



**AFC CHILD SAFEGUARDING  
POLICY**  
2022 Edition

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# 1. Introduction

As defined in the United Nations Convention on the Rights of the Child (1989), every Child has *“the right to live free from violence, exploitation and abuse”*.

The AFC champions the rights of all Children to be safe from abuse while participating in AFC programmes and activities.

This Policy is part of the AFC’s overall commitment to safeguard Children within the AFC football ecosystem and will be supplemented with further guidance, templates, knowledge-sharing and training to support Employees, Representatives, Member Associations and Regional Associations together with regional and community organisations.

The purpose of this Policy is to outline the responsibilities and obligations of Employees and Representatives with regard to Child Safeguarding, including through adherence to the following principles:

1. Act in the Child’s best interests by promoting and prioritising the safety and wellbeing of Children;
2. Value, respect and listen to Children, allowing them the right to participate and freely express their opinions in matters affecting them;
3. Ensure all Children are never subjected to any form of discrimination concerning race, skin colour, gender, disability, language, physical appearance, religion, political opinion, wealth, birth or any other status, sexual orientation, or ethnic, national, or social origin; and
4. Uphold and promote a culture of Child Safeguarding regardless of function, level or position.

The Policy is an evolving document that will be updated as needed to reflect legislative and best practice changes, in addition to feedback and consultation relating to the practical experience of the persons and/or organisations within the AFC football ecosystem.

# 2. Definitions

In this Policy, capitalised terms shall have the following meanings, unless the context specifically indicates otherwise:

Term	Definition
Bullying	Bullying involves the inappropriate use of power by one or more persons over another less powerful person or group and can be by an adult, another Child or by a group. Bullying is typically a pattern of inappropriate

	<p>behaviour repeated over time. Bullying may take many forms that are often interrelated and can include:</p> <ul style="list-style-type: none"> <li>• verbal bullying including name calling, demeaning actions and threats;</li> <li>• physical bullying including hitting, punching, kicking, scratching, tripping and spitting;</li> <li>• social bullying including ignoring, excluding, ostracising and, alienating; and/or</li> <li>• psychological bullying including spreading rumours, stalking, dirty looks, hiding or damaging possessions.</li> </ul> <p>For the avoidance of doubt, bullying also includes cyber bullying, which can also have lasting and damaging consequences. Cyber bullying is usually done via the internet, social media, SMS, MMS, email or other online platform(s).</p>
Child	A person who is under the age of 18 years. The term “Children” shall be construed accordingly.
Child Abuse	<p>Child Abuse is the mistreatment of a Child by an adult that has harmed, is harming or is likely to harm, endanger or put at risk that Child’s physical or emotional health, development or wellbeing.</p> <p>For the avoidance of doubt, this includes, but is not limited to:</p> <ul style="list-style-type: none"> <li>• Emotional or Psychological Abuse;</li> <li>• Bullying;</li> <li>• Grooming;</li> <li>• Sexual Abuse;</li> <li>• Neglect; and/or</li> <li>• Physical Abuse.</li> </ul>
Child Safeguarding	Child Safeguarding is the set of actions an organisation can take to keep Children safe from harm. It is a broad term encompassing, amongst other things, the prevention of Child Abuse.
Emotional or Psychological Abuse	<p>Emotional or Psychological Abuse occurs when a Child does not receive the support or attention they need for healthy emotional, psychological and social development.</p> <p>Such abuse may involve repeated rejection or threats to a Child. Constant criticism, teasing, ignoring, threatening, yelling, scapegoating, ridiculing and rejection or continuous apathy are all examples of emotional abuse.</p> <p>These behaviours can result or have the potential to result in significant damage to the Child’s physical, intellectual or emotional wellbeing and development.</p>

Employee(s)	All persons engaged in full or part-time service with the AFC under a contract of employment (whether on a permanent, fixed term or other basis). This includes, without limitation the AFC General Secretary, AFC Deputy General Secretaries, AFC Directors, Heads of Department/Unit and all other AFC staff members.
Football Association	The controlling body for football within a country or territory recognised by the AFC.
Member Association	A Football Association which is a member of the AFC.
Grooming	<p>Grooming is a term used to describe what happens when a perpetrator of abuse builds a relationship with a Child with an intent to abuse them at some stage. There is no set pattern in relation to the Grooming of a Child. For some perpetrators, there will be a lengthy period of time before the abuse begins.</p> <p>The Child may be given special attention and/or be treated favourably and what starts as an apparently normal interaction, such as tickling, or physically embracing a Child, can develop into sexualised behaviours including Sexual Abuse of a Child.</p> <p>Grooming can take place in any setting where a relationship is formed, such as leisure, music, sports and religious activities, or in internet chat rooms, in social media or by other technological channels.</p>
Neglect	<p>Neglect is the failure to provide the Child with basic needs including but not limited to food, clothing, shelter, adequate supervision, clean water, medical attention or supervision to the extent that the Child's health and development is, or is likely to be harmed.</p> <p>Categories of Neglect include physical neglect, medical neglect, abandonment or desertion, emotional neglect and educational neglect. The issue of neglect must be considered within the context of resources reasonably available at the time.</p>
Physical Abuse	Physical Abuse occurs when a person subjects a Child to non-accidental injury and/or physically aggressive acts. The abuser may inflict an injury intentionally or inadvertently as a result of physical punishment or the aggressive treatment of a Child. Physically abusive behaviour includes, but is not limited to:

	<ul style="list-style-type: none"> <li>• shoving, hitting, kicking, slapping, shaking, throwing, punching, biting, burning; and/or</li> <li>• excessive and/or physically harmful overtraining.</li> </ul> <p>It also includes giving Children unlawful or harmful substances such as drugs, alcohol, poison, tobacco or e-cigarettes.</p>
Policy	This AFC Child Safeguarding Policy.
Regional Association	A group of Member Associations recognised by the AFC that belong to the same geographic zone.
Representative (s)	<p>All persons who are elected, appointed, authorised and/or assigned by the AFC to carry out a function and/or who otherwise represent the AFC in an official capacity. This includes, without limitation, the AFC President, the members of the AFC Executive Committee and other AFC Committees, all persons appointed to exercise an official function for, or on behalf of, the AFC at any match, competition, function, course or other events organised by the AFC, and any volunteers engaged by the AFC in connection with its events and competitions.</p> <p>This definition shall also extend to contractors, consultants, service providers and others who may be temporarily engaged in the performance of work or services for the AFC.</p>
Sexual Abuse	<p>Sexual Abuse occurs when a person involves a Child in any sexual activity. Perpetrators of sexual abuse take advantage of their power, authority, influence, or position over the Child for their own or the benefit of others. Such actions constituting Sexual Abuse shall include without limitation:</p> <ul style="list-style-type: none"> <li>• making sexual comments to a Child;</li> <li>• engaging Children to participate in sexual conversations face to face, over the internet or on social media;</li> <li>• kissing or touching any intimate part of a Child’s body including a Child’s genitals, bottom or breasts;</li> <li>• oral or penetrative sex or other forms of sexual intercourse or conduct with a Child; and/or</li> <li>• encouraging a Child to view pornographic magazines, websites and videos.</li> </ul>
Unacceptable Behaviour	Any behaviour or conduct which breaches this Policy or which is otherwise inconsistent with this Policy. Examples of Unacceptable Behaviour are outlined in Article 5.3.3.

For purposes of this Policy and provided the context so permits:

- (a) the singular shall include the plural and vice-versa;
- (b) the feminine gender shall include the masculine and vice-versa; and
- (c) reference to natural persons shall include any legal person or corporation.

### 3. Scope of Application

#### 3.1 Employees and Representatives

- 3.1.1 All Employees and Representatives are bound by this Policy.
- 3.1.2 As underlined in the definition of “Representatives”, the AFC also expects its contractors, consultants, service providers and others who may be temporarily engaged in the performance of work or services for the AFC to follow the Policy in connection with their work for the AFC. Any failure by a contractor, consultant, service provider or others engaged by the AFC to abide by this Policy may result in the termination of their relationship with the AFC.
- 3.1.3 The AFC expects all persons who are subject to and bound by this Policy to adhere to the principles contained herein. Failure to do so may result in disciplinary and/or other action being taken against the relevant individual. In appropriate cases, action may also be taken under the AFC Disciplinary and Ethics Code.
- 3.1.4 This Policy will continue to apply to a person, even after they have ceased any involvement (subject to this Policy’s terms) with the AFC, if disciplinary action against that person has commenced.

#### 3.2 Member Associations and Regional Associations

- 3.2.1 Member Associations and Regional Associations are encouraged to develop and implement effective policies and best practices aimed at ensuring the protection and safeguarding of Children at various levels of football within their respective jurisdictions.
- 3.2.2 The Policy Guidance for AFC Member Associations and Regional Associations as set out in Appendix 3 of this Policy shall serve to provide general guidance to assist Member Associations and Regional Associations in the development and implementation of their Child Safeguarding policies and practices.

## 4. Commitment Statement

- 4.1 This Policy serves to uphold the AFC's core values and recognise that the welfare and interests of Children are paramount in the AFC's programmes and activities. It aims to ensure that all Children:
- have a positive and enjoyable experience of football with the AFC in a safe and Child-centred/friendly environment; and
  - are protected from abuse whilst participating in AFC programmes and activities.
- 4.2 The AFC acknowledges that Children, including Children with impairments, disabilities and/or those from ethnic minority communities, can be particularly vulnerable to Child Abuse and we accept the responsibility to take reasonable and appropriate steps through the provision of the required manpower and resources to ensure their safety and wellbeing during AFC programmes and activities.
- 4.3 The AFC commits to the following:
- 4.3.1 Recognising and communicating to all Employees and Representatives through this Policy (and other means, where appropriate) that Children have the right to be protected from all forms of Child Abuse.
  - 4.3.2 Establishing an AFC Child Safeguarding team to oversee the implementation and development of Child Safeguarding best practices within the AFC and to liaise with Member Associations and Regional Associations in respect to Child Safeguarding matters and best practices.
  - 4.3.3 Requiring Employees and Representatives to adhere to this Policy.
  - 4.3.4 Ensuring that all allegations of Child Abuse are responded to promptly, in a confidential manner and through established reporting lines in accordance with this Policy.
  - 4.3.5 Raising awareness and influencing others on the importance of safeguarding Children by using our policies and procedures to uphold our commitment and values.
  - 4.3.6 Providing effective management for Employees and Representatives through supervision, support, training and quality assurance measures.
  - 4.3.7 Ensuring appropriate action is taken in the event of incidents or concerns of Child Abuse and that support is provided to the individual(s) who raise or disclose concerns.
  - 4.3.8 Ensuring that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored.
  - 4.3.9 Reducing the risk of employing and engaging unsuitable individuals by recruiting and selecting Employee and Representatives safely and ensuring appropriate probity and reference checks are completed.
  - 4.3.10 Sharing information about Child Safeguarding and good practice with Children and their parents.



- 4.3.11 Ensuring that Children and their parents know where to go for help if they have a concern.
- 4.3.12 Ensuring everyone within the AFC understands their roles and responsibilities in respect of Child Safeguarding and are provided with appropriate learning opportunities to recognise, identify and respond to signs of Child Abuse.
- 4.3.13 Reviewing this Policy and Child Safeguarding procedures periodically.
- 4.3.14 Striving to ensure that adequate resources are allocated to allow for the development and implementation of this Policy.
- 4.3.15 Developing opportunities for regular discussions at all levels to support a culture of openness, continuous improvement and accountability for Child protection and Child wellbeing.
- 4.3.16 Encouraging policy development and implementation amongst Member Associations and Regional Associations.
- 4.3.17 Promoting Child Safeguarding across the Asian football ecosystem.
- 4.3.18 Advocating and promoting Child rights, and empowering and engaging Children in support of this Policy and its objectives.

## 5. Codes of Behaviour

- 5.1 This section outlines the required level(s) of professional conduct that Employees and Representatives must observe when working with or in the presence of Children during any AFC programme or activity or otherwise in an AFC context. This serves to supplement the AFC's expectations as set out in the AFC Code of Conduct and Employee Handbook.
- 5.2 These requirements play an important role in setting out the AFC's expectations of:
  - 5.2.1 Personal and professional boundaries;
  - 5.2.2 Ethical behaviour; and
  - 5.2.3 Appropriate and inappropriate behaviour when working with or in the presence of Children during any AFC programme or activity or otherwise in an AFC context.

5.3 The requirements are as follows:

### 5.3.1 Core Values

The standards of behaviour which Employees and Representatives are expected to observe when working with or in the presence of Children during any AFC programme or activity or otherwise in an AFC context are based on the following core values:

- a) to act in accordance with the vision, mission and values of the AFC;
- b) to display respect and courtesy towards Children;
- c) to prevent discrimination and harassment;
- d) to prioritise the safety and wellbeing of Children; and
- e) to report any Unacceptable Behaviour to help prevent the abuse of Children in the AFC community.

### 5.3.2 General Rules of Behaviour

When working with or in the presence of Children during any AFC programme or activity or otherwise in an AFC context, Employees and Representatives shall not:

- a) use, possess or be under the influence of any illegal drug(s);
- b) use or be under the influence of alcohol;
- c) be incapacitated by any other legal drug such as prescription or over-the-counter drugs; and/or
- d) supply alcohol or drugs (including tobacco/e-cigarettes) to a Child participating in any AFC programmes/activities.

It is strongly recommended that Employees and Representatives familiarise themselves with and adhere to the Child Safeguarding Guidelines to Reduce and Mitigate Risk as set out under Appendix 2 of this Policy.

### 5.3.3 Unacceptable Behaviour

Employees and Representatives must not engage in any conduct that constitutes or may constitute Unacceptable Behaviour when working with or in the presence of Children during any AFC programme or activity or otherwise in an AFC context.

Without limitation, the following shall constitute Unacceptable Behaviour for the purposes of this Policy:

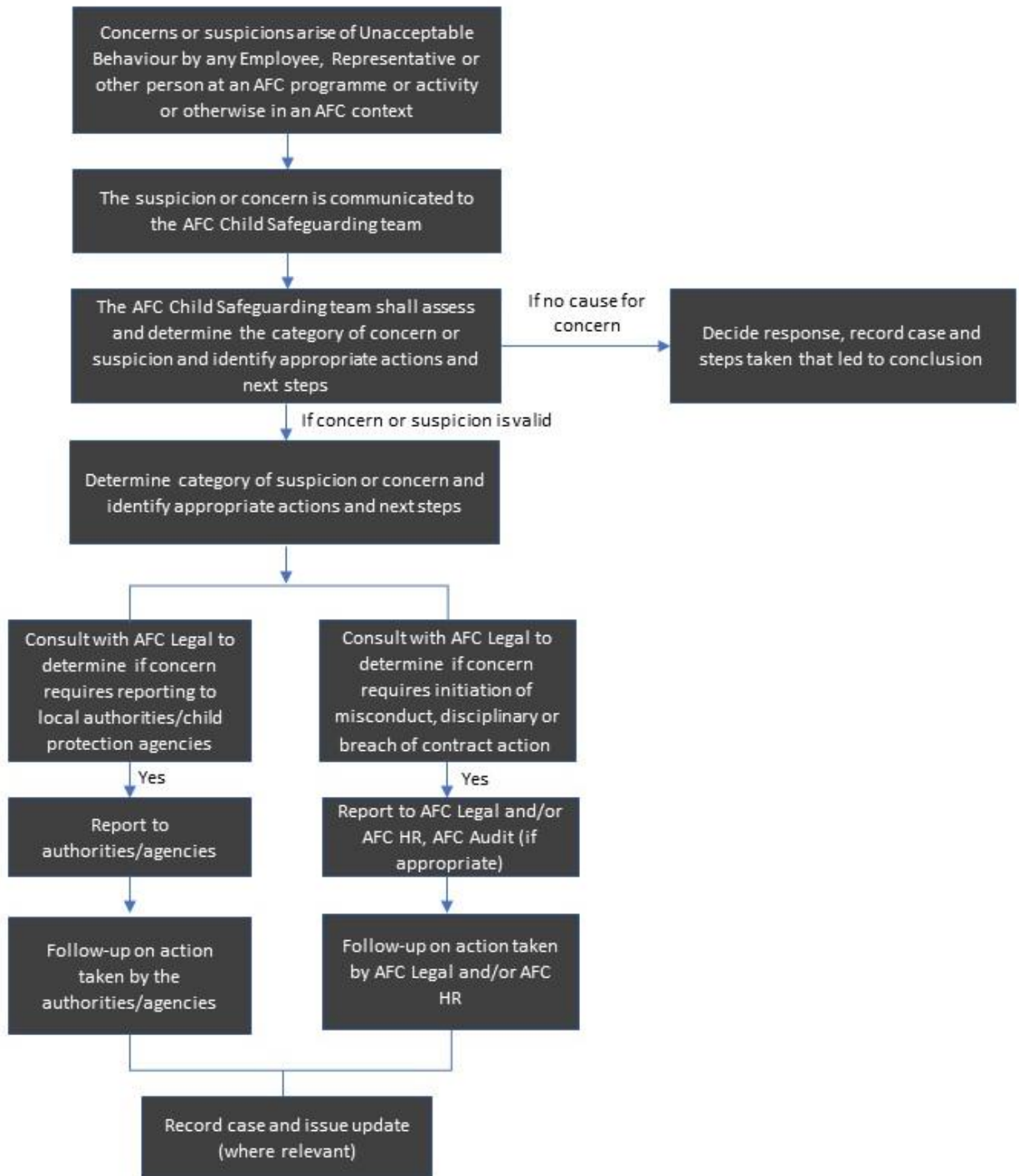
- a) any form of Child Abuse (which, for the avoidance of doubt, includes Physical Abuse, Emotional or Psychological Abuse, Bullying, Grooming, Sexual Abuse and Neglect) or similar conduct;
- b) any conduct that involves inappropriate or sexual handling of a Child, other than as part of delivering medical or allied health services, questioning or discussing sexual preference, experience or knowledge with a Child;
- c) any suggestive conduct including undressing in front of Children (including in dressing rooms, accommodation settings and bathroom areas which are in use by a Child);
- d) showing a Child any offensive written material or images, whether in hard copy or electronic form (e.g., any form of pornography including via social media platforms);

- e) taking or displaying photographs of a Child that are inappropriate, covert, and/or any photographs taken without the consent of the Child's parent or legal guardian;
- f) contacting a Child for non-work-related matters; and/or
- g) engaging in any form of communication and/or activity with a Child outside the scope of any AFC programme or activity or for non-work-related matters.

## 6. Reporting Concerns

- 6.1 Employees and Representatives must report any Child Safeguarding concerns or suspicions (i.e., regarding any Unacceptable Behaviour by any person) in a timely manner to the AFC Child Safeguarding team and, where necessary, external agencies, so that appropriate action can be taken to manage and address such concerns.
- 6.2 Employees or Representatives who fail to report any concern or suspicion of Unacceptable Behaviour shall be in breach of this Policy, and such omission may result in disciplinary and/or other action being taken against such individuals.
- 6.3 The AFC Child Safeguarding Reporting Flowchart as appended under Article 6.6 below sets out the process to be followed when managing a reported concern or suspicion that has been reported to the AFC Child Safeguarding team.
- 6.4 All concerns or suspicions of Child Abuse or Neglect involving any Employee or Representative within any AFC programme or activity or otherwise in an AFC context may be reported to the AFC Child Safeguarding team at [safeguarding@the-afc.com](mailto:safeguarding@the-afc.com). All reports shall be submitted with the AFC Child Safeguarding Incident Reporting Form as set out under Article 6.6 below.
- 6.5 For the avoidance of doubt, concerns and suspicions of Unacceptable Behaviour by third parties (i.e., not Employees or Representatives) shall still be reported to the AFC Child Safeguarding team and, where appropriate, directly to the local authorities.

## Child Safeguarding Reporting Flowchart



Notes:

When identifying appropriate action(s) and next steps, due regard must be accorded to the category of suspicion or concern reported. In so determining, the AFC Child Safeguarding team may assess the same based on the following levels of risk:

Levels of Risk	Description
Low Risk	No harm or impact to Child
Moderate Risk	Slight harm or impact to Child, with ability to mitigate any harm or impact sustained
High Risk	Significant harm and impact to Child requiring urgent/immediate intervention

The description of risks as outlined above is not intended to be exhaustive. Risks that do not fall within these categories may be identified during the process of verification and assessment.

## 6.6 Child Safeguarding Incident Reporting Form

Your information			
Name			
Contact number			
Email			
Name of organisation (if not AFC)		Your role	

Personal information of the Child					
Name				Date of birth	
Gender	Male	Female	Non-binary	Another description (please state)	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Contact information – parent/carer	
Name(s)	
Address	
Contact number(s)	
Email	

Incident details*			
Date and time of incident			
Please tick one:	<input type="checkbox"/> I am reporting my own concerns	<input type="checkbox"/> I am responding to concerns raised by someone else – please fill in their details:	
Name of person raising concern		Role within football or relationship to the child	
Contact number(s)			
Email			
Details of the incident or concerns (include other relevant information, such as description of any injuries and/or disclosure made by a child)			

\* Attach a separate sheet if more space is required (e.g. multiple witnesses)

Child's account of the incident (if disclosed by the child to you)			
Please provide the names of any witness to the incident			
Name of witness (please indicate if a child)		Role within football (Coach, Official, Player)	
Contact number(s)			
Email			
Details of any person involved in this incident or alleged to have caused the incident/injury			

Name		Role within football (Coach, Official, Player)	
Contact number(s)			
Email			
Please provide details of any action taken to date (Contacted AFC, removal of persons involved in incident, police contacted *See next section)			
Has the incident been reported to any external agencies?		<input type="checkbox"/>	No
		<input type="checkbox"/>	Yes – please provide further details:
Name of organisation/agency			
Contact person			
Contact number(s)			
Email			
Agreed action or advice given			

Declaration	
Your signature	
Print name	
Date	

Contact your Safeguarding Officer in line with the AFC's reporting procedures	
Safeguarding Officer's name	
Date reported	

## 6.7 Responding to a Child's Disclosure of Abuse

The AFC recognises that Children may disclose their experiences of Child Abuse to Employees and Representatives. Employees and Representatives shall observe the following guidance notes when handling such matters. It should be noted that Employees and Representatives should, if the circumstances allow, contact the AFC Child Safeguarding team before initiating any conversations, but it is acknowledged that the Child's interests must come first and a conversation should not be rejected.

## LISTEN

Move to a suitable environment free of distractions.  
 Be calm and patient – allow the Child to be heard.  
 Let the Child use their own words – avoid asking questions.  
 Avoid ‘quizzing’ the Child about details of the abuse.  
 Don’t be afraid of saying the ‘wrong’ thing. Listening supportively is more important than what you say.

## REASSURE

Reassure the Child that it is OK they have told you what has been happening.  
 Address any concerns about the Child’s safety.  
 Reassure the Child that he or she is *not* at fault, and *not* the cause of any distress you may feel.

## RESPECT

Respect that the Child may only reveal some details.  
 Acknowledge the Child’s bravery and strength.  
 Avoid making promises you can’t keep – manage the Child’s expectations.  
 Explain to the Child that you will need to report their experience to someone else who can help.

### Do

Let the Child tell you in their own words.  
 Reassure them that ‘It is OK’ they told you.  
 Tell them ‘It is a brave thing to speak about this’.  
 Do tell the Child ‘What happened is not their fault’.

### Don’t

Don’t panic and say, ‘That didn’t happen’ or ‘I doubt that is true’.  
 Don’t ‘quiz’ the Child about the details of abuse.  
 Don’t make promises you can’t keep (e.g., ‘You don’t have to go home’).

Employees should take notes either during the conversation (if over the phone) or immediately after (if face-to-face). Document what was said ‘in the Child’s own words’. Employees and Representatives shall ensure the confidentiality of all information shared and noted when responding to any disclosure of abuse.



## 7. Recruitment Procedures

7.1 The AFC is committed to ensure that recruitment and screening practices that reduce the risk of Child Abuse are observed when recruiting for Child-facing roles.

For the purposes of this Policy, the AFC defines a '*Child-facing role*' as one where a person is:

- working directly with Children on a regular basis (not incidentally or one-off); and/or
- providing assistance, programmes or services to Children on behalf of the AFC.

7.2 The AFC Human Resources Department (where appropriate, in consultation with the AFC Child Safeguarding team) will assist Heads of Departments/Units and the AFC Management when recruiting for Child-facing roles, taking into consideration the provisions of the Child Safeguarding Recruitment Guide as set out under Appendix 1.

## 8. Enforcement

This AFC Child Safeguarding Policy has been adopted on 11 January 2022 and comes into force with immediate effect.

## 9. Appendices

- 1) AFC Child Safeguarding Recruitment Guide
- 2) AFC Child Safeguarding Guidelines to Reduce and Mitigate Risk
  1. Use of Dressing Rooms and Shared Facilities
  2. Use of Social Media
  3. Use of Children's Images and/or Audio-Visual Recordings
  4. Transporting of Children
  5. Travel and Overnight Stays with Children
  6. AFC Child Safeguarding Risk Assessment Tool
- 3) Policy Guidance for AFC Member Associations and Regional Associations

## APPENDIX 1:

# AFC CHILD SAFEGUARDING RECRUITMENT GUIDE

### 1. Recruitment checklist

The implementation of robust recruitment procedures will help the AFC ensure that the best applicants are employed in Child-facing roles to reduce the risk of employment or engagement of unsuitable individuals. From advertising, through to conducting interviews and background checks on applicants, it is important that each step is considered and applied where necessary.

This checklist and guide will assist any Employee involved in the recruitment of Child-facing roles to observe and undertake certain steps in the recruitment process. It includes objectives and examples for:

- Selection criteria in job descriptions.
- Advertising with a Child-safe intent.
- Interviews including behavioural-based questions and questions about motives for wanting to work with Children.
- Pre-employment screening including police/probity checks, identity checks (including international police record checks where necessary) and qualification checks.
- Reference checks over the telephone with recent managers/supervisors.
- Probation periods and performance reviews.

*\*AFC departments shall adopt this checklist entirely and use all relevant components as referred to below alongside existing recruitment procedures.*

#### A. Selection criteria in job descriptions

Developing the job description and appropriate selection criteria for the position is a vital first step in reducing the risk of employing someone who poses a risk to Children. It will also ensure that all applicants have the specific knowledge and skills required for the position. Roles involving interaction with Children should explicitly include reference to safeguarding job descriptions. If the role is identified as Child-facing, hiring departments must clearly indicate the same in the job description to the Human Resource department.

Examples of appropriate selection criteria language may include:

- *“Must have experience working with Children”; and/or*
- *“Must be able to demonstrate an understanding of appropriate professional standards when working with Children”.*

Remember to ensure that the selection criteria provides for the safety of all Children. Your applicants should have the opportunity to indicate their understanding of, or any experience they have, in working with Children with diverse needs and/or backgrounds. For example:

- Children living with a disability
- Children from a diverse range of cultural/linguistic backgrounds

#### B. Advertising with a Child Safe intent

When recruiting, advertising provides a good opportunity to demonstrate the AFC’s commitment to Child Safeguarding in addition to deterring potential candidates who may be seeking an opportunity to harm Children. Roles involving interaction with Children should explicitly include a reference to Child Safeguarding principles and values in the advertisements.

It is imperative that the AFC promotes the safety, participation and empowerment of all Children.

A suggested statement may be:

*‘The AFC promotes the safety, wellbeing and inclusion of all Children. Applicants are encouraged to elaborate on experience they may have working with Children safely.’*

#### C. Interviews

The interview process is a critical step in selecting the right people for the AFC’s Child-facing roles and in identifying any person who may pose a risk to Children.

An open-ended style of behavioural-based questioning will give insight into the applicant’s values, attitudes and understanding of professional boundaries and accountability. Some useful questions may include:

- Tell us about why you want to work with Children?
- How would the Children you have worked with previously describe you?
- Describe a time when you had to manage a Child whose behaviour you found challenging?
- Tell us about a time when you had to comfort a distressed Child?
- What boundaries are important when working with Children?

- If you were concerned about the actions or behaviour of a co-worker towards Children, how would you respond?
- How would you involve Children in their own protection as part of our programmes?

Interview panel members should be instructed to take note of their own thoughts and feelings when interacting with the applicant. Always ask for more information if the applicant does not provide sufficient information in his or her responses. Furthermore, take notice of any warning signs (often referred to as 'red flags') such as:

- Unexplained lengthy gaps in employment history
- The applicant says they do not value or 'need' supervision
- The applicant objects or criticises the need for a code of conduct
- The applicant is evasive or inconsistent in his or her answer

#### D. Pre-employment screening

Screening applicants (including for paid and volunteer positions) is an essential tool for helping prevent people who may abuse Children from being employed by the AFC. Police/probity checks from countries the applicant has recently worked in can provide insight into any prior criminal convictions. At the very least, a self-declaration form (or national equivalent) should be signed when a reliable criminal record check is not available. This can include broader questions about whether the individual has ever been subject to a disciplinary investigation. All such checks must be completed before the individual starts working in his/her role.

Additional checks will confirm the identity of the applicant and that their application and responses have been truthful.

- Have you checked the identity of the applicant (for example, that their driver's licence/passport has the same name they have provided you)?
- Did you see a certified copy of the applicant's qualifications (if required)?

#### E. Reference checks

The AFC aims to require each applicant to provide the contact details of at least two referees as this can provide insight into the applicant's character and skills. All reference checks will be undertaken as preferred over the phone by the AFC.

Managers, particularly the most recent, are likely to provide you with the most accurate reference.

\*Where possible, referees that can provide insights into the applicant's experience working with Children should be contacted as first preference.

When speaking with referees, always seek to establish the referee's relationship with the applicant, including:

- How long the applicant and referee worked together
- The specifics of the position
- The applicant's perceived strengths and weaknesses
- Whether the referee would hire the person again, particularly in a role working with Children
- Whether they have any concerns about the applicant working with Children

Additionally, ask referees directly about any concerns they may have about the applicant working with Children. To help introduce this difficult topic, you could say you have some specific questions about Child safety because your organisation takes Child safety seriously.

Ask behaviour-based questions like:

- What did the applicant do when (for example, they had to comfort a distressed Child)?
- Do you have any concerns about the applicant's attitude towards people from culturally and/or linguistically diverse backgrounds/people with a disability?

#### F. Probation

Probation periods can help the AFC assess any new worker's performance and suitability for the job before confirming their permanent employment. The length of probation periods can vary and are usually between three (3) and six (6) months.

The AFC will consider whether the person should receive closer supervision and/or additional training throughout the probation period. A probation period can offer an opportunity to set goals with inexperienced workers and identify training, supervision and other support needs.

Induction and performance review in relation to Policy awareness is recommended at bi-annual intervals for all employees.

#### G. Contacting the AFC Child Safeguarding team for further information

The AFC Child Safeguarding team can assist you with any questions or further information if needed.

## APPENDIX 2:

# AFC Child Safeguarding Guidelines to Reduce and Mitigate Risk

The AFC is committed to ensuring that Children participating or involved in AFC programmes and activities are protected from Child Abuse. Football, like many sports, has potential areas of risk which require attention. The following are examples of risks and encouraged behavioural actions to reduce and mitigate any Unacceptable Behaviour in relation to such risks:

### 1. Use of Dressing Rooms and Shared Facilities

It is important to monitor and maintain the safety of Children when utilising certain facilities during AFC programmes and activities, including dressing rooms and shared facilities.

Children can be vulnerable to abuse in dressing rooms due to common activities of dressing/undressing, use of shower areas and toilets and because they are less supervised than at many other times (for example, whilst on the pitch).

The risk of Child-to-Child inappropriate conduct, such as Bullying or sexual harassment, may be prevalent when coaches or Employees are not supervising Children. This is especially true in dressing rooms.

To reduce the risk of misconduct or Child Abuse in dressing rooms and shared facilities it is recommended that:

- An Employee or Representative assist or supervise all operational affairs of the Child/Children involved in the AFC programme or activity.
- Where facilities are used by both adults and Children at the same time, there must be access to separate changing, showering and toilet areas.
- Under no circumstances should adults undress in front of Children in dressing rooms.
- Adults must not change or shower at the same time as Children using the same facilities.
- For mixed-gender activities, separate dressing rooms must be available for boys and girls. If only one dressing room is available, the boys and girls must use these dressing rooms alternately at different time slots.
- If a Child feels uncomfortable changing or showering in the dressing rooms, then no pressure should be placed on him/her to do so. Instead, he/she should be encouraged to do so at home/hotel or official accommodation.

- If Children living with a disability need to use facilities, make sure they are accessible, and the Child and his/her carer participate in deciding if and how they should be assisted.
- The use of mobile phones and/or photographic equipment with video recording capabilities by Employees, Representatives or any other persons including Children themselves is prohibited when Children are utilising the dressing rooms to dress or shower.
- Where no dressing room facilities are available, Children and their parents or guardians should be made aware of this prior to the game and advised to make alternative arrangements and take appropriate additional clothing.
- Parents should be excluded from entering the dressing room unless it is absolutely necessary (e.g., injured Child and/or distressed Child). In such circumstances, preferably only a parent of the same sex as the Child may enter the dressing room. At least one member of the coaching staff of the same sex as the Child involved should be present with the parent when other Children are in the dressing room, especially if a parent of the same sex as the Child is not available to accompany the Child.
- Except for Employees or Representatives that are authorised to assist the Children in dressing rooms or any facilities as required, all other Employees, Representatives and any other persons, especially those of the opposite sex, should not be in the dressing room when Children are utilising such facilities to change or shower.

## 2. Use of Social Media

Misuse of information, communication and technology can put Children at considerable risk of:

- Inappropriate access to, use or sharing of personal details (e.g. names, email addresses or phone numbers);
- Unwanted contact from adults with wrongful intent;
- Being sent offensive or otherwise inappropriate material;
- Online Bullying; and/or
- Grooming for Sexual Abuse.

All Employees and Representatives who work with Children should ensure that their social media accounts are set up as securely as possible. Each website, app or device will require a slightly different configuration to set it up correctly.

There are, however, some key principles which apply to all forms of social media:

- Employees and Representatives shall not post any inappropriate photo, image or audio/video footage of a Child whether involved in AFC programmes, or activities or otherwise.
- Never give out your password, pin or login details to any other person. These details should be kept private at all times. You should also ensure that you log out after



use and don't leave your social media accounts open on a shared device as other people (including Children) could post in your name.

- Employees and Representatives should not be 'friends' or 'connected' with junior players/officials on personal social media platforms. Private chat functions within online platforms are often unmoderated and can leave adults open to accusations of improper use.
- If you need to communicate with Children associated with AFC programmes or activities, do so through official AFC communication (i.e., an AFC email account) or an AFC-appointed personnel or by group text message; approved apps/sites and/or phone calls to parents/carers; or via a post on an AFC approved platform, on a closed club or governing body page rather than via your personal profile.
- Remember that what you post online can be easily misinterpreted. When things are typed instead of said face to face it is often difficult to know the true meaning of the words and people can easily take offence to a post that was shared without intending to upset. This is especially true when online abbreviations, hashtags or emojis are used in place of words so before you post, consider how someone else might read your post.
- Never post or share messages, images and/or audio-visual recordings which are unlawful or illegal including content that may be deemed abusive, discriminatory or sexually explicit.
- Employees and Representatives are personally responsible for content they publish on social media and must be aware that what they publish can affect their own image and the image of the AFC.
- Be sure your online postings about the AFC or its activities are accurate and not misleading. It is advisable to refer any queries to the AFC Communications team at [media@the-afc.com](mailto:media@the-afc.com)

\*Any online Grooming or inappropriate conduct towards Children via an electronic service is illegal and will be immediately reported to the AFC Child Safeguarding team and/or Legal and/or local authorities.

The use of social media shall at all times be in accordance with the AFC's Social Media Policy.

### 3. Use of Children's Images and/or Audio-Visual Recordings

The guidelines below set out the recommended best practices in order to reduce the risk of inappropriate use of Children's images and/or audio-visual recordings.

- All photographers should be authorised and easily identified with a clear identification bib/tag/lanyard or badge.
- Consider using models or illustrations for promotional/advertising purposes where appropriate.

- Unsupervised access or one-to-one photography or video sessions with Children under 18 should not be allowed. At least one AFC Employee, Representative and/or the Child's parent or legal guardian should attend any one-to-one photography or video session if requested by the AFC.
- Obtain written permission from the Child's parent/guardian prior to taking images of a Child.
- If there is a large event with many Children involved (e.g. Grassroots/Community events), seek consent with information and registration documents prior to the event. Additionally, it is recommended that event coordinators set up signage that indicates "*Photography of today's event will occur. If you do not consent to your Child's image being captured and used, please speak to the event management team via (insert location/contact details)*". This is an informed consent practice.
- For non-competition events, if an image is used, avoid naming or identifying the Child. If this is not possible, do not use both a first name and surname. This intentionally makes it harder to find a Child online if only the first name is provided.
- Avoid displaying personal information such as a Child's full name, residential address, email address or telephone numbers if images are being posted on websites or distributed in publications.
- Do not display information about hobbies, likes/dislikes, school, etc. as this information has the potential to be used as Grooming tools by online predators or other inappropriate persons.
- Photography or filming should not be permitted in changing areas, bathrooms or sleeping areas.
- Only use appropriate images of the Child relevant to football or approved activities. Ensure that the Child is suitably clothed.
- Reduce the ability for direct copying of pictures from a website to another source (i.e. disable the 'right mouse click' function).
- Clearly outline in a written contract to photographers who are engaged to take photos and who will retain the images taken, include arrangements made for negatives, digital files and proofs, and outline any restrictions for use and sale. It is important to note that certain use of camera devices and/or sharing of images are inappropriate and not permitted, including images or photos that are:
  - indecent, inappropriate or suggestive;
  - taken in changing rooms, toilets or other designated private areas;
  - for the purposes of voyeurism or in an otherwise provocative or sexual manner; and/or
  - used for commercial purposes without the consent of the subject (the person's image or likeness is used to endorse a product).
- Employees and Representatives access to photo/image gallery (including images and digital footage of Children). Protocols when accessing the AFC photo/image gallery shall include without limitation:

- Employees and Representatives must have a work-related reason for accessing the gallery;
- Photos/images of Children must not be sent to any person unless it relates to work;
- Hard copies of images should be kept in a locked area (e.g. lockable drawer or filing cabinet);
- Electronic images should be in a protected folder with restricted access;
- Images should not be stored on unencrypted portable equipment such as laptops, memory sticks or mobile phones; and
- If personal equipment is used to take/download photos and recordings of Children for work purposes, images must be deleted once the project/work is completed.

Any concerns or complaints of inappropriate image use must be raised with the AFC's Child Safeguarding team.

## 4. Transporting of Children

At certain times during AFC programmes and activities, you or an AFC Employee and/or Representative, may be required to travel to various locations with a Child. Employees are allowed to drive a Child (or group of Children) to locations under the condition that the guidelines set out below are observed at all times:

Prior to traveling:

- Ensure that the Child's parent or legal guardian has expressly consented for the Child to travel for the purposes of an AFC programme, event and/or activity requiring a vehicle.
- Ensure you hold a valid and current driving licence.
- Ensure you are not under the influence of alcohol or illicit drugs.
- Ensure you inform your manager of the intended travel, the location and when you will leave and return from your trip.

During travel:

- Whenever possible, travel in a group with another worker or more than one Child.
- Ensure all Children are seated in the back seat of the car and fitted with seat belts before leaving. A worker is not allowed to drive a Child anywhere without a fitted seat belt or with a Child in the front seat (unless all rear seats are filled).
- Ensure all Children alight the car on the sidewalk side of the road.
- Take the most direct and convenient route without any unnecessary detours (e.g. do not run errands, take the scenic route, stop unnecessarily, etc.).
- Do not detour Children to any secluded areas for any reason.

- Do not leave a Child at a destination unaccompanied by another worker/adult without prior arrangement.

Once you arrive/return:

- Always advise your manager/supervisor of your arrival/return (via call, SMS, email, etc.).

During youth events and competitions, safe use of buses and minivan vehicles should include:

- Always having a minimum of three (3) players (Children) in each vehicle.
- Whenever possible, having a team official (or responsible adult) accompany the group in each vehicle.
- Seat players (Children) in the rear of the vehicle rather than the seats directly behind the driver.

## 5. Travel and Overnight Stays with Children

Overnight stays in hotels, camps, and/or competition events are to occur only with the written authorisation from the management of the relevant AFC department. Written approval from the parents/guardians of the Child/Children involved must be obtained. This approval needs to be prior to the event and in writing. Employees and Representatives attending an overnight stay involving Children must be appropriately screened in accordance with the guidelines set out under the AFC Child Safeguarding Recruitment Guide.

Attendance by Children at formal events such as an awards event or regional conference is only permitted when a parent or legal guardian travels and attends the event with their Child or where express consent is provided by a parent or legal guardian to that effect. Practices and behaviour by all persons involved during an overnight stay must be consistent with the practices and behaviour expected during the delivery of our programmes/activities. The AFC acknowledges that Children may attend overnight stays in hotels, camps, and/or competition venues throughout the region and requires several risk management standards be in place. Standards of conduct that must be observed by all persons involved during an overnight stay include:

- providing Children with privacy when in restrooms and changing areas;
- observing appropriate dress standards when Children are present – such as no exposure to any adult nudity, showering or undressing;
- not providing Children access to areas where they can be exposed to pornographic material (for example, through movies, television, the Internet, magazines, or literature);
- not leaving Children under the supervision or protection of unauthorised persons such as hotel staff, unauthorised parties or friends;

- providing sleeping arrangements that do not compromise the safety of Children such as unsupervised sleeping arrangements or an adult sleeping in the same bed as a Child. Having adults sleep in rooms adjacent to a Child's room (or as close as possible) affords easy monitoring of Children's rooms;
- the right of Children to contact their parent/guardian, or others, if they feel unsafe, uncomfortable or distressed during the stay;
- subject to the AFC's direction regarding the use of mobile devices during AFC events and activities, not removing a Child's access to their mobile phone or ability to be contactable whilst away from their families/guardians; and
- an expectation that parents/guardians can, if they wish, make contact with the Child.

## 6. AFC Child Safeguarding Risk Assessment Tool

This risk assessment tool provides some examples of potential risks of harm that may occur during an AFC programme or activity when working or volunteering with Children. Some examples of risk and how they can be mitigated are provided in the templates below (organisational-level risk assessment and activity-by-activity risk assessment).

The examples do not cover every potential risk and this assessment should be adapted accordingly and reviewed regularly before the implementation of new programmes and activities to ensure the best possible plan has been put in place.

This assessment should be adapted to fit with the way your team works with Children.

### A. Risk assessment template (organisational level)

Terms used:

- Potential risk of harm to Children – identified risks to Children participating in football.
- Likelihood of harm happening – the likelihood of the risk occurring: Low, Medium or High.
- Required policy, activity or guideline needed in response  
– which policy, activity or guideline is required to address the risk?
- Responsibility – who is responsible for reducing the risk?

Potential risk to Children	Likelihood of harm: (low, med, high)	Required policy, procedure, guideline or activity	Who is responsible for managing this area of risk? (depending on the event)	Further action (if needed) Examples below
<b>AFC EMPLOYEES &amp; REPRESENTATIVES</b>				
Recruiting inappropriate people to work with Children	High	<ul style="list-style-type: none"> <li>• Safe Recruitment</li> <li>• Child Safeguarding training and induction</li> </ul>	Recruiting managers, Human Resources, Child Safeguarding team	Background and reference checks.
Lack of Child Safeguarding training for employees, officials, volunteers, contractors	Medium	<ul style="list-style-type: none"> <li>• Child Safeguarding training and induction</li> <li>• Child Safeguarding Policy</li> </ul>	Child Safeguarding team, Human Resources and department superiors	
Other adults who may have access to Children – e.g., security, medical	High	<ul style="list-style-type: none"> <li>• Child Safeguarding training</li> <li>• Child Safeguarding Policy</li> </ul>	Child Safeguarding team and relevant departments involved	Identify who these groups of adults are and thereafter assess the risks and develop any necessary guidance that are context specific. Implement steps to mitigate risks as referred to under this Policy as a first step of action.
<b>FACILITIES AND ACCOMMODATION</b>				
Unauthorised access to Children's activity areas (changing rooms, bathrooms)	High	<ul style="list-style-type: none"> <li>• Child Safeguarding Policy</li> </ul>	Child Safeguarding team, Competitions and Events team and any other departments involved in such an area	Clarify responsibilities before a match / training session. To ensure the right signages are in place and to additionally brief all Employees and/or Representatives.
Children and adults sharing the same accommodation or facilities	High	<ul style="list-style-type: none"> <li>• Child Safeguarding Policy</li> </ul>	Security and Events team	Plan ahead to create the safest possible environment, which shall include CCTV and guards on site.

TRANSPORT AND TRAVEL				
Transporting Children between venues/training without approval	High  Low (If it is in a bus/minivan)	<ul style="list-style-type: none"> <li>Child Safeguarding Policy</li> </ul>	Security and Events team	Plan ahead to create the safest possible environment which could include ensuring that such vehicle is a van or a bus with many people per vehicle, indirectly reducing the risk of any form of abuse and to always ensure an AFC Representative and/or Employee is present.
Unvetted drivers employed to transport Children	Medium	<ul style="list-style-type: none"> <li>Child Safeguarding Policy</li> <li>Safe recruitment</li> </ul>	Security and Events team	Plan ahead to create the safest possible environment.
Unregulated travelling and trips away	High	<ul style="list-style-type: none"> <li>Child Safeguarding Policy</li> <li>Parental consent forms</li> </ul>	Security and Events team	Extensive early planning required.  Ensure there is a checklist for trips away and ensure there are enough trained and vetted adults to supervise.  To obtain parental consent.
COMMUNICATION AND SOCIAL MEDIA				
Inappropriate use of social media and communication by under-18 players	Low	<ul style="list-style-type: none"> <li>Player's Code of Conduct (to be developed)</li> <li>Social Media guidance for under-18 players</li> </ul>	Child Safeguarding team and Grassroots department	To encourage AFC Employees/Representatives to report such matters to the AFC Child Safeguarding team if such links or pages are found online.  AFC Child Safeguarding team to conduct random checks on their social media.

Inappropriate use of social media and communication by adults with Children (under 18 years old)	Medium	<ul style="list-style-type: none"> <li>• Child Safeguarding Policy</li> <li>• Guidance of communication with Children under 18</li> </ul>	Child Safeguarding team and Communications team	<p>To encourage AFC Employees/Representatives to report such matters to the AFC Child Safeguarding team if such links or pages are found online.</p> <p>AFC Child Safeguarding team to conduct random checks on their social media.</p>
COMPLAINTS AND DISCIPLINE				
Concern about behaviour of an adult towards a Child or group of Children	High	Clear Reporting Guidelines as outlined in the Child Safeguarding Policy	Child Safeguarding team, Legal and Human Resources	<p>Report concern to Safeguarding Officer.</p> <p>Immediate action needed.</p>

B. Risk assessment template (activity level): to be completed at the start of every new project/activity

What contact will you have with Children through this work project?	What potential risks to Children can you identify?	What steps will you take to mitigate these risks?	Who is responsible for ensuring these steps are taken?	Please confirm date when the action was completed
<p>Will the contact be face to face and/or online/digital?</p> <ul style="list-style-type: none"> <li>• What activities will Children be involved in?</li> <li>• Will the Children be photographed, filmed or asked to share their stories?</li> <li>• Will parents/carers be present or are staff/volunteers acting <i>in loco-parentis</i>?</li> </ul>	<ul style="list-style-type: none"> <li>• Are there any risks inherent in these activities?</li> <li>• Who will be present?</li> <li>• Will these people be MA staff/volunteers or third parties?</li> <li>• What will the environment be like?</li> <li>• What physical or emotional issues may arise?</li> </ul>	<ul style="list-style-type: none"> <li>• What have/will you include in your safeguarding planning?</li> <li>• Who is your designated safeguarding contact for this activity?</li> <li>• What support will be available for the Children present?</li> <li>• How will concerns be managed should they arise?</li> <li>• What safeguarding information will everyone involved receive at the start of the activity?</li> </ul>		
Please confirm that this risk assessment has been copied to the AFC's Safeguarding Officer or focal point			Your name and role: _____	



## Appendix 3: Policy Guidance for AFC Member Associations and Regional Associations

*Note: This document should only be used as guidance. Member Associations and Regional Associations will have to take into account their own local laws, procedures and practices when devising policies and procedures.*

The AFC, as the governing body of football in Asia, emphasises the importance of each Member Association and Regional Association having policies, procedures and guidelines to ensure that these organisations are safe for Children. The AFC has developed this policy guidance summary to assist its Member Associations and Regional Associations in developing and implementing their Child Safeguarding policies and best practices.

Member Associations and Regional Associations are encouraged to appoint a suitable and dedicated Child Safeguarding focal point within their organisation, who should be provided with the necessary support, training and resources to facilitate Child Safeguarding initiatives, including the development of a safeguarding policy. The Child Safeguarding focal point will act as a point of reference and as a coordinator. A vital role of the Child Safeguarding focal point is to work closely with key internal and external partners to develop and implement safeguarding procedures, especially procedures for responding to suspected cases of abuse. This person will also liaise with the AFC on relevant topics.

Member Associations and Regional Associations should ensure that the following key areas are met when developing a Child Safeguarding policy:

- Strive to ensure that the policy is adhered to by its members, affiliates and stakeholders and their staff and officials;
- Advocate and promote Child rights, empowering and engaging Children in support of the policy;
- Proactively share resources and experience in the development of Child Safeguarding initiatives in football as they are identified;
- Develop opportunities for regular discussion at all levels to support a culture of continuous improvement and accountability in respect of Child protection. For example, in team meetings or regular forums, include Child Safeguarding as a regular agenda item; and
- Strive to ensure that adequate resources are allocated to allow effective implementation of the policy.

Member Associations and Regional Associations are encouraged to have in place the following:

1. A Code of Conduct (that identifies clear professional standards of conduct when working with, or in the presence of Children).

2. Clear procedures for responding to allegations of Child Abuse, which includes the implementation of local laws and internal processes.
3. Sound recruitment screening processes for Employees/volunteers who are engaged to work with Children (including criminal record checks and background/reference checks).

Your organisation's Child Safeguarding policy should:

- Demonstrate your organisation's commitment to the safety and wellbeing of Children.
- Identify to leaders, staff and volunteers the actions required and both individual and collective responsibilities to prevent harm and keep Children safe.
- Promote and protect the rights of Children.
- Clarify the roles and responsibilities in relation to recognising and responding to Child Abuse.
- Refer to relevant legislative requirements and to the organisation's other policies, procedures and guidelines for keeping Children safe.
- Be specific to the size, nature and risks of your organisation and the services /programmes it provides to Children.
- Be easy for people to access and understand.

In developing a Child Safeguarding policy or any best practices, each Member Association and Regional Association shall be solely responsible for all matters concerning the development, implementation and enforcement of their respective policies and practices.



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