induction training prior to delivery.
 - Probation periods and supervision.
 - Ongoing performance and conduct monitoring.
 - Annual recruitment audits.
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8. Prevent Duty

OUIitC fulfils its Prevent Duty by:

- Assessing risks of radicalisation and extremism.
 - Training staff to recognise signs of vulnerability.
 - Ensuring concerns are escalated via the DSL.
 - Maintaining Prevent risk assessments.
 - Working with statutory partners where required.
 - Applying filtering and monitoring to IT systems.
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9. Education & Empowerment

9.1 Staff & Volunteers

OUIitC provides:

- Safeguarding induction training.
- Annual refresher training.
- Specialist DSL training.

- CPD on emerging safeguarding risks.
 - Trauma-informed practice awareness.
 - Mental health first aid and wellbeing support.
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9.2 Participants & Families

OUIitC ensures:

- Clear safeguarding information is shared.
 - Reporting routes are visible and accessible.
 - Education on staying safe is delivered where appropriate.
 - Children and adults at risk know who to talk to.
 - Parents and carers are informed of safeguarding arrangements.
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10. Managing Incidents & Allegations

OUIitC:

- Has a clear reporting process for concerns.
 - Records concerns promptly and accurately.
 - Takes immediate protective action when required.
 - Refers to statutory agencies when thresholds are met.
 - Supports victims and those affected.
 - Applies disciplinary or contract procedures when appropriate.
 - Reports serious incidents to the Charity Commission and funders.
 - Uses trauma-informed approaches.
 - Reviews cases for organisational learning.
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11. Working in Partnership

OUIitC works in partnership with:

- Oxford United FC.
- Schools and colleges.
- Local authorities.
- Funders and governing bodies.
- Prisons and statutory partners.

All partners:

- Must meet safeguarding standards.
 - Have roles and responsibilities clearly defined.
 - Share information lawfully and appropriately.
 - Participate in joint safeguarding processes.
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12. Listening Culture

OUIc:

- Actively seeks feedback from beneficiaries.
 - Promotes speaking up.
 - Encourages challenge and transparency.
 - Responds respectfully to concerns.
 - Uses feedback to improve safeguarding practice.
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13. Programme Safeguarding Responsibilities

Safeguarding responsibilities are clearly defined for each programme based on delivery context and venue ownership. Written agreements are in place for all shared responsibility programmes, ensuring clarity over reporting routes, supervision and escalation.

14. Data Protection & Confidentiality

OUIc:

- Stores safeguarding data securely.
 - Limits access to authorised staff only.
 - Shares information on a need-to-know basis.
 - Retains records in line with GDPR.
 - Ensures confidentiality is balanced with protection.
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15. Review & Approval

This policy is:

- Reviewed annually.

- Updated following incidents.
- Revised following changes in guidance.
- Approved by the Board of Trustees.