



SECTION	SAFEGUARDING
POLICY/PROCEDURE	CHANGING FACILITIES POLICY
DATE OF ISSUE	FEBRUARY 2021
DATE OF REVIEW	FEBRUARY 2022
VERSION	1

1. ABOUT THIS POLICY

Children and young people are entitled to respect and privacy and especially when in state of undress, changing clothes, bathing/showering or undertaking any form of personal care. LCFC takes its duty of care towards young people very seriously and, as there are no legal requirements regarding the use of changing rooms, has developed this practice guidance which must be adhered to by all adults working with or supporting the delivery of activities for children and young people irrespective of their role or employment status.

Staff must be vigilant about their own behaviour, ensure they follow this policy and guidance and be mindful of the needs of participants. Any concerns about adult behaviour or about the behaviour of young people should be reported to a designated Safeguarding Person in accordance with LCFC's Safeguarding Policy (see Appendix 1 for designated staff and contact details). Designated safeguarding staff can also provide guidance where any operational issues or exceptional circumstances arise, or new arrangements are being considered.

This policy covers the following age groups:

- Pre-Academy; and
- Under 9 to under 18s.

2. CHANGING ROOM ARRANGEMENTS

Ideally groups of children should have sole use of changing facilities. This reduces the risks and potential vulnerability associated with mixing adults or other young people (known or unknown to them) when changing or showering. Where the facilities being used are not owned by or managed by LCFC, arrangements must be considered to reduce any potential risks or concerns. The following should be explored in advance as part of any planning for activities:

- Is there a separate room or space available for the group?
- Can a specific time slot be negotiated for the group, and for coaches and volunteers to have exclusive use of the changing rooms? By agreeing a very clear timetable the risks associated with any extended contact between adults/unknown groups and children are minimised.
- If not, can an area of the changing facility be designated for the group with no other people being allowed to access that area through it being cordoned off and the use of signage?
- Ensure children and parents are aware that they can always choose the option of changing at home before and after activities if they are self-conscious, anxious or have difficulties in relation to undressing/changing in front of others.

3. CHANGING ROOM SUPERVISION

If mixed use of any changing facility by adults and children is unavoidable, at least two members of staff (who have been subject to appropriate safe recruitment checks in line with LCFC's Recruitment and Selection Policy and are of the same



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gender as the children involved) should supervise the group. It is important for staff and volunteers to balance the need for adult supervision with the rights of children and young people to privacy in this context. The need for supervision is clear where there are concerns about harmful behaviour and where children are too young to be left alone or to change themselves. Arrangements will be made to ensure that all children aged 8 or under will be supervised in changing rooms within LCFC activities in line with UK childcare legislation and NSPCC guidelines. With children under 9, and where it has been decided that supervision is required for older groups of children, at least two adults should be present even with smaller groups. All supervising people must themselves be aged 18 or over. This ensures that no adult works with children in this context in isolation and also provides for cover in the event of an incident or accident where one supervisor is no longer available to the group. The ratios of adults to children should be a minimum of two but in addition:

- 4-8 years = 1 adult to every six children
- 9-12 years = 1 adult to every eight children
- 13-18 years = 1 adult to every ten children

Staff should not take responsibility for changing children or performing any personal care unless in an emergency which should be recorded and reported to the Club's Designated Safeguarding Officer. Where the group includes any child with disabilities (including learning and communication differences such as autism) prior agreement should be secured in writing from parents/carers about how additional support and assistance can be provided.

4. PARENTAL RESPONSIBILITY AND PARENTS AS SUPERVISORS

Parents and carers should be clearly informed about the level of supervision provided by staff within any LCFC activities so that expectations about supervision, including the use of changing rooms and shower areas, are clear. Where changing areas are unsupervised, and the Club has made parents aware of this, it is the responsibility of parents/carers to judge whether it is safe for their child to attend or to ensure that supervision suitable for their child's support needs that have been formally agreed with the Club are arranged. They will need to consider their child's developmental maturity, any known additional support needs/existing vulnerabilities and their child's awareness of personal safety and potential risks.

Parents are responsible for the supervision of their child up until activities start and any shared responsibility that they take on by agreement with relatives, other parents or friends are a private arrangement outside of LCFC's responsibilities.

If parents undertake any supervisory role at the request of or agreement of LCFC's staff however, which includes any responsibility for other people's children, the same safe deployment steps should be taken as for staff and volunteers to assess their suitability for the role.

Staff/supervising adults should:

- Avoid any physical contact when children are in a state of undress
- Avoid any visually intrusive behaviour
- When entering changing areas, announce their intention of entering by knocking on the door and asking the children if it is acceptable to enter



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- Follow the match preparation times

Staff/supervising adults should not:

- Change in the same place as children
- Shower with children
- Assist with any personal task which a child can undertake themselves

5. USE OF MOBILE PHONES IN CHANGING AREAS

A growing number of incidents involving inappropriate or illegal photography of children in changing and shower areas of sports and leisure facilities are being reported. Some incidents clearly involve an individual with poor intent deliberately targeting a vulnerable child to take and misuse images. These images may be uploaded to social media or shared with other likeminded individuals or groups motivated by sexual interest. Occasionally, these images are also used to threaten and force the child into harmful activities. Taking and sharing images like this may form part of wider bullying of the targeted young person by other young people, motivated more by a wish to cause humiliation and embarrassment. Even in the context of a shared joke among friends, without abusive intent, a young person taking and sharing inappropriate images may be committing a serious offence and risk criminal prosecution. It can be difficult to be sure whether someone using a mobile phone is actually taking photos or videoing their environment. In order to deter photography in changing and shower areas, LCFC therefore bans the use of mobiles and other equipment capable of taking images altogether from these areas in order to minimise risks. ban covers participants, spectators, all staff and volunteers.

The Club will treat any concerns which relate to photography in changing areas as a serious safeguarding risk and any concerns should be immediately reported to a safeguarding officer in accordance with the Club's safeguarding policies (see section 6 below which provides names of designated safeguarding staff and contact details).



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6. INTERNAL SAFEGUARDING CONTACTS

Senior Safeguarding Manager

Liam Scully

Chief Executive officer

01522 880011

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Club Designated Safeguarding Officer

Richard Parnell

Head of Legal and Governance

01522 880011 / 07508 698127

rpar@theredimps.com

Academy Designated Safeguarding Officer

Paul Metheringham

Academy Operations and Safeguarding Manager

01522 880011 / 07889 575129

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Foundation Designated Safeguarding Officer

Raj Randhawa

Head of Community

01522 563792 / 07736 900331

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Match Day

Damian Froggatt

Head of Business Operations

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7. EXTERNAL SAFEGUARDING CONTACTS

EFL Head of Safeguarding

Alexandra Richards
Safeguarding Manager
01772 325940 / 07792 284740
arichards@efl.com

Lincolnshire County FA

Sarah Pridmore
Designated Safeguarding Officer
07973 666778
sarah.pridmore@lincolnshirefa.com / safeguarding@lincolnshirefa.com

Lincolnshire Customer Service Centre

01522 782111

Out of Hours Emergency

01522 782333

Police

If you have concerns requiring the Police's immediate action, dial 999.