



Coach and Scout Verification Policy

What verification requires, what it proves, and what it does not.

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POLICY OWNER	Charles Heffron, Director and Designated Safeguarding Lead
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8.1 Purpose

Adults on the Platform can search for young athletes, and scout search allows them to be filtered, including by location. They can also approach users directly. Identity verification is the gate we place in front of both.

This Policy sets out when verification is required, how it works, what it establishes, and — importantly — what it does not establish. We state the limits plainly, because a verification system that is misunderstood is more dangerous than one that is understood to be narrow.

8.2 When Verification Is Required

Verification is not required to create an account, build a profile, or publish content. It is required before an account registered as a coach, scout, club, academy or team can:

- **start a new conversation** with any user on the Platform;
- use **scout search** — the filtered search of athletes, including searching by location, level, sport or position; or
- display a **verified badge** on their profile.

Ordinary search of the Platform does not require verification. What verification gates is the ability to identify and filter young athletes at scale, and the ability to open a conversation with someone — the two capabilities that carry the greater risk.

Verification is a control on contact, and it is not the only one

An unverified coach, scout or team account cannot approach a young athlete by any route. That is the first control. It is not the last: **no adult, verified or not, can hold a conversation with a young athlete who has not connected with them.** Any message from an unconnected user goes to a request inbox and does not become a conversation unless the young person accepts it. Verification decides who may knock; the young person decides whether the door opens. Both controls, and the two that sit alongside them, are set out in the Adult-to-Minor Contact Policy.

What declining verification means

IF YOU HOLD	EFFECT OF DECLINING
An athlete account	No effect. Verification is entirely optional for athletes and no feature available to an athlete depends on it. You can build a full profile, be discovered, post content, join and manage teams, and use messaging as normal. The only thing you do not get is a verified badge.
A coach, scout, club, academy or team account	You cannot start a new conversation with any user, and you cannot use scout search. Other features of the Platform remain available to you. The restriction is lifted as soon as verification is completed.

Users under 18

Verification is never required of a user under 18, and no feature available to a young athlete depends on it. A user aged 13–17 may choose to complete verification if they wish, and may decline without any effect on their account.

Where a young person does verify, the limits, consent position and retention described in this Policy apply in the same way.

8.3 How Verification Works

Verification is carried out by our specialist provider, Persona Identities, Inc. The user submits an image of a government-issued identity document and a live selfie. Persona uses biometric facial comparison to confirm that the person presenting the document is the person the document describes, and performs automated checks for document fraud.

Persona holds the document images, the selfie and the derived biometric data. We never receive or hold them. We receive only the outcome — approved or declined — and the limited metadata needed to attach that outcome to the account. Persona retains and deletes the data it holds in accordance with its own retention schedule, under a data processing agreement with us.

What we keep

We keep the outcome and the date it was recorded. We hold that for as long as the account exists and for six years afterwards, so that we are able to answer a later safeguarding enquiry about who was verified and when. Full detail is in our Privacy Policy and our Retention Schedule.

The lawful basis for processing biometric data

Biometric data used to identify someone is special category data under the UK GDPR, and requires a condition under Article 9 as well as a lawful basis under Article 6.

We rely on your explicit consent under Article 9(2)(a), which you give when you begin verification and which you may decline or withdraw. Where explicit consent cannot be relied upon, we rely on Article 9(2)(g) — processing necessary for reasons of substantial public interest — with the condition at paragraph 18 of Part 2 of Schedule 1 to the Data Protection Act 2018, which covers the safeguarding of children and of individuals at risk. Our Appropriate Policy Document, which that condition requires us to hold, is kept internally and produced to the Information Commissioner on request.

8.4 What Verification Establishes — and What It Does Not

QUESTION	ANSWER
Is this person who they say they are?	Yes. Their identity matched a government-issued document at the time of verification.
Is this a real person rather than a fabricated account?	Yes.
Is this person over 18?	Yes, where the document confirms it.

Does verification let them see a private profile?

No. Verification confers no additional visibility whatsoever. A private account is invisible to a verified coach or scout exactly as it is to any other non-connection — it cannot be seen, found in search, or opened by a link. Every account held by a 13–17 year old is private unless that young person has chosen otherwise. There is no badge, setting or account type that sees past a user's privacy choice.

Do they hold the coaching qualifications they claim?

No. We do not check qualifications, certifications or licences.

Do they actually work for the club or institution on their profile?

No. We do not verify employment, affiliation or authority to represent an organisation.

Do they have a criminal record?

No. We do not carry out DBS checks, barred-list checks, or any criminal record check.

Are they safe to work with or contact children?

No. Verification is not a suitability assessment and must never be treated as one.

In one line: verification tells you who someone is. It does not tell you whether they are trustworthy, qualified, or safe, and it does not give anyone access to anything a user has chosen to keep private. A verified badge is an identity statement, not an endorsement.

8.5 Why We Still Require It

Verification does not prevent a determined offender from creating an account. What it does is remove anonymity from anyone who wants to approach a young athlete, which matters for three reasons:

- **Accountability.** A person who uses scout search to seek out young athletes, or who opens a conversation with one, has confirmed their real identity to a third-party provider. If a referral is made to the police, there is a real identity behind the account.
- **Deterrence.** Anonymity is a precondition for much online offending. Requiring identity before contact removes the low-effort route.
- **Re-registration is harder.** A terminated account cannot simply be replaced with a fresh anonymous one able to resume scout searching or approaching young athletes.

Verification is one control among several. It works alongside the private-by-default position for under-18 accounts, the request inbox, the automated screening of contact requests, reporting, proactive review, and the referral procedure. No single control is relied upon on its own.

8.6 Representations Users Must Not Make

Users must not represent a verified badge as implying endorsement, qualification, vetting, or any assessment of suitability to work with or contact children. Doing so is a breach of our Terms and Conditions and may result in removal of the badge or termination of the account.

Users must also not represent verification as conferring access to another user's private profile or private fields. It does not.

Where we become aware that a user is presenting verification as a safeguarding credential — to an athlete, a parent, a club or a school — we will act on it.

8.7 Failure, Human Review and Revocation

- **A failed automated check is not final.** A user may retry verification, and may contact us at main@thesportingnetwork.com to request human review of the outcome. No verification decision is left to an automated process alone where the user asks us to look at it.
- **Declining verification is permitted** and carries no consequence beyond the loss of access to the features listed in section 8.2.
- We may remove a verified badge, decline verification, or require re-verification at our reasonable discretion, including where we suspect fraud, misuse, account sharing, or where a safeguarding concern has been raised.
- Where an account is terminated on safeguarding grounds, its verification status is revoked and the outcome record is preserved in accordance with the Safeguarding Referral and Escalation Procedure.

8.8 Known Limits and Position on Further Checks

We record here, openly, the principal limitation of our current approach: **an adult who passes identity verification has not been vetted**. Nothing in our process would identify a person with a relevant criminal history or a record of concern held by a governing body.

We are not in a position to carry out criminal record checks. Under UK law, DBS checks are available only for eligible activity and are ordinarily obtained by an employer or a body responsible for the activity — not by a platform on which people register independently. We do not claim an ability we do not have.

A second limitation follows from the first. Verification confirms an identity; it does not confirm an age beyond what the document shows, and it is not applied at registration. A user who registers with a false date of birth is not caught by this Policy, because verification is not the mechanism that determines whether an account is treated as a child's account.

What follows from that:

- Our documentation states the limits plainly rather than implying broader assurance.
- We rely on the contact controls in the Adult-to-Minor Contact Policy — visibility, acceptance and screening — to limit what an unvetted but verified adult can actually do.
- Where we partner with a school, club or governing body, safeguarding checks on their staff remain their responsibility and are carried out under their procedures, not ours.

We keep under review whether further assurance can be introduced — including integration with governing body safeguarding registers, or requiring evidence of an existing check for users acting in a professional coaching capacity. Any such change will be recorded here.

8.9 Review

This Policy is reviewed annually, and immediately following any incident in which a verified account was involved in a safeguarding concern. Where verification requirements change, this Policy, the Privacy Policy, the Adult-to-Minor Contact Policy and the Terms and Conditions must all be updated together before the change goes live.

Version history

VERSION	DATE	CHANGE
1.0	August 2026	First issue. Not published.
1.1	26 August 2026	First published version. Section 8.2 corrected — verification gates the starting of any new conversation as well as scout search and the verified badge — with the effect of declining now stated separately for athlete accounts and for coach, scout and team accounts, and a new statement of the position for users under 18. Section 8.3 gains what the company itself retains and for how long, and states the Article 9 conditions relied upon for biometric data. Section 8.4 gains a row recording that verification confers no additional visibility and does not see past a privacy setting. Sections 8.1, 8.5, 8.6, 8.7 and 8.8 updated consequentially.

The Sporting Network Ltd · Company number 16989082 · Registered office: 14 Hollywell Row, London, EC2A 4JB · DSL: Charles Heffron · main@thesportingnetwork.com

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