



MANCHESTER CITY



MANCHESTER CITY FOOTBALL CLUB

STAGE TWO

REVIEW OF CONTEMPORARY SAFEGUARDING ARRANGEMENTS

1. INTRODUCTION

1.1 In November 2016, Manchester City FC (**MCFC**) and City Football Group (**CFG**) commissioned an exhaustive review into allegations of non-recent Child Sexual Abuse connected to the Club. The work was split into two stages:

1.1.1 Stage One - the review of non-recent events dealt with in the Mulcahy Report; and

1.1.2 Stage Two - a review of the current safeguarding arrangements across MCFC-related operations to assess their suitability as well as making recommendations for enhancing provision and minimising risk where necessary.

Stage Two is dealt with in this document.

1.2 To perform Stage Two, MCFC commissioned LimeCulture, who are experts in safeguarding and responses to sexual violence (and had also assisted with the matters dealt with in the Mulcahy Report). Their review of current practices is referred to below as the **LimeCulture Review**.

1.3 This document firstly presents a summary of the LimeCulture Review findings, and secondly reports on other significant internal and external processes that provide an assessment and overview of the current safeguarding arrangements at MCFC.

2. THE LIMECULTURE REVIEW - FINDINGS AND RECOMMENDATIONS

2.1 The LimeCulture Review included assessment of MCFC, Manchester City Women's FC, and City In The Community (CITC) and their related operations. It was completed during 2018 and LimeCulture provided a confidential report with findings and recommendations.

2.2 The agreed aims of Stage Two were threefold:

- (a) identify and describe strengths in current practice and provision;
- (b) identify and describe areas for improvement including reasons; and
- (c) make key recommendations for change.

2.3 The LimeCulture Review included both desk-based research methodology alongside an extensive programme of semi-structured interviews with relevant individuals - members of the workforce from across the business including senior managers, organisational leaders and those with operational responsibility. The Review team also met with players and parents involved in MCFC-related activity.

2.4 An outline of the findings related to the 'strengths in current practice and provision' from the LimeCulture Review is presented below:

2.4.1 There is a strong awareness of safeguarding across all areas of the business of the Club and a strong foundation upon which to build. Senior managers are committed to developing a safeguarding model that incorporates all areas of the business and that will embrace the growth of that business in the years to come;

2.4.2 Almost all staff that the LimeCulture team spoke to were aware of the 'SafeAtCity' safeguarding policy. This policy is highly visible to staff, visitors, and players. In addition, safeguarding personnel in the organisation are also highly visible;

2.4.3 There are significant areas of good practice which can be developed and improved to ensure that safeguarding is embedded by all staff in their day to day roles;

2.4.4 There is a strong emphasis on the importance of training in the Club. In recent years, generic safeguarding training has been extended to all staff and this has clearly raised their awareness of safeguarding; and

2.4.5 Both young players and their parents spoke highly about the Club and their approach to keeping people safe.

2.5 An outline of the findings related to 'areas for improvement' and risk management from the LimeCulture Review is presented below.

2.5.1 The organisational response to safeguarding across MCFC and the wider CFG has developed in a piecemeal fashion over several years.

2.5.2 Staff acknowledged that for the most part, and until recently, safeguarding was seen as someone's 'job' rather than an intrinsic part of the day to day delivery of all aspects of the CFG's business.

2.5.3 Staff questioned how they might become more knowledgeable around their role in safeguarding and told the review that they would benefit from more direction or training.

2.5.4 Many staff at every level and in every area of business told the review that they did not feel sufficiently knowledgeable to discharge their safeguarding responsibilities, explaining that

the in-house course they had attended had given them an insight – but not the tools to do the job.

- 2.5.5 Senior managers told the review that in their opinion few of them fully understood safeguarding or how it should be implemented across the business. Some admitted that for them, safeguarding was an ‘after thought’ and they did not yet consider it to be at the core of their work.
- 2.6 The above findings were presented alongside a series of recommendations – 81 in total. The recommendations covered both strategic and operational enhancements.
- 2.7 Many of the recommendations applied across the Club operations, though some related to specific programmes or departments (such as academy programmes or CITC) and have been summarised below:
- (a) development of overall shared organisational values for CFG;
 - (b) development of a Group-wide safeguarding strategy and increase levels of expertise on the Board of Directors;
 - (c) review CFG senior management meeting structure to allow for regular review, monitoring and auditing of safeguarding practice;
 - (d) review the structure, oversight of, and support to, the safeguarding team to meet the current and future needs of the business;
 - (e) stronger emphasis on and improvements to safeguarding training across the business, delivered through a more sophisticated operational model, to include more contextualised training, including, amongst others:
 - (i) board and senior management;
 - (ii) tour leaders and residential workers;
 - (iii) reporting concerns;
 - (iv) risk assessment; and
 - (v) relevant training to participants/players.
 - (f) improve the visibility, accessibility, compliance with, and understanding of safeguarding-related policy documentation to all workers;
 - (g) improvements to the handling of concerns and multi-disciplinary working across the business;
 - (h) improvements to how safeguarding practice is embedded into commercial partnership working and the development of a consistent approach to this including ‘due diligence’ and contracting processes;
 - (i) enhancements to systems for engaging with and listening to children, other vulnerable participants, and their parents / guardians;
 - (j) conduct reviews of operational working practice in a number of areas and the development of related policy and protocol; and

- (k) conduct a review of match day safeguarding-related operations to ensure that the relevant needs are met.

3. MCFC RESPONSE TO THE “LIME CULTURE REVIEW”

- 3.1 The LimeCulture Review report was finalised and presented to the Club in January 2019. The report was then presented in person by LimeCulture representatives to the CFG Executive Leadership Team and the details of the review shared with, and the recommendations adopted by, the CFG Board of Directors.
- 3.2 As a result of the LimeCulture Review, an interim strategic plan was developed in the spring of 2019 to create a roadmap for implementation of the recommendations. The plan, approved by senior managers, then quickly increased the strategic and operational capacity of the CFG safeguarding team, with particular focus on MCFC/UK operations. This represented a significant financial commitment from the CFG Board of Directors to the ongoing development of the safeguarding team and associated framework.
- 3.3 As at December 2020, many of the LimeCulture Review’s recommendations have been implemented. Some of these enhancements and developments were already in place ahead of the publication of the report, others have been gradually implemented into existing structures and both MCFC and CFG have continued to review the resourcing to the safeguarding programme to ensure that, where appropriate, the outstanding recommendations are implemented.
- 3.4 A new CFG Safeguarding Strategy was approved by the CFG Board of Directors in November 2020¹. This document presents the strategic objectives and priorities for the safeguarding programme for the next three years across all CFG controlled entities, including all MCFC operations.

4. CURRENT SAFEGUARDING ARRANGEMENTS AND SCRUTINY

- 4.1 Current safeguarding practice at MCFC is subject to ongoing internal and external scrutiny and as such the safeguarding programme exists in a constant cycle of continuous improvement. Modifications are regularly required due to changes to legal or regulatory requirements both in the general safeguarding landscape and within the sport/football sector.
- 4.2 The MCFC safeguarding department provides quarterly updates to the Group General Counsel, who fulfils the role of ‘Senior Safeguarding Lead’ which is a regulatory requirement within Premier League rules. The Group General Counsel is an officer of both the CFG and MCFC Boards of Directors in his capacity as Company Secretary and sits on the Group Executive Leadership Team. He is the champion for safeguarding-related matters, sharing quarterly reporting and the Annual Safeguarding Review with the Executive Leadership Team, CFG Audit Committee and CFG Board of Directors.
- 4.3 The MCFC safeguarding team has commissioned several independent safeguarding experts, suitably qualified and experienced in their fields, to provide both independent scrutiny and support to policy, protocol and related operational practice.
 - 4.3.1 During season 17/18, MCFC commissioned an independent advocacy service to conduct visits to all children living away from home for the purposes of taking part in academy football at the Club. Under the service terms, every child receives regular well-being visits throughout the season from an independent children’s advocate. The service provider submits termly

¹ Strategic plans for safeguarding have previously been presented to leadership in 2011, 2014 and 2017

reports to MCFC reporting on the visits and any themes or improvements that can be made to the residential programme that arise from the conversations with young players. Should the service find that standards or practice are significantly concerning they are obliged to make referrals to statutory agencies.

- 4.3.2 MCFC regularly engages several independent advisors to work with the safeguarding team in a number of significant areas:
- (a) regular scrutiny and support to the Concern Management protocols;
 - (b) a panel of independent investigators to provide support to safeguarding concerns which do not meet criminal thresholds and require internal handling; and
 - (c) an independent advisor to provide 'safeguarding supervision' to all MCFC (and CFG) safeguarding practitioners, including the Senior Safeguarding Lead and Group Director of Safeguarding.

5. PREMIER LEAGUE MONITORING

- 5.1 The Premier League performs its own safeguarding assessments at each club once a year. Over the last ten years of external assessment by the Premier League, MCFC have met all the required standards, and in all seasons were considered to have operated well above the required minimum standards.
- 5.2 The Premier League enhanced its monitoring of safeguarding-related compliance in 2018 through the commissioning of Barnardo's Training and Consultancy, which now conducts independent audits of club safeguarding arrangements. As such, both the Club and CITC are audited each season. Whilst the audits take place as separate entities, they are assessed against similar standards. The format of these audits follow a similar pattern to the OFSTED audits conducted on schools in the United Kingdom and take place over four or five days, though being annual, they are more frequent than in the education sector. In respect of such audits:
- 5.2.1 Both MCFC and CITC has consistently achieved very positive results and meet all the required standards;
 - 5.2.2 The Barnardo's report from season 2018/19 states that *"Manchester City Football Club meets all of the Standards, most to a very high degree. There is evidence of a culture, which acknowledges that safeguarding is everyone's responsibility. Governance and leadership is good and the commitment to providing a safe environment for everyone permeates through the Club and the Academy"*;
 - 5.2.3 The 2019/20 report states that MCFC achieves the same standards, again *"most to a very high level"*; and
 - 5.2.4 The CITC report for 19/20 states *"leadership and governance in CITC is good and there is evidence that safeguarding is well embedded in the organisational culture. The SGO has a particularly high profile across the organisation and she is clearly held in high regard."* The report also states that CITC *"met all the Standards most to a very high level"*. The previous report from 18/19 also stated that CITC *"meets all of the standards, most to a very high degree"*.

6. LEARNING LESSONS

- 6.1 MCFC and CFG are committed to promoting and protecting the rights and well being of children and Adults at Risk and as such substantial resource and effort is afforded to the implementation of the safeguarding strategy.

- 6.2 MCFC and CFG are committed to the ongoing improvement of organisation-wide safeguarding arrangements. The Mulcahy Report, the LimeCulture Review and annual auditing processes have provided many and varied lessons to learn from and shape current and future arrangements. The current safeguarding strategy recognises that harm to children and Adults at Risk resulting from abuse, harassment or neglect can happen in all walks of life and that sports settings can pose substantial risks to participants. As such, CFG and MCFC will continue to review and enhance its safeguarding arrangements accordingly.