



<b>SECTION</b>	SAFEGUARDING
<b>POLICY/PROCEDURE</b>	CHANGING FACILITIES POLICY
<b>DATE OF ISSUE</b>	AUGUST 2024
<b>DATE OF REVIEW</b>	AUGUST 2025
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## 1. ABOUT THIS POLICY

Children and young people are entitled to respect and privacy and especially when in a state of undress, changing clothes, bathing/showering or undertaking any form of personal care. Lincoln City Football Club (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 one of the Club's designated safeguarding officers, whose contact details are set out in section 6 below. The designated safeguarding officers 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 adhered to in advance as part of any planning for activities:

- Adults must not change or shower at the same time using the same facility as children.
- Agreements should be made in advance of an event to form a very clear timetable for the use of changing facilities by coaches, adults, children, and parents/guardians to ensure that the risks associated with any extended contact between adults/unknown groups and children are minimised.
- If required, an area of the changing facility must be designated for the group with no other people being allowed to access that area through it being cordoned off alongside the use of signage.
- Mobile phones must not be used in changing rooms.
- Mixed gender teams must have access to separate changing rooms.
- If children are to play for adult teams, their parents/guardians must be informed of the Club's policy on changing arrangements.
- Ensure children and parents/guardians 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.



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Academy players have their own shirts but trialists are provided with a shirt for fixtures. If players have to take off layers to put their shirt on (e.g. in the warmer months), we recommend that if there is a changing facility available, the player is sent there to change, ensuring that there is a changing space and a spare member of staff to go with them. If not, we should ensure that there is an indoor space on site for the player's parent or guardian to assist the player to change (the colder months are not usually an issue as the shirt goes on top of layers).

### **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 Safer Recruitment Policy and are of the same 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 Academy 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.



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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
- 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 like-minded 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. The 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 the names of the Club's designated safeguarding officers and contact details).



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## 6. INTERNAL SAFEGUARDING CONTACTS

### Senior Safeguarding Manager

Richard Parnell  
01522 880011 / 07508 698127  
[rpar@theredimps.com](mailto:rpar@theredimps.com)

### Club Designated Safeguarding Officer

Matthew Murgett  
07908 829499  
[mmur@theredimps.com](mailto:mmur@theredimps.com)

### Academy Designated Safeguarding Officer

Mark Johnson  
07948 726409  
[mjoh@theredimps.com](mailto:mjoh@theredimps.com)

### Women's Club Welfare Officer

Joanna Manning  
07970 560430  
[joannamanning@aol.com](mailto:joannamanning@aol.com)

### Foundation Designated Safeguarding Officer

Alex Bavin  
01522 563792 / 07736 900336  
[alex.bavin@lincolncityfoundation.co.uk](mailto:alex.bavin@lincolncityfoundation.co.uk)

## 7. EXTERNAL SAFEGUARDING CONTACTS

### EFL Head of Safeguarding

Alexandra Richards  
01772 325940 / 07792 284740  
[arichards@efl.com](mailto:arichards@efl.com)

### EFL Safeguarding Regional Manager

Mark Derrien  
07944 272236 / 01772 376798  
[mderrien@efl.com](mailto:mderrien@efl.com)

### Lincolnshire County FA

Ben Pearce  
Designated Safeguarding Officer  
01522 596580  
[Ben.Pearce@lincolnshirefa.com](mailto:Ben.Pearce@lincolnshirefa.com) / [safeguarding@lincolnshirefa.com](mailto: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.