

Independent audit of the implementation of the

# FA Safeguarding Operating Standards

within County FAs

By Girling Hughes Associates Ltd  
for The Football Association

Liverpool CFA

5<sup>th</sup> April 2018



## Contents

Introduction.....	2
Safeguarding Operating Standards .....	2
Self-Assessment.....	2
Liverpool CFA – Data Information .....	3
Liverpool CFA – Funding.....	3
Liverpool – Initial Assessment .....	3
Findings.....	4
Final Assessment .....	4
CFA Assessment - Results .....	6
Initial Assessment - Results .....	7
Final Assessment - Results .....	8
STANDARD 1 – Governance.....	9
STANDARD 2 – Operating Standards.....	10
STANDARD 3 – County FA run events and activities .....	11
STANDARD 4 - Planning, delivering, and communicating safeguarding policy, education and support .....	12
STANDARD 5 - Football disciplinary .....	13
STANDARD 6 - Case management.....	14
STANDARD 7 - Compliance monitoring of affiliated clubs .....	15
Conclusion .....	16

## Introduction

Girling Hughes Associates Ltd (GHAss) is a small team with a specialism in safeguarding. The team comprises individuals with a background in law enforcement, child protection, education and social services, who have experience of working with UK based and global organisations, delivering quality safeguarding advice and training.

GHAss was tasked by The Football Association to assess the safeguarding procedures followed by each County Football Association and their alignment to the Football Association's Safeguarding Operating Standards. GHAss operated as independent assessors.

## Safeguarding Operating Standards

The Football Association has developed Safeguarding Operating Standards to ensure a consistent delivery of safeguarding across grassroots football. These Standards were conveyed to the County Football Associations in September 2017. The Standards are underpinned by government guidance and aligned to the Sport England/NSPCC national standards for safeguarding and protecting children and young people in sport.

To support County Football Associations, the operating manual 'Safeguarding in Football, a guide to the Safeguarding Operating Standards for County FAs', contains key information and signposts to the resources County Football Associations need to meet the Operating Standards.

The Safeguarding Operating Standards manual contains the following sections and Standards:

Section	Number of Standards
Governance	14
Operating Standards	32
County FA run events and activities	4
Planning, delivering, and communicating safeguarding policy, education and support	7
Football disciplinary	2
Case management	5
Compliance monitoring of affiliated clubs	7

*The independent assessors did not develop the standards.*

## Self-Assessment

The starting point of the process was for each CFA to assess themselves against the Safeguarding Operating Standards and reflect on this self-assessment with their Senior Regional Manager. This was fundamental to the processes that followed. The self-assessment was recorded on a Smartsheet which is licensed and administered by The Football Association.

In order to support their self-assessment, the CFA were invited to upload relevant documents, linked to individual Standards onto the Smartsheet.

Liverpool County Football Association completed the self-assessment uploaded 613 documents to evidence their work.

### **Liverpool CFA – Data Information**

Liverpool CFA has the following affiliations:

	<b>CFA data</b>	<b>FA data</b>
Clubs	533	
Teams	2,500	
Male adult teams	626 (approx. 740 by end of 2017)	
Female adult teams	34	
Male youth teams	983 (approx. 1100 by end of 2017)	
Female youth teams	105	
Male Disability teams	111	
Female Disability teams	21	
Mini soccer teams	947 (approx. 1000 by end of 2017)	
Coaches	3,304	
Referees	606	
Under 18 referees	207	
U18 Players	25,000 (approx.)	

### **Liverpool CFA – Funding**

#### **Income/Expenditure Account for the year ended 31 Dec 2016.**

Annual income:	£1819,619
Football Association Investment:	£367,356
Expenditure on Safeguarding:	Unknown
Reserves:	£409,726 (2016)

### **Liverpool – Initial Assessment**

The assessors were allocated two days per assessment and a day to prepare the report of their findings. This included reviewing of the documentation; travel to and from the County office and the interviewing of the team. Initially the Football Association allocated one assessor per County FA but subsequently and in this case, two assessors attended.

The process for each assessment was for the assessors to contact the Chief Executive (or equivalent) a few days before the visit to agree the format for the visit.

Key members of staff were identified and a timetable for interviews mutually agreed. Assessors always aimed to be as flexible and accommodating as possible. The list of Liverpool staff identified by the assessor was:

Ian WILD:	County FA Chairman and Board Champion
David PUGH:	Chief Executive Officer

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Gordon JOHNSON:	Designated Safeguarding Officer
Tony SMITH:	Senior Football Development Officer (Deputy DSO)
Dave HORLICK:	Referee Development Manager
Steve SWINNERTON:	Senior Football Services Manager (Deputy SSL)
Anna FARRELL:	Football Development Officer (Women & Girls and Marketing & Comms.)
Wayne WARDLE:	Football Development Officer (Player and Coach)
Mark HORLICK:	Football Development Officer (Disability)

## Findings

For the initial assessment, **each** individual Standard was graded according to the following criteria:

Category 1 – <b>Green</b>	Meets this Standard
Category 2 – <b>Amber</b>	Aspects of this Standard are not met
Category 3 – <b>Red</b>	Does not meet this Standard

Liverpool CFA was assessed in Phase 1.

A report containing points requiring development in order to reach an acceptable standard of safeguarding was provided for Liverpool.

At the end of Phase 1, it was agreed with the Football Association that the **overall** outcome of the initial assessment would fall into one of the following categories:

Category 1 – <b>Green</b>	Meets most Standards and has systems/processes in place to meet the remainder
Category 2 – <b>Amber</b>	Meets some Standards but a number require further development
Category 3 – <b>Red</b>	Fails to meet a significant number of Standards and does not have robust processes in place

***Liverpool CFA would have been assessed as Category 2 – **Amber** – Meets some Standards but a number require further development.***

## Final Assessment

Each CFA was permitted a minimum of 28 days to respond to the Development Plan. During this time the CFA was able to communicate with the assessors for support and to upload further documents to the SmartSheet to evidence progress.

During this time, an additional 60 documents were uploaded to the Smartsheet.

The final assessment is carried out either during a personal visit or via a telephone conversation with key personnel at the CFA at the discretion of the assessors.

Liverpool CFA received a telephone call for their final assessment. This was carried out on Friday 16<sup>th</sup> March 2018. The call took place with David PUGH (CEO) and Gordon JOHNSON (DSO) and both of the initial assessors.

Liverpool CFA were then given a further 5 days to complete the assessment.

Following the call on the 16<sup>h</sup> March 2018 and the additional five days, the assessor reviewed all the material provided and a final grade was given for each Standard as per the interim assessment, plus outcome grades for each of the seven areas in which the Standards sit. These outcome grades were set according to the following criteria:

Category 1 – <b>Green</b>	Pass
Category 2 – <b>Amber</b>	Conditional pass*.
Category 3 – <b>Red</b>	Fail

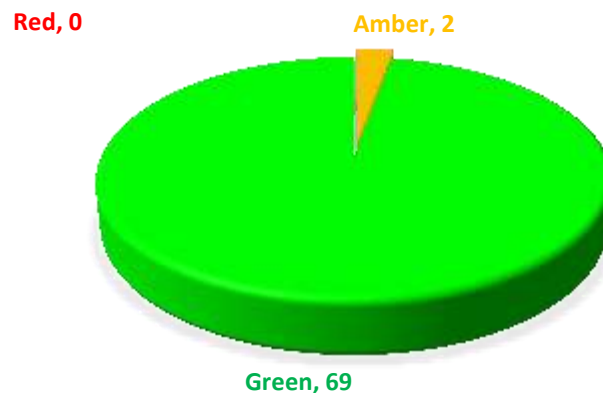
\*It was agreed with The Football Association that there were eight Standards which could remain Amber assuming action was being undertaken by the CFA to prove that these would be addressed by the end of the current season.

The following charts show the results for the CFA Assessment, the Interim Assessment and the Final Assessment for each of the seven Standards.

## CFA Assessment - Results

Standard	Total	Red	Amber	Green
Governance	<b>14</b>	0	0	14
Operating Standards	<b>32</b>	0	1	31
County FA run events and activities	<b>4</b>	0	0	4
Planning, delivering, and communicating safeguarding policy, education and support	<b>7</b>	0	0	7
Football disciplinary	<b>2</b>	0	1	1
Case management	<b>5</b>	0	0	5
Compliance monitoring of affiliated clubs	<b>7</b>	0	0	7
<b>TOTALS</b>	<b>71</b>	<b>0</b>	<b>2</b>	<b>69</b>

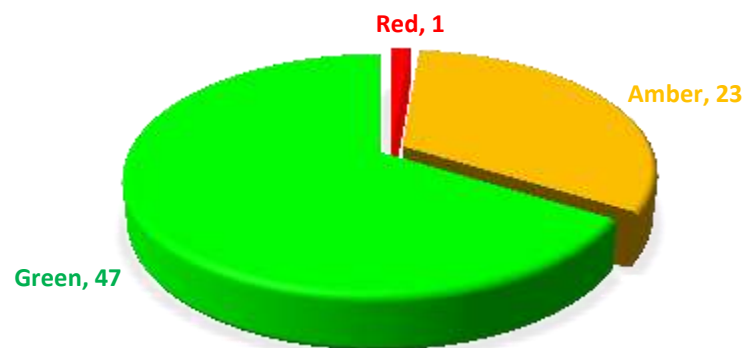
## LIVERPOOL SELF-ASSESSMENT, GRADE SPREAD



## Initial Assessment - Results

Standard	Total	Red	Amber	Green
Governance	14	0	3	11
Operating Standards	32	1	11	20
County FA run events and activities	4	0	3	1
Planning, delivering, and communicating safeguarding policy, education and support	7	0	4	3
Football disciplinary	2	0	0	2
Case management	5	0	2	3
Compliance monitoring of affiliated clubs	7	0	0	7
<b>TOTALS</b>	<b>71</b>	<b>1</b>	<b>23</b>	<b>47</b>

## LIVERPOOL INITIAL ASSESSMENT, GRADE SPREAD





## Final Assessment - Results

Standard	Total	Red	Amber	Green
Governance	14	0	0	14
Operating Standards	32	0	0	32
County FA run events and activities	4	0	0	4
Planning, delivering, and communicating safeguarding policy, education and support	7	0	0	7
Football disciplinary	2	0	0	2
Case management	5	0	0	5
Compliance monitoring of affiliated clubs	7	0	0	7
<b>TOTALS</b>	<b>71</b>	<b>0</b>	<b>0</b>	<b>71</b>

### LIVERPOOL FINAL ASSESSMENT, GRADE SPREAD

Red, 0

Amber, 0



Green, 71

## STANDARD 1 – Governance

### Areas of strength:

- All Board members have signed the Safeguarding Commitment Form
- SSL has completed standard safeguarding training and has sourced and attended additional external courses
- SSL has oversight of safeguarding responsibilities, financial responsibilities and planning requirements. There is a team in place and the organogram shows delegated roles and lines of accountability.
- Strong line management structure includes deputies and clear responsibilities for all roles. Full commitment to safeguarding from Chair through to all staff.
- Whole team attended a meeting with the Youth Council. YC very keen to have more involvement. YC member has attended Council meetings and this will continue. YC will address the relevant issues arising from the FA survey on communication
- Safeguarding features in all Board meetings. Good, clear information on whistle-blowing plus processes in place for managing allegations against staff and volunteers. This was immediately revised following discussions.

### Areas for further development:

- In discussion: working with Wild Cats to generate new ideas/materials etc - with offers of kit prizes, footballs etc.

### Standard 1 overall:

Category 1 – **Green** - Pass

R	A	G
0	0	14

## STANDARD 2 – Operating Standards

### Areas of strength:

- Clear processes in place in the Policy for Managing Allegations against Staff and Volunteers
- There is evidence to demonstrate that since the introduction of the safeguarding standards, the principle of safeguarding is considered as part of all activities.
- Improved risk assessments have strong safeguarding content. These will be used for all events involving U18s
- DSO has attended a number of additional training courses provided by the LSCB. In addition, now working as a 'partnership' with the LSCB who will use LFA facilities to run courses, amongst other things
- Good contacts with appropriate agencies. DSO understands own areas of strength.
- Communication lines are strong
- The DSO now works within the CEO's office. This has a number of benefits including: confidentiality, CEO up to date at all times with incoming issues etc.
- Recruitment processes are strong.
- A strong data cleansing process has resulted in the validation visits showing up few issues and no real concerns.
- Initial training for U28 referees is strong and safeguarding is prominent. There is a mentor system in place.
- There is a real desire to improve communication with children and young people.
- Localised Game Changer Survey highlighted need for more Girls football in schools. This has been addressed using School Games Organisers.

### Areas for further development:

- Consider a variety of opportunities for speaking with children e.g. during validation visits, using children to work on short projects (designing posters, re-wording material etc.), competitions etc.

### Standard 2 overall:

Category 1 – **Green** - Pass

R	A	G
0	0	32

### STANDARD 3 – County FA run events and activities

**Strengths:**

- U18s are given all necessary information
- All events are risk-assessed – this will be stronger with the safeguarding content of new risk assessment form
- SLAs in place where necessary. New risk assessment will be added to these

**Areas for further development:**

- Information is given in formal formats. Consider leaflets, posters on toilet doors etc. as alternative ways of communicating essential safeguarding information.

**Standard 3 overall:**

**Category 1 – Green - Pass**

R	A	G
0	0	4

## STANDARD 4 - Planning, delivering, and communicating safeguarding policy, education and support

### Strengths:

- Education is in place and safeguarding is delivered
- Service improvement plans are 'owned' by staff with responsibility for each area. The needs are fed into the Operational Plan to ensure that an appropriate education programme is in place.
- Introductory Text (three/four line):
- LCFA hosted a CPD evening for junior football club welfare officers at their Walton Hall Park offices on Thursday 26th January 2017 attended by 30 club welfare officers from across the County FA area. Keynote speaker from the Local Authority.
- Local football clubs host The FA Safeguarding Children Workshops for the club coaches and committee.

### Areas for further development:

- More safeguarding content in the Service Improvement Plans will secure ongoing safeguarding development
- Focus on getting feedback from children and young people

### Standard 4 overall:

R	A	G
0	0	7

Category 1 – **Green** - Pass

## STANDARD 5 - Football disciplinary

<b>Strengths:</b>								
<ul style="list-style-type: none"> <li>The CFA DSO is involved in all disciplinary matters</li> <li>Processes are in place to support U18s involved in discipline procedures</li> </ul>								
<b>Areas for further development:</b>								
<ul style="list-style-type: none"> <li></li> </ul>								
<b>Standard 5 overall:</b>		<table border="1"> <tr> <td>R</td><td>A</td><td>G</td></tr> <tr> <td>0</td><td>0</td><td>2</td></tr> </table>	R	A	G	0	0	2
R	A	G						
0	0	2						
<b>Category 1 – Green – Pass</b>								

## STANDARD 6 - Case management

### Strengths:

- All poor practice cases are discussed, and documents reviewed
- Only 'live' cases are kept in files on the premises. Once case is uploaded onto ELSA, hard copy is shredded.
- Information sharing between the DSO and the FA CMT is good and carried out appropriately and quickly

### Areas for further development:

- Use Net Promoter for identifying training gaps, targeted at specific safeguarding concerns that have arisen from poor practice.

### Standard 6 overall:

Category 1 – **Green** – Pass

R	A	G
0	0	5

## STANDARD 7 - Compliance monitoring of affiliated clubs

### Strengths:

- Strong data cleansing process. Clubs given a period of time to comply and then will be removed from league if remain non-compliant
- There is a calendar of scheduled and targeted club validation visits involving all CFA staff.
- Data is used to ensure compliance

### Areas for further development:

- 

### Standard 7 overall:

Category 1 – **Green** – Pass

R	A	G
0	0	7



## Conclusion

***Following the final assessment, Liverpool County Football Association was assessed as Category 1 – **GREEN** – Pass***

Section	Final Grade
Governance	Green
Operating Standards	Green
County FA run events and activities	Green
Planning, delivering, and communicating safeguarding policy, education and support	Green
Football disciplinary	Green
Case management	Green
Compliance monitoring of affiliated clubs	Green

In the opinion of the assessors, Liverpool County Football Association has fully and systematically embedded safeguarding within its governance structures and operational practices. Therefore, we are able to categorise them as Green.

There are many areas of real strength and others which will improve with continued development.

Between the initial assessment and final assessment 24 Standards have been raised to Green.

During the initial assessment and the follow-up 'phone calls, staff at Liverpool CFA demonstrated an impressive understanding of safeguarding, a willingness to adopt new practices and were open to suggestions for improvements.

David has a clear vision for the future of Liverpool CFA and it was apparent during the visits that the staff have 'bought into' this vision and that safeguarding is a high priority. There is a very strong desire on the part of all staff to 'be the best' and ensure that LCFA provides a safe environment for children and young people.

The Safeguarding Operating Standards have stimulated a concerted focus in Liverpool on raising the profile of safeguarding and the impact on U18 participants. Liverpool County Football Association have worked for many years with good practices. However, their desire to improve processes and upskill staff and volunteers means that they see their current work with safeguarding as being "part of the journey to ensure all youngsters are safe". This approach should ensure their work goes from strength to strength.

The assessors would like to thank David and his team for their warm welcome and for their desire to embrace the process and maximise the benefits from it.

Submitted

GirlingHughes Associates Ltd