



GUIDANCE NOTES NO:

1.7

APPROPRIATE BEHAVIOURS AND POSITION OF TRUST

FOR ALL

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FA REGULATIONS – POSITION OF TRUST

Under The FA's Regulations it is prohibited for an individual to engage in sexual activity or have an inappropriate relationship with children and/or young people where they are in a 'position of trust' in relation to them¹.

'Position of trust' is defined broadly and includes where that individual is in a relationship of trust with any person with responsibility and/or authority in relation to that person, including without limitation those who care for, advise, supervise, train, coach, teach, manage, tutor, instruct, mentor, assess, develop, guide, treat or provide therapy to them.

In practice, this means that where a position of trust exists then it is prohibited for an individual to engage in sexual activity or have an inappropriate relationship with young people aged 16 and 17, notwithstanding that the age of consent is 16.

Examples

It is not possible to provide an exhaustive list of the types of roles in football that may be held to be in a position of trust and each case will be fact-specific.

That said, potential examples could include managers, coaches, referee coaches, referee developers (in each case including assistants) and other roles.

An adult does not need to hold a particular qualification or licence to be in a position of trust and they can, for example, be an employee or volunteer.

The above regulatory requirements have been in place for several years, and since August 2022 it has also been a criminal offence for an adult to engage in sexual activity with a 16- or 17-year-old where they are in a "position of trust" to them in the context of sport.

This change in the law follows multiple examples of abuse in sport that have come to light in recent years, including in football. Adults must always maintain clear and appropriate boundaries, be supportive, positive and focussed on improving a young person's skills, development and progress.

You can find more information on preventing abuse in positions of trust [here](#).

¹ FA Regulations also prohibit individuals who are in a position of trust from engaging in sexual activity or having inappropriate relationships with adults at risk, however the scope of this guidance document is limited to children and young people.



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Online (digital) activity

The position of trust can arise in the context of both online (digital) and face-to-face activity. Working online brings additional vulnerabilities and risks for young people. Being mindful of those risks, selecting appropriate platforms and following applicable codes of conduct and digital guidance is essential. Guidance on safeguards in the digital world is available [here](#).

If you are in a position of trust then you should only text or engage online with a young person as part of a recognised group for specific, legitimate football purposes and only utilise platforms where there is a permanent record of the communication, so it is open to scrutiny and is recoverable.

This is opposed to those where the content and images disappear on the social media platform.

It is also your responsibility to be mindful that a young person may seek to add you as a 'friend' to their online social media contact list. If this happens, it is recommended that you:

- I. politely decline the invitation and explain that this would not be appropriate; and
- II. make a written report of this to your organisation's designated safeguarding person / club welfare officer.

What should I do?

If you are in a position of trust, then you should:

- ✓ Maintain a positive, professional, healthy relationship with the young people under your care that is supportive, positive and aimed at improving the young person's skills and progress.
- ✓ Maintain a relationship with all participants that is appropriate to your role and reflects positively on the club or organisation you work or volunteer for.
- ✓ Ensure you read, understand, sign up to and comply with the relevant codes of conduct e.g., [The Grassroots Code](#).
- ✓ Never engage or seek to engage in sexual activity or sexualised communication or image sharing (including via social media) with any young person. This includes 16- and 17-year-olds for whom you are responsible.
- ✓ Make your Club Welfare Officer, County FA Designated Safeguarding Officer, or Safeguarding Lead aware if you think that a young person's behaviour indicates they are seeking to develop or



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engage in an inappropriate relationship with you. Be careful not to respond to the young person in any way that could be interpreted as encouraging them. Make a written record of your concerns and relevant details.

Dealing with a possible abuse of trust

If you suspect that an abuse of a position of trust has occurred, is occurring or may occur, you must:

- ✓ immediately inform your Club Welfare Officer, County FA Designated Safeguarding Officer or contact Safeguarding@TheFA.com;
- ✓ report the matter directly to the Police; and
- ✓ make a written record of your concerns and relevant details.

If you are unable to contact the Club Welfare Officer, County FA Designated Safeguarding Officer, or The FA Safeguarding Case Team, or if you think someone is at risk of immediate harm, you must report it to

Children's Social Care.

If you think your concern has not been dealt with appropriately, or there is no safeguarding officer, you can consult with your local authority's Children's Social Care Designated Officer whose duties include responding to concerns about potential breaches of a Position of Trust. To find the contact details, please search on your local authority's website or go to www.advicelocal.uk.





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