Swindon Town FC
Community Foundation

Swindon Town FC **Community Foundation**
Football in the Community

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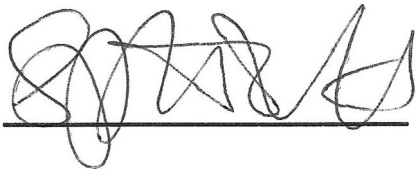
Swindon Town FC Community Foundation

Safeguarding Children and Vulnerable Adults in Sport, Physical Activity and Leisure

Latest review: January 2026

Date of next review: January 2027

This policy and set of procedures will be reviewed on an annual basis, or sooner should any major incident, organisational or legislative change arise.

Signed 

Shane Hewlett (Senior Safeguarding Manager)

Signed 

Kirsteen Fraser (Safeguarding Lead Trustee)

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1. Introduction

This Foundation acknowledges its responsibility to safeguard the welfare of every child, young person and vulnerable adult who has been entrusted to its care and is committed to working to provide a safe environment for all members. Every child, young person or vulnerable adult who plays or participates in sport with the Foundation should be able to take part in an enjoyable and safe environment and has the right to protection from and exploitation.

This Foundation recognises that safeguarding is the responsibility of every adult in our organisation.

2. Aims and Objectives

This policy sets out our commitment to safeguarding and includes procedures which all adults working and volunteering within the Foundation must follow if they have concerns about the safety and welfare of a child or vulnerable adult.

To ensure that safeguarding is paramount across the Foundation our aims are as follows:

- The child/vulnerable adult, whatever their age, culture, disability, gender, language, racial origin, religious belief and/or sexual identity has the right to protection from abuse.
- All suspicions and allegations of abuse and poor practice will be taken seriously and responded to swiftly and appropriately.
- All low-level concerns, regardless of how minor, that create a sense of unease about an individual's suitability to work with children or adults at risk even where they do not meet the threshold for formal safeguarding action must be reported to the DSO, DSL, or SSM using the Low-Level Concerns reporting document.
- All staff are recruited and checked in accordance with safer recruitment processes.
- All staff (paid/unpaid) working for Swindon Town FC Community Foundation have a responsibility to report concerns via 'MY Concern' or Low-level concerns google Doc.
- All staff are given the appropriate level of training to deal with situations that may occur and have the support required to report their concerns/suspicions.
- All staff, working with children/vulnerable adults are suitably accredited and all coaches/volunteers adequately qualified and checked through the Disclosure and Barring services. (DBS)

The safety and welfare of the child/vulnerable adult is paramount.

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3. Scope of the Policy

The scope of the policy covers any activity led by staff working/volunteering for the Foundation taking place in council-owned leisure centres, as well as any sessions and programmes managed or delivered by the Foundation in wider community settings.

This policy and set of procedures applies to:

- Staff (paid/unpaid) working for, in partnership with or on behalf of Swindon Town FC Community Foundation. This includes contracted members of staff, casual staff, temporary staff and volunteers. For the purposes of this document, the term 'staff' refers to any of the above.
- Senior managers and trustees

4. Working in Partnership

This Foundation is committed to working in partnership with to ensure there is a collaborative approach to promoting and protecting the safety, welfare and wellbeing of children, young people and adults at risk:-

- Swindon Safeguarding Partnership (previously Swindon Local Safeguarding Children Board)
- Children's Social Care (for children up to their 18th birthday)
- Adults' Social Care (for vulnerable adults aged 18 and above)
- The Police
- The Disclosure and Barring Service
- Swindon Town Football Club
- EFL
- Premier League
- The Football Association

5. The Role of the Safeguarding Team at the Foundation

Our Senior Safeguarding Manager (SSM) is Shane Hewlett
Our Designated Safeguarding Officer (DSO) is Brad Carter
Our Safeguarding Lead Trustee (SLT) is Kirsteen Fraser
Our deputy DSO for STFC is Jim Neighbour
Mental Health 1st Aider (MHFA) – Andrea Clayton

- The role of the DSO is to oversee safeguarding arrangements at the Foundation and ensure that

procedures are robust. They are also the person who should be contacted in the event of a disclosure of abuse, which involves an adult working in a position of trust / within the Foundation *(See 'Alleged Abuse by Staff, Managers, Volunteers or Trustees', section 8)*. The Designated safeguarding lead will report any allegations about adults working in the Foundation (including volunteers) to the FA Safeguarding Team *(See appendix 7 of Working Together To Safeguard Football – referral form).*

- The role of the DSO is to respond to concerns about the safety /welfare of children /vulnerable adults who are engaging with the Foundation and participating in football /sport *(See Section 6, 'Responding to reports about the safety/welfare of children/vulnerable adults – next steps for the DSL/deputy DSL'.*
- The role of the deputy DSO is to act in the DSO absence and respond to reports of concern about the safety/welfare of a child/vulnerable adult.
- The role of the Mental Health First Aiders (MHFAs) play an important role in supporting our organisation's safeguarding approach by providing an accessible, non-judgemental point of contact for staff, participants, and volunteers who may be experiencing emotional distress or emerging mental health concerns. Their role is to recognise early signs of difficulty, offer a safe and confidential space to talk, and guide individuals toward appropriate internal or external support. MHFAs do not diagnose, provide counselling, or replace professional services; instead, they contribute to a culture of openness, wellbeing, and early intervention. Where a concern indicates potential risk of harm to the individual or others, MHFAs must follow the organisation's safeguarding procedures, share information appropriately, and escalate concerns to the Designated Safeguarding Lead in line with statutory guidance and organisational policy.

All three staff work in partnership with the Club. The SSM and the DSOs from Swindon Town FC Community Foundation meet quarterly with the Swindon Town FC Club DSL Alisha Henry to discuss safeguarding. If any issues or instances occur in between these quarterly meetings then we will arrange to meet as a matter of urgency to meet and deal with the situation.

The Senior Safeguarding Manager (SSM), Safeguarding Lead Trustee (SLT) and Designated Safeguarding Officers (DSOs) meet on a quarterly basis with the CCO and the safeguarding points of contact for the Ladies' team and the STFC Academy to provide a formal forum for strategic and operational safeguarding oversight.

These meetings are used to:

- review and discuss safeguarding policies and procedures, ensuring consistency of practice and alignment

across all delivery areas;

- share learning, emerging risks, accident prevention, trends and themes arising from safeguarding concerns, incidents and complaints;
- review updates to legislation, statutory guidance and recognised good practice and agree any required changes to procedures or training;
- monitor compliance with safeguarding requirements, internal audits and agreed action plans;
- strengthen communication and partnership working between STFCCF, the Ladies' programme and the STFC Academy;
- and consider any other safeguarding matters ("any other business") to ensure a coordinated, timely and proactive approach to safeguarding across all affiliated provision.

Formal minutes are taken, actions are agreed and progress is monitored to support accountability and continuous improvement in safeguarding practice.

STFCCF demonstrates a clear and active commitment to youth voice and meaningful participation by consulting with Beneficiaries (including children, young people and adults at risk) and their parents and/or carers when:

- establishing and supporting youth voice groups / youth forums to enable young people to share their views, experiences and ideas about STFCCF activities and services;
- involving young people directly in the design, development and review of programmes and activities, including through workshops, focus groups and co-production sessions;
- seeking feedback from children and young people through age-appropriate surveys, group discussions and informal feedback activities at sessions and events;
- consulting young people on what helps them feel safe, respected and included within STFCCF activities and environments;
- inviting young people to contribute to the review of safeguarding practices, behaviour standards and participation expectations in ways that are accessible and suitable to their age and understanding;
- ensuring that young people from a range of backgrounds and needs, including those who may be less confident to speak out, are actively encouraged and supported to have their voices heard;
- using youth feedback and consultation outcomes to inform decisions, shape service delivery and improve programmes, and clearly communicating back to young people how their views have influenced change ("you said – we did").

STFCCF ensures that youth voice is embedded within its culture and practice, and that children and young people are treated as active partners in the development, delivery and improvement of its services.

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Designated Safeguarding Lead (DSL) – Key Responsibilities

The Designated Safeguarding Lead (DSL) will have responsibility for the effective implementation and oversight of safeguarding arrangements across STFCCF and will:

- Provide strategic and operational oversight of the safeguarding policy and procedures for STFCCF, ensuring compliance with relevant legislation, statutory guidance and good practice, and making recommendations to the Board for updates and improvements where required.
- Personally undertake continued professional development (CPD) in safeguarding legislation and best practice at least once per year and ensure their own knowledge remains current and appropriate to the role.
- Coordinate the delivery of STFCCF's safeguarding training programme, ensuring that all trustees, staff and volunteers receive appropriate safeguarding training in line with their roles and responsibilities.
- Implement and monitor safeguarding arrangements within STFCCF and across the delivery of all services, projects and activities.
- Act as the first point of contact for any report, disclosure or suspicion of abuse, or any concern relating to the welfare or safety of a child or adult at risk who is a beneficiary of, or otherwise connected with, STFCCF.
- Manage safeguarding concerns, complaints and allegations, ensuring that they are handled promptly, sensitively and in accordance with STFCCF's safeguarding procedures and relevant statutory guidance.
- Provide advice and support to colleagues in relation to safeguarding matters, concerns and best practice within STFCCF.
- Report on safeguarding matters to the Board of Trustees, including themes, trends, training activity, and any significant incidents or risks affecting STFCCF (while maintaining appropriate confidentiality).
- Work collaboratively with the affiliated football club's Designated Safeguarding Lead (DSL) to ensure effective information sharing, consistency of approach and joined-up safeguarding arrangements where activities or participants overlap with STFCCF.
- Manage and oversee all safeguarding reporting, referrals and information sharing on behalf of STFCCF with external agencies and partner organisations, including local authorities, statutory services and relevant sporting or regulatory bodies, in line with data protection and information-sharing requirements.

Contact Details

Kirsteen Fraser – Swindon Town FC Community Foundation Lead Safeguarding Trustee – SLT	**07780660410**
Shane Hewlett – Head of Foundation – SSM for STFCCF	**07919112982**
Jim Neighbour STFC DSL	07850383042

Brad Carter - DSO for STFCCF	**01793 421303**
Jon Holloway – Director of Foundation	**07966305320**
Alex Richards - DSO EFL Trust	**01772 325940**
Tara Lawson – EFL Safeguarding & Incident Manager	**07964905652**
Andrea Clayton – Mental Health 1st Aider	**07488 599199**
Swindon Town FC Women	**01793 466849**
To raise a concern or to make a referral about Vulnerable Adults	**(Swindon) 01793 463555** **Emergency Duty Service: Weekends & Night 01793436699** **(Wiltshire) 0300 456 0111** **Emergency Duty Service 0845 607 0888**
To raise a concern or make a referral about a child or young person (under the age of 18) **Multi Agency Safeguarding Hub (MASH)**	**(Swindon) 01793 466903** **Emergency Duty Service 01793436699** **(Wiltshire) 0300 4560 108** **Emergency Duty Service 0845 6070888**
Police	**101 999 Emergency Services**
The FA Safeguarding Team	**0800 169 1863**
NSPCC helpline	**0808 800 5000**
NSPCC Whistle-Blowing helpline	**0800 028 0285**
Referral Forms for Referral to Children's Social Care	**https://safeguardingpartnership.swindon.gov.uk**
Referral Forms for Referral to Adult Social Care	**https://www.swindon.gov.uk/info/20011/adult_social_care_and_support/1120/report_a_safeguarding_concern_about_an_adult_at_risk_of_or_experiencing_harm/3**

6. Procedures for Responding to Concerns/Disclosures Involving the Welfare or Safety of a Child, Young Person, or Vulnerable Adult

Safeguarding is everyone's responsibility. If you are worried about a child, young person or vulnerable adult it is important that you report your concerns – no action is not an option.

<u>For information about signs and indicators of abuse and the categories of abuse please refer to:</u>

a. **Appendix 2 of this document for information about categories of abuse and signs and indicators.**
b. **Working Together to Safeguard Children 2026 (Department for Education)**
c. **'What to do if you're worried a child is being abused' DfE (March 2015)**
d. **Keeping Children Safe in Education (DfE, September 2025)**

What to do if you receive a disclosure of abuse or poor practice from a child or vulnerable adult:

1. Stay calm.
2. Ensure the person is safe and there is no immediate danger.
3. If the person is present, reassure them they were right to tell and they are not to blame.
4. Take what they say seriously.
5. If the child or vulnerable adult needs immediate medical treatment, telephone for an ambulance, inform doctors/medic of your concerns and ensure that they are aware that this is a protection issue.
6. Don't promise to keep confidentiality or promise a possible outcome – explain that you will need to talk to an appropriate colleague about the issue.
7. Keep questions to a minimum and only use them to clarify what you have been told.
8. In the event of suspicion of sexual abuse, advise the child or vulnerable not to bathe or shower until given permission to do so. Washing can destroy valuable evidence.

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As soon as possible (within one hour) report the matter to:

Shane Hewlett Senior Safeguarding Manager:

07919112982 shane@stfcfoundation.com

If unavailable, contact Jon Holloway 07966305320 or SLT Kirsteen Fraser

07780660410 **kirsteen@stfcfoundation.com**

If neither can be contacted, then 24-hour support is available from:

The Emergency Duty Service, Weekends & Night - 01793 436699

Other Contacts include:

Local emergency details for children services - 0845 607 0888
FA Helpline - 0800 169 1863

NSPCC Helpline - 0808 800 5000

1. Andy Tye/Brad Carter Designated Safeguarding Officers will **REFER** the matter as soon as possible (but within one working day) to the relevant statutory agencies (Police, Social Care, LADO) depending on the concern.

2. Make a full written **RECORD** of what was said, seen and heard as soon as you can using the concern/disclosure/incident for *(see appendix 1)* and provide to Andy Tye/Brad Carter, Designated Safeguarding Officers, as soon as practicable - ideally within the hour where possible (must be within 24 hours). Andy Tye/Brad Carter, Designated Safeguarding Officers, will follow up using the below procedures.

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7. Handling of Disclosure - Flow Chart

RESPOND: Stay Calm – ensure the immediate safety of the person about whom you have the concerns. If medical attention is required – ring for an ambulance or take them to hospital. Explain to the medic that you have a protection concern.

RECOGNISE: Do you have an immediate safeguarding or protection concern?

NO IMMEDIATE DANGER

YES

Immediate danger

Contact POLICE Tel 999 or Emergency Social Care Duty Team 0845 607 0888

Action 2: REFER: Within one hour report to Shane Hewlett – SSM

- 07919112982

Complete Safeguarding Disclosure Form *(see appendix 1)* and provide to Shane Hewlett SSM and Kirsteen Fraser Safeguarding Lead Trustee

RESOLUTION: The concerns will then be taken forward by the DSO and those agencies involved.

Advice available during any stage of the process:

Shane Hewlett

SSM

Advice can also be sought from: **The FA / NSPCC**

Helpline

0808 800 5000

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8. Alleged Abuse by Staff, Managers, Volunteers or Trustees

- If a concern/disclosure involves reference to alleged abuse or inappropriate behaviour by an adult working within the Foundation, the SLT should be contacted as soon as possible. This is Kirsteen Fraser. **07780660410** in her absence Shane Hewlett SSM **07919112982**
- A record should be made by the member of staff in receipt of the concern / disclosure. This should be passed to the SSM. Copies should not be retained by you.
- If the concern / disclosure involves the SSM, this must be reported directly to the LADO. This needs to be done as soon as possible (within 24hrs).
- The member of staff who is in receipt of a concern or disclosure must not discuss this with the adult involved.
- The DSO will contact the Local Authority Designated Officer in the first instance on 01793 466848
- If a member of staff / Volunteer or Trustee is suspended or dismissed from their role then the EFL (Clare Taylor) and The FA safeguarding team should be informed by telephone within 72 Hours. The Foundation has a legal duty to make a referral to the DBS after a first investigation/suspension or is dismissed from working with the organisation.
- The DSO will report any allegations about staff working in the Foundation to the FA Safeguarding Team **within 24 hours of the allegation being reported** *(see appendix 7 of Working Together to Safeguard Football – referral form).*
- Records of allegations involving staff are stored confidentially and securely.

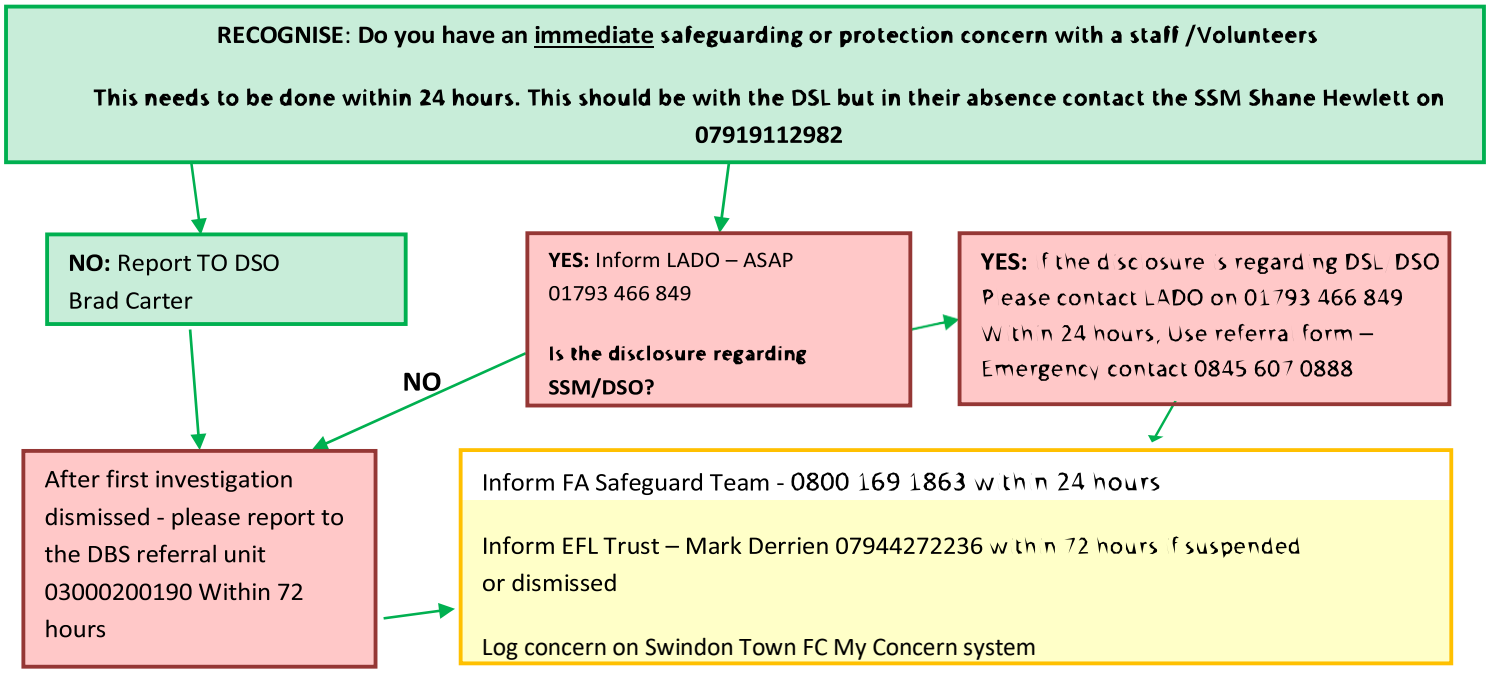
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Alleged Abuse by Staff Members Flow Chart



STFCCF is committed to ensuring that all serious safeguarding incidents are identified, addressed, and reported promptly, transparently, and responsibly. All staff, volunteers, trustees, and representatives have a duty to remain vigilant and to act immediately where concerns arise. This includes, but is not limited to, allegations or evidence of abuse (physical, emotional, or sexual), neglect, exploitation, misconduct or inappropriate behaviour by staff or volunteers, breaches of safeguarding procedures, and instances of poor practice. It also includes any incident that may result in criminal investigation or cause reputational damage to STFCCF or its grant makers.

Arrangements for managing incidents involving individuals where a potential conflict of interest exists refer to the steps taken to ensure that safeguarding concerns are handled impartially, transparently, and without undue influence. A conflict of interest may arise where the individual involved in the concern is in a position of authority, has a close personal or professional relationship with the person receiving the report, or could otherwise influence decision-making.

In such circumstances, the individual with the conflict must not be involved in any aspect of the reporting, assessment, or investigation process. The concern must instead be escalated to an alternative, independent senior person, such as a Deputy Safeguarding Lead, another senior manager, or the Chair of Trustees. This ensures that decisions are made objectively and that the integrity of the safeguarding process is maintained.

These arrangements are essential to protect all parties involved, maintain trust in the organisation's safeguarding practices, and ensure that concerns are taken seriously and acted upon appropriately, regardless of the seniority or role of those involved.

The safety and wellbeing of individuals at risk is always the primary concern. Where there is immediate danger, emergency services must be contacted without delay. All concerns must be recorded factually and reported within 24 hours to the SSM, or to an appropriate senior authority if the concern involves the SSM. The SSM is responsible for assessing the incident and ensuring that appropriate action is taken, including referral to statutory authorities such as safeguarding teams, the police, or regulatory bodies where required.

STFCCF is committed to openness and accountability and will report serious incidents to relevant regulators and inform grant makers where incidents may affect funded activities or pose reputational risks. Information will be handled sensitively and shared on a need-to-know basis, in line with data protection requirements. Following any incident, appropriate measures will be taken to manage risk, support those affected, and review practice to ensure continuous improvement and the highest standards of safeguarding are maintained.

9. Record keeping

See also Swindon Town FC Community Foundation Data Protection Policy – Privacy Policy

Original records of concerns /disclosures made by a member of staff are handed directly to the DSO or deputy DSO.

These are recorded securely and confidentially by the Foundation on the Swindon Town FC My Concern system and there is restricted access to these records.

Where appropriate, access may be given to the Designated Safeguarding Lead at the school or college where the Foundation is working if applicable.

Records of concerns/disclosures will be retained whilst the child or vulnerable adult remains on the registers with Swindon Town FC Community Foundation for the purposes of participation in football/sport. These records will be destroyed once the child/vulnerable adult is no longer on roll.

Where a concern or disclosure has resulted in a referral to social care by the Foundation this will have been sent to the appropriate MASH team, who will store a copy on their system.

Personal information held relating to contact details are stored securely. It is the parents/carers responsibility to inform the Foundation if contact details are updated.

10. Information Sharing

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Sharing information is an intrinsic aspect of working with children and young people. The decisions about how much information to share, with whom and when, can have a profound impact on individuals' lives.

It could ensure that an individual receives the right services at the right time and prevent a need from becoming more acute and difficult to meet. At the other end of the spectrum it could be the difference between life and death. Poor or non-existent information sharing is a factor repeatedly flagged up as an issue in Serious Case Reviews carried out following the death of, or serious injury to, a child.

Fears about sharing information cannot be allowed to stand in the way of the need to safeguard and promote the welfare of children at risk of abuse or neglect.

Staff should understand the circumstances in which they may lawfully share information, and that it is in the public interest to prioritize the safety and welfare of children.

They must be alert to signs of abuse and neglect and taking action.

Abuse (emotional, physical and sexual) and neglect can present in many different forms. Indicators of abuse and neglect may be difficult to spot. Children may disclose abuse, in which case the decision to share information is clear. In other cases, for example, neglect, the indicators may be more subtle and appear over time. In these cases, decisions about what information to share, and when, will be more difficult to judge *(See appendix 2 – definitions of abuse).*

If there are concerns about a child's welfare, or if it is believed that a child is at risk of harm, the information should be shared with the Foundation's Designated Safeguarding Officer, who in turn will consider whether to inform the local authority MASH team, NSPCC and/or the police, in line with local procedures. Parents and carers will be informed about the concerns unless to do so would increase the risk to the child or young person. In this instance advice will be sought from the local authority MASH team.

Security of information sharing must always be considered and should be proportionate to the sensitivity of the information and the circumstances. If it is thought that a crime has been committed and/or a child is at immediate risk, the police should be notified without delay.

Vulnerable adults have a general right to independence, choice and self-determination including control over information about themselves. In the context of adult safeguarding these rights can be overridden in certain circumstances:-

Emergency or life-threatening situations may warrant the sharing of relevant information with the relevant emergency services without consent.

The law does not prevent the sharing of sensitive, personal information within organisations. If the information is confidential, but there is a safeguarding concern, sharing it may be justified.

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The law does not prevent the sharing of sensitive, personal information between organisations, where the public interest served outweighs the public interest served by protecting confidentiality – for example, where a serious crime may be prevented.

It is good practice to try to gain the person's consent to share information. As long as it does not increase risk, practitioners should inform the person if they need to share their information without consent.

Foundation staff are reminded of the Swindon Town FC Community Foundation Whistle-Blowing Policy if an individual does not believe that information is not being responded to.

What do we mean by sharing nudes and semi-nudes?

In the latest advice for education settings (UKCIS, 2024), this is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. Nudes and semi-nudes can be shared online via social media, gaming platforms, chat apps, forums, or involve sharing between devices using offline services. Alternative terms used by children and young people may include 'dick pics' or 'pics'. The motivations for taking and sharing nude and semi-nudes are not always sexually or criminally motivated.

This advice does not apply to adults sharing nudes or semi-nudes of under 18-year olds. This is a form of child sexual abuse and must be referred to the police as a matter of urgency.

What to do if an incident comes to your attention

Report it to your Designated Safeguarding Lead (DSL) or equivalent immediately. Your setting's child protection policy should outline codes of practice to be followed.

Never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – **this is illegal** (see note below).

Note: In exceptional circumstances, it may be necessary for the DSL (or equivalent) only to view the image to safeguard the child or young person. That decision should be based on the professional judgement of the DSL (or equivalent).

If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.

Do not delete the imagery or ask the young person to delete it.

Do not ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).

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Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.

Do not say or do anything to blame or shame any young people involved.

Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

11. Whistle-Blowing

See also Swindon Town FC Community Foundation Whistle-Blowing policy.

This Foundation supports the FA's Whistle-Blowing Policy and has a separate Whistle-Blowing Policy which outlines a graduated response to report concerns about the practice or behaviour of an adult working within the Foundation. Ultimately, any adult or young person with concerns about an adult in a position of trust in the organisation can Whistle-Blow by emailing safeguarding@thefa.com or contacting the NSPCC Whistle- Blowing helpline 0800 028 0285.

(See Section 7, Swindon Town FC Community Foundation safeguarding disclosure flowchart.)

11.1 Allegation against DSO or DSL

(List of internal and external contacts shown in Whistle-Blowing Policy)

The Investigation Process will be undertaken by the DSO, who may be supported by an appropriate member of Swindon Town FC Community Foundation Senior Management Team. However, should your allegation concern the DSL, DSO or Head of Foundation or have not received a satisfactory response or conclusion to your concern you can approach the following people *(See section 7, Whistle-Blowing Policy)*

11.2 Complaints and Appeals

(See the Swindon Town FC Community Foundation Complaints Policy)

12. Swindon Town FC Community Foundation Staff Code of Conduct for all Staff and Volunteers

1. Staff have a responsibility to ensure that the below qualifications are in date and valid (Coaches will not be permitted to work if any of these are not valid):

- First Aid
- DBS
- Coaching License
- Completion of Safeguarding Workshop

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2. All staff must be punctual for work and sessions (15 minutes arrive before sessions start)

3. Preparation and completion of Coaching sessions. We require coaches to:

- Complete register for session and sign and return to administration on a fortnightly basis
- Ensure any photos taken have parental consent (details on register)
- Inform School, Administration if participants have arrived and are not on your register (participants are not permitted to attend if they are not on your register)
- Ensure that you follow the school protocol of de-registering children at individual sessions
- Never leave a child unattended (Please contact school or staff numbers below)
- Complete session risk assessment and return at end of course.
- Ensure that you have adequate first aid provision and forms.
- Count in and account for all equipment used before during and after the session.
- Ensure that, in line with FA Guidelines, all players are required to wear shin pads for sessions.

4. Mobile phones should not be used in sessions except for an emergency.

5. Sickness If you are unable to attend work/ Session then please ensure that you inform the Foundation as soon as possible making contact with the one of the following people (it is not acceptable to text or email a full-time member of staff):

- Shane Hewlett - 07919112982 – Senior Safeguarding Manager and Head of Foundation
- Swindon Town FC Community Foundation 017903 421303 – Swindon Town Foundation, Full-time Staff
- Jon Holloway 07966305320 – Swindon Town FC Community Foundation, Director of Foundation
- Kirsteen Fraser 07780660410 – Safeguarding Lead Trustee

6. Uniformed Coaches are required to wear the appropriate uniform at all times (not for private sessions not associated with Swindon Town FC Community Foundation).

7. Any derogatory remarks regarding Swindon Town FC Community Foundation or Swindon Town Football Club or any members of staff/colleagues associated with either organisation posted on Social media will result in disciplinary action

8. In the event of an allegation against staff members the consequences for any proven breaches or poor conduct will lead disciplinary procedures and potential dismissal.

9. Under our safeguarding policy staff are reminded that they do not engage with Participants / Volunteers under the age of 18, this includes

- Text Group chats

- Messaging Apps (Whatsapp, Line, etc.)
- Social media (Facebook, Twitter, Instagram, Snapchat, etc.)

12.1 Parents and Players Code of Conduct

Players and Parents must receive clear guidance on their responsibility to adhere to the code of conduct. This should be shared with them on their introduction to the Swindon Town FC Community Foundation activities and on an annual basis or if an incident occurs.

- Show respect to others involved in the game including match officials, opposition players, coaches, managers, officials and spectators.
- Adhere to the laws and spirit of the game.
- Promote Fair Play and high standards of behaviour.
- Always respect the match official's decision.
- Never enter the field of play without the referee's permission.
- Never engage in public criticism of the match officials.
- Never engage in, or tolerate, offensive, insulting or abusive language or behaviour.

When working with players, I will:

- Place the well-being, safety and enjoyment of each player above everything, including winning.
- Explain exactly what I expect of players and what they can expect from me.
- Ensure all parents/carers of all players under the age of 18 understand these expectations.
- Never engage in or tolerate any form of bullying.
- Develop mutual trust and respect with every player to build their self-esteem.
- Encourage each player to accept responsibility for their own behaviour and performance.
- Ensure all activities I organise are appropriate for the player's ability level, age and maturity.
- Report any potential safeguarding concerns *(See Section 6 and 7, Procedures for responding to concerns/disclosures involving the welfare or safety of a child, young person and Flow Chart).*
- Do not engage in 'Banter' of any nature, with any players/participants who are volunteering/ working within our Swindon Town FC Community Foundation programme under the age of 19.

12.2 Grievance Procedure

Swindon Town FC Community Foundation are committed to the wellbeing of its staff. In the unfortunate event of an issue we have procedures in place for staff to follow *(See Swindon Town FC Community Foundation Complaints policy)*

12.3 Issues with Another Member of Staff

If you have issue with a member of Swindon Town FC Community Foundation staff, then please contact Brad Carter or Andy Tye (Assistant Heads of Foundation & DSO) or Shane Hewlett (Head of Foundation).

12.4 Issue with Management Staff

If your issue is with management staff at Swindon Town FC Community Foundation then please contact Kirsteen Fraser (Chairman of the Foundation).

12.5 Accountability

I understand that if I do not follow the code, any/all of the actions below may be taken by Swindon Town FC Community Foundation, County FA or The FA:

- Required to meet with the Foundation Manager or County Welfare Officer.
- Monitored by the Assistant Head of Foundation.
- Required to attend a FA education course.
- Suspended by the Swindon Town FC Community Foundation from attending sessions.
- Required to leave or be dismissed by Swindon Town FC Community Foundation, in addition my FA Licensed Coaches Club membership may be withdrawn

13. Transporting Children, Young People, and Vulnerable Adults

Staff need to ensure they are fully insured, and their vehicles are roadworthy to carry out the work of Swindon Town FC Community Foundation. Staff should park in allocated bays at all satellite centres and adhere to the speed limits and safety rules of respective sites. Staff should not be in a 1 to 1 situation with the transporting of young people and vulnerable adults.

13.1 Swindon Town FC Community Foundation Transport Code of Conduct

All students should be made aware by the adult accompanying the group that whilst travelling on all forms of Swindon Town FC Community Foundation transport:

- The driver is never to be disturbed whilst driving.
- Passengers must remain seated and avoid unnecessary movement around the bus.
- If fitted, all passengers must wear a seat belt.
- Whilst travelling, if any participant does not comply with these regulations their parents will be contacted and alternative arrangements will need to be sought.
- All passengers are responsible for their own safety and the safety and storage of their own equipment and luggage.
- Passengers must not drop litter.

- It is the right of the driver to refuse travel to any passenger under the following circumstances:

  i. Verbal or physical abuse towards the driver or another passenger
  ii. Any behaviour deemed to make driving conditions unsafe
  iii. The bus is at its legally safe capacity for passengers

14. Visits and Trips

See also Swindon Town FC Community Foundation 'Trips, Residentials and Tours' policy.

Those leading a trip must follow the procedures set out by the Swindon Town FC Community Foundation and contained in the Current Department for Education guidance on educational visits and risk assessment and the Swindon LEA policy on Educational Trips.

Care must be taken to:

- Ensure that any trip in Swindon Town FC Community Foundation time is justified on educational grounds.
- Ensure that a balance is maintained between time spent on trips and not missing vital curriculum.
- Avoid undue pressure being applied to participants to participate.
- Avoid disruption to the School timetable by making sure that as far as possible residential trips take place during school holidays to avoid a loss of educational time.
- Avoid where possible Swindon Town FC Community Foundation trips for any year groups in their examination periods.
- Avoid trips where time spent travelling is disproportionate to the potential benefits gained.
- Avoid trips where the cost of participating is socially divisive.

14.1 Risk Assessments

STFCCF is committed to ensuring that robust safeguarding measures are embedded within all activities through effective risk assessment and quality assurance processes. A risk assessment must be completed prior to all trips, services, projects, and activities involving children, young people, and adults at risk. These assessments must identify potential safeguarding risks and outline appropriate control measures to mitigate them. Completed risk assessments must be submitted to the Swindon Town FC Community Foundation Manager and are securely stored electronically or made available by the Foundation Manager upon request. Appropriate quality assurance measures will be implemented both prior to and during delivery to ensure that safeguarding standards are maintained and risks are effectively managed. Where activities involve third-party organisations, STFCCF will ensure that there is a shared commitment to safeguarding, supported by formal contractual agreements which clearly set out agreed safeguarding responsibilities and expectations

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Lost Children or Vulnerable Adults

In the situation where a child or vulnerable adult is unable to be accounted for, the staff member in charge will:

- Contact the parent/carer/responsible adult to establish if they are aware of the child's whereabouts.
- Contact the police if the child or vulnerable adult's whereabouts cannot be established.
- Alert the DSO as soon as possible.

15. Children not Collected

Where children and young people sign up to attend activities with the Foundation, contact details are requested from the parent / carer. This includes an emergency contact. If a child is not collected at the end of a session, the Foundation will use the contact details provided by the parent/carer to endeavor to make contact. If no contact can be made, an adult from the organisation will supervise the child. The DSO will be alerted, who in turn will contact the MASH team *(See section 5 for contact details).*

16. Anti-Bullying

Also see Swindon Town FC Community Foundation Anti Bullying Policy

This Foundation is committed to providing a caring, friendly and safe environment for all of our members so they can participate in football in a relaxed and secure atmosphere. Bullying of any kind is unacceptable at our Club and Community Foundation. If bullying does occur, all club members or parents should be able to tell and know that incidents will be dealt with promptly and effectively. We are a *TELLING* Club. This means that anyone who knows that bullying is happening is expected to tell the Swindon Town FC Community Foundation Safeguarding lead or Lead Safeguarding Trustee Lead.

16.1 What is Bullying?

- Bullying is the use of aggression with the intention of hurting another person.
- Bullying results in pain and distress to the victim.
- Bullying can be Emotional being unfriendly, excluding (emotionally and physically), sending hurtful text messages, tormenting (e.g. hiding football boots/shin guards, threatening gestures).
- Physical pushing, kicking, hitting, punching or any use of violence.
- Racist racial taunts, graffiti, or gestures.
- Sexual unwanted physical contact or sexually abusive comments.
- Homophobic because of or focussing on the issue of sexuality.
- Verbal name-calling, sarcasm, spreading rumours, teasing.

- When one child bullies another this can be referred to as Child on child abuse.
- It can take place in the real word or online.

16.2 Why is it Important to Respond to Bullying?

Bullying hurts. No one deserves to be a victim of bullying. Everybody has the right to be treated with respect. Individuals who are bullying need to learn different ways of behaving. The Club and Community Foundation have a responsibility to respond promptly and effectively to issues of bullying.

- All club members, coaches, officials and parents/carers should have an understanding of what bullying is.
- All club members, officials and coaching staff should know what the club policy is on bullying and follow it when bullying is reported.
- All players and parents/carers should know what the club policy is on bullying, and what they should do if bullying arises.
- As a club we take bullying seriously. Players and parents/carers should be assured that they would be supported when bullying is reported.
- Bullying will not be tolerated.
- All club members, coaches, officials and parents/carers should have an appreciation of the signs and indicators of bullying.

16.3 The Football Association Anti-Bullying Policy for Football Clubs Recommended Guidelines

A child may indicate by signs or behaviour that he or she is being bullied. Adults should be aware of these possible signs and they should investigate if a child:

- Says he or she is being bullied
- Is unwilling to go to club sessions
- Becomes withdrawn, anxious, or lacking in confident
- Feels ill before training sessions
- Comes home with clothes torn or training equipment damaged
- Has possessions go missing
- Asks for money or starts stealing money (to pay the bully)
- Has unexplained cuts or bruises
- Is frightened to say what's wrong
- Gives improbable excuses for any of the above.

Or in more extreme cases, if a child:

- Starts stammering
- Cries themselves to sleep at night or has nightmares

- Becomes aggressive, disruptive or unreasonable
- Is bullying other children or siblings
- Stops eating
- Attempts or threatens suicide or runs away.

These signs and behaviors may indicate other problems, but bullying should be considered a possibility and should be investigated.

16.4 Procedures for Responding to Incidents of Bullying

- Incidents of bullying should be reported to the Senior Safeguarding Manager, Shane Hewlett or DSL Andy Tye/Brad Carter or contact the County Football Association Child Protection Officer (CFA CPO) and logged on the Swindon Town FC My Concern system.
- With parents remind of players' code of conduct.
- Parents/carers should be informed and will be asked to come in for a meeting to discuss the situation and mediate with those concerned.
- If necessary and appropriate, Police will be consulted.
- The bullying behaviour or threats of bullying must be investigated and the bullying stopped quickly.
- An attempt will be made to help the bully (bullies) change their behaviour.
- If mediation fails and the bullying is seen to continue the club will initiate disciplinary action under the club constitution.

17. Safer Recruitment

See Swindon Town FC Community Foundation Safe Recruitment Policy

The Foundation endorses and adopts the FA's Responsible Recruitment guidelines for recruiting staff, including volunteers and works in accordance with the procedures laid out in part 2 of Working Together to Safeguard Children 2026 (updated March 2026)

Sound recruitment and selection procedures will support the Foundation to screen out those who are not suitable to work for the organisation.

Step 1 - Planning and advertising

- The key responsibilities for the role are agreed, together with the skills and experience which the perspective employee / volunteer will need to have to fulfil the role.
- All job/role descriptions include reference to individual safeguarding responsibilities.
- All adverts for roles within the Foundation include a safeguarding statement.

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Step 2 – Application Process

- Perspective candidates are required to complete an application form.
- Completed applications are scrutinised by a panel. A check is made to ensure that the application form has been completed in full (including sections on criminal records and self-disclosures), ensuring any gaps in employment are accounted for.
- At least one member of the panel has completed additional training about safer recruitment.

Step 3 – References

- Two references are sought from short-listed candidates.
- These should not be from relatives of the candidate.
- One reference is requested from the candidate's place of work, if applicable and if possible, one that demonstrates their involvement with sport involving children and young people.

Step 4 – Interviewing

- Interviews take place face to face.
- At least one safeguarding question is asked.
- Short-listed candidates who attend an interview are required to provide proof of identification.

Step 5 – Checks completed once an appointment has been made

- The successful candidate will be offered the job/role **subject to DBS checks being satisfactory**. This is made clear in the letter sent to the successful candidate.
- An enhanced DBS check is competed for all new staff / volunteers. Should a DBS check reveal information about previous convictions, this information will be considered by the Foundation and decisions will be made in accordance with legislation and in the best interests of children and young people. Unless they've been barred from working with children or vulnerable adults, ex-offenders shouldn't necessarily be excluded from working within the Foundation.
- The following questions will be considered:

  What's the nature of the role?

  Is the offence relevant to the role?

  What's the nature of the offence, and how serious is it?

  How old was the applicant at the time they offended? How long has it been since the offence occurred?

  Was the offence revealed at the application stage?

- For adults who will be working in regulated activity (unsupervised) a check against the barred list for both children and vulnerable adults will also be completed. It is an offence to for someone who has been barred from working with children/vulnerable adults to work in regulated activity with children/vulnerable adults.

The Foundation aims to prevent people with a history of relevant and significant offending from having contact with children, young people and vulnerable adults.

Information about recruitment, including disclosure numbers and identity checks is held centrally by the Foundation on a central record.

Step 6 – Induction of new staff /volunteers

Following the appointment of a new member of staff or a volunteer, safeguarding and child protection induction is provided. This includes provision of:

- Safeguarding and child protection training, which includes the procedures to follow if concerned about a child, young person or vulnerable adult.
- The Foundation's Safeguarding and child protection policy and procedures and related documents.
- Information about key safeguarding personnel within the Foundation and contact details. Staff and volunteers are asked to sign to acknowledge that this induction has been completed

18. Training

This Foundation is committed to ensuring staff and volunteers know and understand:

- the signs and symptoms of abuse.
- their responsibility for referring concerns to the Designated Safeguarding Officer / Deputy DSO.
- the procedures for reporting safeguarding /child protection concerns about adults working with children, young people or vulnerable adults (allegations).

Safeguarding and child protection training is provided on a regular basis to all staff, at least annually, to enable them to carry out these requirements.

The statutory requirement for DSO and deputy DSO is to renew training every 2 years. We work in

line with this requirement.

Our deputy DSO has completed advanced training to the same level as the DSL, in line with the requirements of the Swindon Safeguarding Partnership.

All staff, volunteers, regular visitors and external staff are required to read the Foundation's Safeguarding and Child Protection policy and sign to confirm they have completed this.

18.1 Recruitment of Ex-Offenders *(See Recruitment Policy)*

Swindon Town FC Community Foundation is committed to the fair treatment of its staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependents, age, physical/mental disability or offending background.

A DBS check is only requested after a thorough risk assessment has indicated that one is both proportionate and relevant to the position concerned. For those positions where a DBS check is required, all application forms, job adverts and recruitment briefs will contain a statement that a DBS check will be requested in the event of the individual being offered the position.

Where a DBS check is to form part of the recruitment process, we encourage all applicants called for interview to provide details of their criminal record at an early stage in the application process.

We request that this information is sent under separate, confidential cover, to a designated person within Swindon Town FC Community Foundation and we guarantee that this information will only be seen by those who need to see it as part of the recruitment process. Unless the nature of the position allows Swindon Town FC Community Foundation to ask questions about your entire criminal record, we only ask about 'unspent' convictions as defined in the Rehabilitation of Offenders Act 1974.

We ensure that all those in Swindon Town FC Community Foundation who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences. We also ensure that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974.

At interview, or in a separate discussion, we ensure that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment. We make every subject of a DBS check aware of the existence of the Code of Practice and make a copy available on request. We agree to discuss any matter revealed in a DBS check with the

person seeking the position before withdrawing a conditional offer of employment

19. Quality Assurance of external staff

Where staff from external organisations are working with our organisation, we ensure that a letter of assurance / service level agreement is received which confirms that the relevant checks are in place, including a barred list check if the individual is working in regulated activity. An enhanced DBS certificate, which includes barred list information, is required for any staff who will be engaging in regulated activity (working unsupervised with children). This is required for any staff employed since 2002. Identity checks are also completed.

Any external agency staff are required to read the Foundation's safeguarding and related policies before commencing work and will be asked to sign to confirm this is complete.

External agencies / Hiring facilities

Currently Swindon Town FC Community Foundation do not hire Community Foundation equipment or facilities to external organisations or sub-contractors.

20. Further Reading

This policy and set of procedures works in line with the following, which should be read in conjunction:

Guidance from the Football Association

1. 'Working Together to Safeguard Children 2026 (updated March 2026)'
The Foundation's policy should be read in conjunction with this document

2. The FA's Whistle-Blowing Policy

Statutory guidance for agencies working with children and young people

1. Keeping Children Safe in Education (DfE, September 2026)
2. What to do if you're worried a child is being abused' DfE (March 2015)
3. Sharing nudes and semi-nudes: how to respond to an incident (overview) (updated March 2024 Updated 24

Legislation

1. Children Act 1989 and 2004
2. Safeguarding Vulnerable Groups Act, 2006

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Linked Swindon Town FC Community Foundation policies

1. Staff and volunteer code of conduct
2. Trips and residentials
3. Complaints policy
4. Safe Recruitment Policy
5. Anti Bullying Policy
6. Whistle-Blowing Policy
7. Use of Images Policy

Appendix

Safeguarding and Child Protection Concern / Disclosure / Incident Form

CONFIDENTIAL

Date:		**Name and role of person completing this form:**	
Time:		**Date and time read by the Designated safeguarding Officer:**	
Name of child:		**DOB (if known)**	
Location			
Details of concern / disclosure / incident			

Action taken:
Outcome :

Appendix 2

Definitions of Abuse (Keeping Children Safe in Education (DfE, September 2025))

All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Physical abuse: A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse: The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill- treatment of another. It may involve serious bullying (including cyberbullying), causing children

frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. 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. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

Neglect: 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. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
Specific safeguarding issues

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger.

All staff should be aware that safeguarding issues can manifest themselves via Child on child abuse. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and sexual harassment
- sexting (also known as youth produced sexual imagery)
- initiation/hazing type violence and rituals

Child on child Abuse: All staff should be clear as to the Foundations policy and procedures with regards to

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Child on child abuse. Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college.

All staff, but especially the designated safeguarding lead (and deputies) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors, so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

21. Prevent

STFCCF is committed to fulfilling its responsibilities under the Prevent Duty by safeguarding children, young people, and adults at risk from radicalisation and extremism. The organisation recognises that protecting individuals from these risks' forms part of its wider safeguarding responsibilities.

Thresholds and Identification of Concern:

All staff and volunteers must remain vigilant to indicate radicalisation. Concerns may range from low-level indicators (such as changes in behaviour, language, or expressed views) to more serious concerns involving exposure to or engagement with extremist ideology. Any concern, regardless of perceived severity, must be taken seriously and acted upon in line with this policy.

Reporting and Information Sharing:

Concerns relating to radicalisation or extremism must be reported promptly to the Designated Safeguarding Officer (DSO) or appropriate safeguarding officer. Information will be shared on a need-to-know basis, in line with safeguarding, data protection, and information-sharing principles, ensuring that concerns are handled sensitively, proportionately, and without delay.

Escalation of Concerns:

Where concerns meet the threshold for external intervention, the DSO will make appropriate referrals to relevant agencies, which may include local safeguarding partnerships or Prevent/Channel programmes. In cases where there is an immediate risk of harm, emergency services will be contacted without delay. All decisions and actions taken will be clearly recorded.

Training and Awareness:

STFCCF ensures that all staff and volunteers receive appropriate Prevent Duty training as part of their safeguarding responsibilities. This includes understanding the signs of radicalisation, how to respond to

concerns, and the procedures for reporting and escalation. Training is refreshed regularly to ensure knowledge remains current.

Use of IT and Online Safety:

STFCCF is committed to preventing access to terrorist and extremist material through its IT systems. Appropriate filtering and monitoring systems are in place on all organisational devices and networks. The organisation conducts periodic checks of web filtering and monitoring reports to ensure controls remain effective and to identify any potential concerns.

Monitoring and Review:

This section will be reviewed regularly to ensure compliance with current legislation, guidance, and best practice relating to Prevent Duty.

22. Equality, Diversity and Inclusion Policy

Football is for everyone, it belongs to, and should be enjoyed by anyone who wants to participate in it, whether as a player, official, staff member, volunteer or spectator. Swindon Town FC Community Foundation recognises that providing equality of opportunity, valuing diversity and promoting a culture of inclusion are vital to our success.

We want our staff, coaches, volunteers and participants to reflect the diversity of the communities that we serve and influence. We aim to be a place where people can be free to be themselves no matter what their identity or background. We will ensure that equality is embedded in all of our activities, policies and decisions.

To report incidents and allegations of discriminatory actions or behaviour, our equality, diversity and inclusion policy is available at www.stfcfoundation.com