

Safeguarding Adults At Risk Policy & Procedures

Policy Name: Safeguarding Adults At Risk Policy
and Procedures

Effective Date: June 2021

Next Review Date: June 2023

Drafted by: Head of Skills and Safeguarding

Approved by Board:



**COMMUNITY SPORTS
& EDUCATION
TRUST**

REGISTERED CHARITY NO: 1102239

Contents

1	Statement <i>p.1</i>	18	Creating a Safe Environment <i>p.15</i>
2	Principles <i>p.1</i>	19	Facilities Hiring & Third Party Working <i>p.16</i>
3	Scope <i>p.2</i>	20	Good Practice <i>p.17</i>
4	Safeguarding, Governance & Leadership <i>p.3</i>	21	Signs, Indicators & Forms of Poor Practice & Abuse <i>p.18</i>
5	Definitions <i>p.4</i>	22	Poor Practice & Abuse <i>p.19</i>
6	Aims & Key Principles <i>p.4</i>	23	What To Do If You Receive a Safeguarding Disclosure From An Adult At Risk <i>p.20</i>
7	Watford FC Community Sports & Education Trust – Positive Culture <i>p.5</i>	24	Information for the Local Safeguarding Adults at Risk Services or the Police About Alleged Abuse <i>p.21</i>
8	Head of Skills & Safeguarding <i>p.6</i>	25	Safeguarding Allegations Against Staff <i>p.23</i>
9	Designated Safeguarding Officers <i>p.7</i>	26	PREVENT <i>p.24</i>
10	Mental Capacity <i>p.8</i>	27	Historic/Non-Recent Concerns of Abuse <i>p.25</i>
11	The Statutory Principles <i>p.9</i>	28	Peer On Peer <i>p.26</i>
12	Procedures For Gaining Consent <i>p.9</i>	29	County Lines <i>p.26</i>
13	Information Sharing <i>p.10</i>	30	Use of Photography & Videos <i>p.27</i>
14	Safer Recruitment & Disclosure <i>p.10</i>	31	E-Safety <i>p.28</i>
15	Employee & Worker Training <i>p.12</i>	32	Social Networking Guidance <i>p.28</i>
16	Responsibility of Safeguarding Adults At Risk <i>p.13</i>	33	Confidentiality <i>p.29</i>
17	Protecting Adults At Risk With Disabilities <i>p.14</i>		Appendices <i>p.31</i>

1

Statement

Watford FC Community Sports and Education Trust (hereafter referred to as the Trust) is committed to creating opportunities for adults at risk to participate in a broad spectrum of activities at the Trust at the same time as creating a safer culture for the participants.

The Trust has a moral, legal, and social responsibility to provide a fun and safe environment for all those participating in these activities. Working in partnership with adults at risk and their support network is essential in promoting and embedding this Policy.

2

Principles

The Trust seeks to ensure the safety and well-being of all adults at risk who engage in activities with the Trust. It is through the application of this policy and procedures that the Trust will seek to develop a positive and proactive welfare program to enable all adults at risk to participate in an enjoyable and safe environment. This equally applies to the safety and security of those working with and responsible for the activities involving adults at risk.

If you work or intend to work with adults at risk, you are automatically placed in a position of trust that carries authority, status, power, and responsibility. If the staff involved are positive role models, displaying high moral and ethical standards; the benefits to an adult at risk's development can be significant. Football can and does have a positive effect on an adult at risk's development; and is potentially an inspiration for all sections of our community.

3

Scope

This policy is for use across the Trust and is to be observed by all those working with adults at risk. The application of this policy and procedures across the Trust, promoting safeguarding good practice is mandatory.

All the requirements of this policy are obligatory and are to be enforced where there are any suspected instances of poor practice or abuse. All employees, workers, consultants, agency staff and volunteers must make themselves aware of the Trust's Safeguarding Adults At Risk Policy and Procedures. Where appropriate to their role with adults at risk they will be supported by a safeguarding training program.

The person with responsibility for safeguarding at the Trust is the Head of Skills and Safeguarding (HoSS). The Trust fully acknowledges and accepts its responsibility for the safety and well-being of individuals who engage in any activity carried out with the Trust.

The Trust has an inclusive approach and welfare is of paramount importance. It is the duty of all staff working at the Trust to safeguard the welfare of adults at risk by creating an environment that protects them from harm.

Activities undertaken at the following locations and departments are under the remit of this policy, including:

- Watford FC Community Sports and Education Trust (the Trust)
- Watford Women FC
- Meriden Community Centre, Watford
- Cedars Youth and Community Centre, Harrow Weald

The Trust has comprehensive safeguarding procedures in place to meet the requirements of The FA and Premier League Rules (Section S, the 'Safeguarding of Vulnerable Groups 2006'); The Care Act 2014. These procedures ensure that national standards for safeguarding are met and implemented throughout the Trust.

In respect of safeguarding individuals from radicalisation, the Trust works to the PREVENT element of the Government's Counter Terrorism Strategy, and where deemed appropriate seeks external support for adults at risk through referrals to the Channel Program. This program aims to work with the individual to address their specific vulnerabilities, prevent them from becoming further radicalised and possibly entering the criminal justice system because of their actions. It is recognised that radicalisation can occur to an individual from any section of society and is not particular to any racial, ethnic, or social group. It is further recognised that in many instances the process of radicalisation is essentially one of grooming by others.

The Trust also has a responsibility to maintain regular dialogue with Local Safeguarding Adults Boards. The Trust will refer concerns that an adult at risk might be at risk of significant harm to the Adult Services, the Police or in cases of suspected radicalisation to the Channel Scheme as appropriate. The Trust will refer to the Local Authority Designated Officer (LADO) any incident or allegation against a person in position of trust.

4

Safeguarding Governance & Leadership

The Trust has a safeguarding team that provides clear direction and addresses all aspects of safeguarding at a strategic and operational level. The Trust has a Board Lead who oversees the delivery of the safeguarding strategic plan through the safeguarding board.

The operational delivery of safeguarding is coordinated by the Head of Skills and Safeguarding (HoSS) and is supported by Designated Safeguarding Officers (DSO). Each officer is specifically responsible for providing localised expertise and support the promotion and awareness-raising of safeguarding.

All safeguarding concerns and issues relating to children, young people, and adults at risk should be reported via the Designated Safeguarding Officer for the respective location and to the Head of Skills and Safeguarding. All safeguarding concerns must be reported within 24hrs following the identification of a concern via the Trust's CPOMS system.

5

Definition of an Adult At Risk

Anyone who is aged 18 years old or above.

Has care and support needs (regardless of whether they receive formal support or not).

Is at risk of, or exposed to, harm (abuse and exploitation)

Who (because of their care and support needs) is unable to protect themselves.

6

Aims & Key Principles

The aims of the Trust's Safeguarding Adults at risk Policy and Procedures are to:

- Safeguard all adults at risk who interact with the Trust and its' employees and volunteers.
- Demonstrate best practice in safeguarding adults at risk.
- Develop a positive and proactive welfare program to enable all adults at risk to participate in an enjoyable and safe environment.
- Promote high ethical standards throughout.

The Key Principles Underpinning this Policy are:

- The individual's welfare is and must always be the paramount consideration.
- All adults at risk have a right to be protected from abuse regardless of their gender, race, disability, sexual orientation, religion or belief or age.
- All suspicions and allegations of poor practice or abuse will be taken seriously and responded to efficiently and appropriately.
- Ensuring that staff, coaches, and other staff who meet adults at risk are good role models.
- Working in partnership with other organisations, adults at risk, and their person responsible is essential.

7

Watford FC Community Sports & Education Trust – Positive Culture

All employees, workers, consultants, agency staff and volunteers working with adults at risk should adhere to the following principles and action:

- Always work in an open environment (e.g., avoiding private or unobserved situations and encouraging open communication with no secrets).
- Adhere to the Lone Working Policy and risk assessment.
- Make the experience of the provided activity fun and enjoyable.
- Promote fairness, confront, and deal with bullying.
- Treat all individuals equally and with respect and dignity.
- Always put the welfare of the adult at risk first.
- Maintain a safe and appropriate distance from the adult at risk and avoid unnecessary physical contact.
- Where any form of manual/physical support is required it should be provided openly and with the consent of the adult at risk.
- Physical contact can be appropriate so long as it is neither intrusive nor disturbing and the adult at risk has given consent.
- If groups have to be supervised in changing rooms always ensure coaches e.g., work in pairs.
- Request written consent if Trust officials are required to transport adults at risk.
- Gain written consent for any significant travel arrangements e.g., overnight stays.
- Staff are qualified and a qualified first aider is in attendance.
- Ensure that at away events adults should not enter an adult at risk's room, or invite adults at risk to their rooms.
- Be a good role model, this includes not smoking or drinking alcohol in the company of adults at risk.
- Always give enthusiastic and constructive feedback rather than negative criticism.
- Secure written parental consent for the Trust to act in 'loco parentis', to give permission for the administration of emergency first aid or other medical treatment if needed.
- Keep a written record of any injury that occurs, and details of any treatment given using the Trust's Child Protection Online Management System (CPOMS).
- Adopt all other good practice/common sense principles given the varying situations.
- Challenging poor practice such as racism, sexism, homophobia, bullying, foul, aggressive or provocative language or any controlling behaviour that upsets adults at risk is vital.
- Never ignore bullying or verbal abuse by supporters, parents, coaches, or adults at risk.
- Listen to and support the person being targeted. Explain to the bully that poor behaviour is unacceptable.
- Refer to the Trust's Anti-Bullying Policy where appropriate.

8

Head of Skills & Safeguarding (HoSS)

The role of the Trust's Head of Skills and Safeguarding is to:

- Work closely with Board of Trustee's Safeguarding Lead to provide clarity across the Trust to ensure full compliance with Premier League/English Football League rules, the FA safeguarding agenda and Government legislation.
- Maintain key relationships with Trust's Board of Trustees, Parent Club's Head of Safeguarding, the Premier League Safeguarding Team, Designated Safeguarding Officers, NSPCC, Police, Children's Services, Local Safeguarding Adults At Risk Board, Local Authority Designated Officer (LADO) (for the management of allegations against professionals), and The FA Safeguarding and Case Management teams.
- Provide quarterly reports to Board of Trustees on the effectiveness of the Trust's safeguarding strategy; compliance and updates on current legislation and any changes in Premier League/English Football League or FA Rules; or statutory agency legislative changes which impact the Trust.
- Represent the Trust and work in conjunction with the Club's Head of Safeguarding (HoS) to support as Lead Case Manager when cooperating with and reporting directly to external statutory agencies such as the Police, Local Safeguarding Adults At Risk Board and Adult Services. This includes the referral of cases of suspected radicalisation to the police or Channel Scheme.

9

Designated Safeguarding Officers (DSO)

The role of the Trust's Designated Safeguarding Officer is to:

- Support the Head of Skills and Safeguarding in promoting the moral and legal responsibilities in implementing procedures to provide a duty of care for adults at risk, safeguard their well-being and protect them from abuse and poor practice – primarily within a specific department of the Trust.
- To take responsibility for the day-to-day management of safeguarding issues and proactive promotion of safeguarding within the specified department.
- To be available at all reasonable times as a first contact for staff and person responsible; and if appropriate, external agencies regarding information or referral of safeguarding matters within the department.
- To record and refer on to the Head of Skills and Safeguarding all incidents, concerns, allegations, evidence of poor practice and evidence of best practice, in confidence, and in line with Data Protection legislation using the Trust's CPOMS system.
- To handle sensitively, in confidence, any safeguarding concerns raised within the department and around the Trust.
- To attend regular Trust safeguarding team meetings with relevant personnel, and undertake any actions raised at meetings and CPD events to keep up to date with current legislation.
- Be aware of safeguarding guidelines and legislation for compliance.

10

Mental Capacity

It is not for the Trust, employees, casual workers, agency staff, consultants or volunteers to decide about whether an adult at risk lacks mental capacity in relation to the concern in question, but it is useful to have an understanding of the notion of capacity explained below.

Definition:

The ability to decide at a particular time. The starting assumption must always be that a person has the capacity to make a decision, unless it can be established that they lack capacity.

The term “lacks capacity” means a person who lacks ability to make a particular decision or take a particular action for themselves at the time when the decision or action needs to be taken. This reflects the fact that some people may be unable to make some decisions for themselves but will have capacity to make other decisions. For example, they may be able to make small decisions about everyday matters such as what to wear or what to eat but lack capacity to make more complex decisions about financial matters.

This reflects that a person who lacks capacity to make a decision at a certain time may be able to make that decision at a later date - this may be due to illness or accident. Decisions about mental capacity are made by medical professionals.

If you are concerned about the welfare of an adult at risk, it is important to report your concerns to either a Designated Safeguarding Officer (DSO) or the Head of Skills and Safeguarding (HoSS).

Factors to considering when dealing with a person who may have mental health issues:

- Does the person have a general understanding of what decision they need to make and why they need to make it?
- Does the person have a general understanding of the likely consequences of making, or not making, this decision?
- Is the person able to understand, retain, use and weigh up the information relevant to this decision?
- Can the person communicate their decision?

11

The Statutory Principles:

The Mental Capacity Act 2005 sets out five statutory principles:

- A person must be assumed to have capacity unless it is established that they lack capacity.
- A person is not to be treated as unable to make a decision unless all practical steps to help him or her to do so have been taken without success.
- A person is not to be treated as unable to make a decision merely because she or he makes an unwise decision.
- An act done or decision made, for or on behalf of a person who lacks capacity must be done, or made, in their best interests.
- Before the act is done, or the decision is made, regard must be taken as to whether the purpose for which it is needed can be as effectively achieved in a less restrictive way taking into account the person's rights and freedom of action.

If you are satisfied that the person in question is able to cope with the interaction you are having with them based on the above factor's then treat them as you would any other person. If you are concerned that they may not necessarily understand taking into account, the above factors then seek advice as stated above.

12

Procedures for Gaining Consent

If concerns arise, consent must be obtained from the individual before a referral is made to the Local Safeguarding Adults at Risk Services or the Police. However, if others are at risk of harm the information should be passed to Local Safeguarding Adults at Risk Services or the Police even if consent is not obtained.

Information about an individual should not be given to family or carers without consent of the individual. If concerns arise and the individual is unable to give consent to information sharing, a referral should be made to statutory agencies. Family and/or carers should be informed if involved in the individual's life and not implicated in any way.

13

Information Sharing

Emergency situations may warrant the sharing of relevant information with emergency services without consent.

The law does not prevent the sharing of sensitive personal information within organisations if there is a safeguarding concern, sharing is justified.

The law does not prevent the sharing of sensitive personal information between organisations when it is in the public interest.

As long as it does not increase risk, the safeguarding lead should inform the person if they need to share their information without consent.

14

Safer Recruitment & Disclosure

As part of the Trust's recruitment and selection process, offers of work for positions which involve 'regulated activity' when working with adults at risk are subject to a satisfactory Enhanced Disclosure Barring Service (DBS) check and appropriate references.

All offers of work are subject to a satisfactory outcome to the screening process and until a satisfactory disclosure has been confirmed, the individual concerned will not be permitted to commence work. Please refer to Trust's Recruitment and Selection Policy and Appendix 4 within this document.

All employees, workers, consultants, agency staff and volunteers engaged in 'regulated activity' will be required to undergo regular DBS disclosure clearances, normally every 3 years or earlier if requested. However, for any role relating to the National Citizen Service (NCS) programme, the DBS is only valid for one year and then is subject to review.

We require all applicants to disclose any 'unspent' criminal convictions as part of their application. Under the Rehabilitation of Offenders Act 1974 as amended ex-offenders do not have to disclose 'spent' convictions. However certain types of posts, particularly those that involve working with adults at risk or other positions of trust or sensitive areas, are exempt from these provisions, and in these cases all convictions must be declared.

The Safeguarding Vulnerable Groups Act 2006 provides the legislative framework for the Vetting and Barring Scheme effective from October 2009. The criminal records checking regime, which in England and Wales is administered by the Disclosure and Barring Service, makes decisions about who will be barred from working with children and adults at risk. If a manager believes that the appointee to a vacancy will be working in a 'regulated' or 'controlled' position s/he will require an enhanced criminal records check to be undertaken before commencing employment.

Applicants must be made aware early in the recruitment process that a criminal records check will be required.

Should an individual's DBS check reveal any convictions the Trust will consider whether the nature of the offence or offences renders the person concerned unsuitable for working with adults at risk. In such circumstances, when the nature of any disclosure has to be considered, a risk assessment will be carried out to assess the information contained within the disclosure certificate. The individual may also be asked to attend an interview prior to a recruitment decision being made.

On occasions, the Head of Skills and Safeguarding (HoSS) and Head of Safeguarding (HoS) Premier League and/or The FA and/or the Local Safeguarding Adults At Risk Board Manager may be asked to attend the risk assessment meeting.

All new employees, workers, consultants, agency staff and volunteers working with adults at risk at the Trust will be required to complete a self-declaration on commencement of duties. The Trust will ensure that all agency staff and consultants working with children, young people or adults at risk in 'regulated activity' are subject to a satisfactory Enhanced DBS disclosure and sign a self-declaration form prior to engagement. Pending DBS clearance and obtaining references from previous employers they will not have unsupervised access to children, young people, and adults at risk during their time with the Trust.

It is essential that you complete the safer recruitment answers. Some posts are exempt from the Rehabilitation of Offenders Act 1974 by virtue of their nature; usually these are posts involving access to children, young people, and adults at risk. The Trust does not necessarily see a criminal record as a bar to employment and will consider the nature of the conviction and its relevance to the job applied for prior to making any selection decisions and in accordance with Schedule Four of the Criminal Justice and Court Services Act 2000 lists the offences that would automatically bar the offender from working with children, young people, and/or adults at risk.

15

Employee & Worker Training

All employees or workers working in direct contact with adults at risk shall be required to complete Safeguarding Vulnerable Adults (SOVA) Level 1, and will receive regular training appropriate to their role.

Details of those having achieved required mandatory and role specific training will be retained by the Head of Skills and Safeguarding and Business Support Officer.

It is ensuring that all members of staff discuss the basics of standard good practice in Safeguarding in their regular Professional Development Review meeting – as it impacts on their role. In addition, due to the demands placed on the Designated Safeguarding Officer (DSO) role a robust framework for one-to-one supervision, which provides a safe opportunity to promote critical analysis, professional development, and emotional resilience throughout the year.

16

Responsibility of Safeguarding Adults At Risk – Position of Trust & Duty of Care

The Trust acknowledges its responsibility to safeguard the welfare of every individual who has been entrusted to its care and is committed to working to provide a safe environment.

All employees, workers, consultants, agency staff and volunteers are accountable for the way in which they exercise authority, manage risk, use resources, and protect adults at risk from discrimination and avoidable harm. To always ensure best practice employees, workers, consultants, agency staff and volunteers must be fully aware of this safeguarding adults at risk policy and procedures and their responsibilities.

All employees, workers, consultants, agency staff and volunteers have a duty of care to keep individuals safe; this can be exercised through the development of respectful, caring, and professional relationships between adults and adults at risk.

Employees, workers, consultants, agency staff and volunteers must demonstrate integrity, maturity and good judgement whilst working with adults at risk. Any person responsible for an adult at risk, whether solely or jointly, is in a position of trust which requires behaviour to be in accordance with this policy.

Examples of positions of trust include (but are not limited to):

- A Head of a Department;
- Member of community staff or volunteer working with adults at risk;
- Coach;
- Learning mentor/tutor;
- Physiotherapist;
- Driver;
- Facilitator;
- Staff engaged in matchday activity involving adults at risk, including supervising mascots, ball boys and photographers.

17

Protecting Adults At Risk with Disabilities

For many years adults at risk with disabilities were not considered to be vulnerable to abuse. It is now known that this is not the case and that adults at risk with disabilities are at an increased risk of abuse and that the greater the disability the greater the risk. There are several factors that contribute to this and these include:

- Lack of friends and peer group to support and protect.
- Intimate or physical and or invasive medical care required. This can make it difficult for the adult at risk to know what is an acceptable and, unacceptable 'touch'.
- Lack of speech or limited communication, this makes it harder to report abuse.
- Multiple persons responsible – making it harder to identify who may be abusing.
- History of being told what to do and not given choices.
- Being dependent on the abuser for a service or basic need.
- Having medical conditions that are used to explain injuries.

Adults at risk with disabilities may also be less valued than their peers and poor care may be observed but tolerated by others. This might include such things as not speaking directly to the adult at risk; not offering choices, not moving, and handling them safely, not respecting their privacy and dignity, not treating them according to their age; allowing physical restraint to occur or using derogatory language.

There is no one way to ensure that adults at risk with disabilities are fully protected but the safest environments are those that assist adults at risk to protect themselves by helping them to speak out. Everyone must do their best to stop abuse from happening and take responsibility for observing, challenging, and reporting poor practice and suspected abuse.

18

Creating a Safe Environment

A safe environment is one where:

- Training in safeguarding and protection awareness takes place.
- Policies and procedures are known by all and followed.
- There is support for those who report suspicions or concerns.
- In addition, safe environments ensure that those working with adults at risk have established effective methods of communication with them, and this may require additional training and workforce development.
- Ensure that the adult at risk's health needs are known, recorded and that sufficient people know how to respond. This may mean knowing how to manage a seizure or an asthma attack. It may mean ensuring that medication is kept to hand, administered correctly, and recorded.
- Ensure a mobile phone is available and switched on.
- Discuss with person responsible any physical care that is required and how this can best be done with respect and dignity. This will usually mean same gender person responsible, and consistent parents or supporters. Consideration needs to be given to the balance of the need for privacy with the need for accountability and protection against allegations for person responsible. This is best done by consulting with parents or the individual concerned.
- Give the adult at risk every opportunity to make informed choices and respect their choice.
- Have clear strategies for dealing with difficult behaviour that excludes any kind of physical punishment or restraint.
- Listen to and support adults at risk.
- Involve adults at risk and their families wherever possible. This helps give all adults at risk a voice and may act to deter abusers.

19

Facilities Hiring & Third Party Working

Clubs or organisations hiring Trust facilities e.g., Cedars Youth and Community Centre and Meriden Community Centre or are employed to provide activities on behalf of the Trust which are regulated through the provision of teaching, training, instruction, care for or supervision of adults at risk must provide the Trust details of:

- Club's or organisation's safeguarding policy.
- Name of person responsible for the club's or organisation's safeguarding provisions.
- Evidence of Disclosure and Barring Service checks completed for all employees, volunteers, and instructors.
- Evidence of all employees, volunteers and instructors have undertaken some form of safeguarding adults at risk training.

The Trust will ensure that all agency staff and consultants working with adults at risk are subject to a satisfactory Enhance DBS check and sign a self-declaration on commence of duties.

Delivery of regulated curriculum activity, the Trust will work with and adhere to the college or education provider's safeguarding policy and procedure as directed. If the college or education establishment is unable to provide a 'fit for purpose' safeguarding policy and procedure, the Trust's own policy will be used and supersede that of the college or education establishment.

The hiring of facilities outside of the curriculum to provide activities which are regulated through the provision of teaching, training, instruction, care for or supervision of adults at risk the Trust will adhere to their own policy and notify school, college or education establishment of any incidents, concerns or allegations made.

20

Good Practice

All employees, workers, consultants, agency staff and volunteers working with adults at risk should adhere to the following principles and action (list is not exhaustive):

- Always work in an open environment (e.g., avoiding private or unobserved situations and encouraging open communication with no secrets).
- Adhere to the Trust's Lone Working Policy, Lone Worker Risk Assessment, and Missing Person Procedure.
- Make the experience of the activity fun and enjoyable.
- Promote fairness, confront, and deal with bullying.
- Treat all individuals equally and with respect and dignity.
- Always put the welfare of the adult at risk first.
- Maintain a safe and appropriate distance with adults at risk and avoid unnecessary physical contact.
- Where any form of manual or physical support is required it should be provided openly and with the consent of the adult at risk.
- Physical contact can be appropriate so long as it is neither intrusive nor disturbing and the adult at risk's consent has been given.
- If groups must be supervised in changing rooms always ensure coaches etc. work in pairs.
- Request written consent if Trust officials are required to transport adults at risk.
- Gain written consent for any significant travel arrangements e.g., overnight stays.
- Staff or volunteers are qualified and a qualified first aider is in attendance.
- Ensure that at away events adults should not enter an adult at risk's room or invite adults at risk to their rooms.
- Be a good role model, this includes not smoking or drinking alcohol in the company of adults at risk.
- Always give enthusiastic and constructive feedback rather than negative criticism.
- Secure written parental consent for the Trust to act in loco parentis, to give permission for the administration of emergency first aid or other medical treatment if needed.
- Keep a written record of any injury that occurs, and details of any treatment given using the Trust's CPOMS reporting system.
- Adopt all other good practice and common-sense principles given the varying situations.

21

Signs, Indicators & Forms of Poor Practice & Abuse

Abuse categories – adults at risk neglect and acts of omission:

Physical | Sexual | Psychological (including domestic abuse) | Financial | Organisational | Discriminatory | Self-Neglect | Modern Slavery

Psychological

Psychological abuse includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation, or unreasonable and unjustified withdrawal of services or supportive networks. Psychological abuse is the denial of a person's human and civil rights including choice and opinion, privacy and dignity, and being able to follow one's own spiritual and cultural beliefs or sexual orientation. It includes preventing the adult from using services that would otherwise support them or enhance their lives. It also includes the intentional or unintentional withholding of information (e.g. information not being available in different format/languages etc.).

Domestic Abuse

Domestic abuse was defined by The Home Office in March 2013 as 'any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over, who are or have been intimate partners or family members regardless of gender or sexuality.

Neglect

Neglect and acts of omission includes ignoring medical, emotional, or physical care needs, failure to provide access to appropriate health, care and support or educational services, and the withholding of the necessities of life such as medication, adequate nutrition, and heating.

Neglect also includes a failure to intervene in situations that are dangerous to the person concerned or to others, particularly when the person lacks the mental capacity to assess risk for themselves.

Neglect and poor professional practice may take the form of isolated incidents or pervasive ill-treatment and gross misconduct. Neglect of this type may happen within a person's own home or in an institution/within an organisation/service. Repeated instances of poor care may be an indication of more serious problems. Neglect can be intentional or unintentional.

Physical

Physical abuse includes hitting, slapping, pushing, kicking, misuse of medication, being locked in a room, inappropriate physical sanctions, or force feeding, inappropriate methods of restraint, or unlawfully depriving someone of their liberty.

Sexual

Sexual abuse includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault, or sexual acts to which the adult has not consented or was pressured into consenting.

Additional symptoms include:

- Urinary tract infections or sexually transmitted diseases.
- Signs of sexual activity having taken place e.g. a woman who lacks the capacity to consent to sexual intercourse becomes pregnant.
- Pain, soreness, itchiness.
- Person discloses fully or partially that sexual abuse is occurring or has occurred in the past.
- Person exhibits significant change in sexual behaviour or outlook.

22

Poor Practice & Abuse

This takes place whenever staff or volunteers fail to fulfil the highest standards of care and support in their working practice. Poor practice which can continue can cause harm and can become abuse. Poor practice is unacceptable and will be treated seriously with appropriate action. Please see the Trust's Discipline, Grievance and Harassment Policy. An individual may not be aware that poor practice or abuse is taking place, as they may deem the behaviour as 'acceptable'. The following are regarded as poor practice and may be considered as high-risk offending factors and therefore should be avoided:

- Unnecessarily spending excessive amounts of time alone with adults at risk away from others.
- Being alone in changing rooms, toilet facilities or showers used by adults at risk.
- Taking adults at risk alone in a car on journeys, however short.
- Taking adults at risk to your home where they will be alone with you.
- Sharing a room with an adult at risk.
- Engaging in rough, physical, or sexually provocative games, including horseplay.
- Allow or engage in inappropriate touching of any form.
- Allowing adults at risk to use inappropriate language unchallenged.
- Making sexually suggestive comments to an adult at risk, even in fun.
- Reducing an adult at risk to tears as a form of control.
- Allow allegations made by an adult at risk to go unchallenged, unrecorded, or not acted upon.
- Do things of a personal nature that the adult at risk can do for themselves.
- Communicate with an adult at risk via social media on a personal basis – please refer to Trust's Social Media Policy.
- Communicate with an adult at risk using electronic communication unless this is on a business level.
- If in doubt... Do not do it!

Remember, always challenging poor practice such as racism, sexism, homophobia, bullying, foul, aggressive or provocative language or any controlling behaviour that upsets adults at risk is vital. Never ignore bullying or verbal abuse by supporters, person responsible, coaches, children, or young people. Listen to and support the person being targeted. Explain to the bully that poor behaviour is unacceptable. Refer to the Trust's Anti-Bullying and Harassment Policy where appropriate.

23

What to do if you Receive a Safeguarding Disclosure from an Adult At Risk

It is not the responsibility of anyone within the Trust to decide whether or not abuse has taken place.

All staff and volunteers have a responsibility to ensure the safety and welfare of adults at risk, including taking appropriate steps (including those set out in this procedure) to ensure that suspicions and allegations of abuse and poor practice are taken seriously and reported immediately and appropriately.

The Trust will assure all staff and volunteers that it will fully support and protect anyone, who in good faith reports his or her concern that a colleague or another is, or may be, abusing an adult at risk.

Adults at risk who may be vulnerable are likely to disclose abuse, or radicalisation to those they trust and how one responds to a disclosure is crucial.

Deal with the disclosure as it happens and ensure that the adult at risk's immediate needs are met and that they feel supported. When a disclosure is made, it is most important to understand that you must not investigate the disclosure yourself. The disclosure must always be taken seriously and dealt with according to the guidance in this Policy, even if the truth of the disclosure is uncertain.

You are not expected to act as a social worker, counsellor, judge, jury, or avenge the abuser; you are expected to act in the best interest of the adult at risk. Please refer to Appendix 2. 'What to Do if You Receive a Safeguarding Disclosure.'

24

Information for the Local Safeguarding Adults at Risk Services or the Police About Alleged Abuse

To ensure that this information evidentially sound, a detailed record should always be made using Incident Report form of CPOMS system at the time of the disclosure/concern, and subsequently submitted to the relevant Designated Safeguarding Officer (DSO) or Head of Skills and Safeguarding (HoSS) who will then support and advise you through ongoing process.

Establishing the victim's wishes:

It is very important that you do not investigate the concerns of the victim, though if the opportunity arises in a non-emergency situation it is important to gain the adult's wishes in relation to the concern.

Liaise with the Designated Safeguarding Officer (DSO) or the Head of Skills and Safeguarding (HoSS), particularly if the adult states who they would prefer to talk to, the Police or their Social Worker.

Preserving the evidence:

Your first concern is the safety and welfare of the adult at risk. However, your efforts to preserve evidence may be vital. In all cases the preservation of evidence is crucial especially if the Police investigation is to be effective. What you do or do not do in the time whilst you are waiting for the Police to arrive may make all the difference. Below are some helpful aims:

In situations of physical and/or sexual assault:

- In physical abuse cases, where an individual's wishes to show you an injury, only observe what they consent to show you and what is appropriate.
- Do not touch what you do not have to. Wherever possible leave things as they are. Do not clean up, do not wash anything or in any way remove fibres, blood etc. If you do have to handle anything at the scene keep this to a minimum.
- Do not touch any weapons unless they are handed directly to you. If this happens, keep handling to a minimum.
- Place the items or weapons in a clean dry place to hand to the Police.
- Preserve anything that was used to comfort the abused person, for example a blanket.
- Secure the room. Do not allow anyone to enter unless strictly necessary to support you or the abused person, until the Police arrive.
- Prior to the arrival of the Police and medical examination:
- Ensure that no one has physical contact with both the abused person and the alleged abuser as cross contamination can destroy evidence.

- Encourage the victim not to shower.
- Encourage the victim not to change clothing.
- Even when the victim says they do not want Police involvement, preserve items anyway as they may change their mind later or you may be legally obliged to inform the Police.
- Encourage the person not to eat or drink if there is a possibility that evidence may be obtained from the mouth.
- Ensuring the individual is in a place of safety:

It is essential that, whatever the nature of the suspected abuse, the adult at risk is separated from the person who is or is thought to be the abuser. It is important that disruption to the life of the victim is kept to a minimum, therefore, if it is possible for the alleged perpetrator to leave the scene, this should be the preferred option. However, if it is not possible, an alternative place of safety should be sought as the immediate safety of the victim is the highest priority.

How to Get Help Urgently:

Emergency services should be summoned whenever a situation is felt to be beyond the control of employees, casual workers, agency staff, consultants or volunteers. Report the matter to the Head of Skills and Safeguarding at the earliest opportunity. In the absence of Head of Skills and Safeguarding, contact the Adult Social Services Team for advice and to ensure that the correct procedure is followed.

25

Safeguarding Allegations Against Staff

The Trust will always take concerns and allegations about employees and volunteers seriously and will respond in a way that places the protection and needs of adults at risk first. The procedure will always be followed in respect of all cases where it is alleged that an employee or a volunteer has:

- Behaved in a way that has, or may have, harmed an adult at risk. Possibly committed a criminal offence against, or related to, an adult at risk.
- Behaved in a way that indicates s/he is unsuitable to work with adults at risk. This can include behaviour in their personal life that raises safeguarding concerns.
- The Trust will always inform the police when information is received that indicates that the criminal law has been, or may have been, broken. Additionally, the Trust will inform other Statutory and Regulatory Authorities/Agencies when it is required to do so or when the circumstances regarding the allegations are such that the Authorities/Agencies should be so notified.
- The Trust will work with openness and transparency with all Authorities/Agencies.
- The Head of Skills and Safeguarding (HoSS) will have full oversight of any allegations against employees or volunteers who work with adults at risk. The Trust's Community Director and The Club's Head of Safeguarding (HoS) will also be informed at each stage of any allegation and or concern. The Head of Skills and Safeguarding (HoSS) will hold management responsibility and the Club's Head of HR will hold responsibility for advising on all aspects of the HR processes.
- There will be circumstances when the policy and procedures may be used concurrently with other procedures such as Disciplinary, Whistleblowing and Complaints procedures. In such circumstances, the safeguarding process takes precedence, and other processes may need to be suspended whilst safeguarding processes are completed.
- In circumstances where a whistleblowing event or other complaint is made of which the where safeguarding allegations or concern against employees or volunteers is only minor element nevertheless, the safeguarding concerns must be addressed using this policy and procedure and may require other processes to be delayed.
- The Trust recognises that adults at risk, and some employees may have disabilities that require reasonable adjustments to be made to this procedure in accordance with The Equality Act 2010. In such cases, the Head of Skills and Safeguarding (HoSS) will make these adjustments in consultation and agreement with the Head of HR.
(See separate Managing Allegations Against Employees, Workers, Consultants, Agency Staff or Volunteers – Appendix 5).

26

PREVENT – Radicalisation & Extremism

The following definitions are taken from the HM Government Prevent Strategy 2011.

Radicalisation is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate on terrorist activity. During the process of ‘radicalisation’ it is possible to intervene to prevent vulnerable people being drawn into terrorist-related activity.

Extremism is vocal or active opposition to fundamental British values including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of the armed forces. Please note that being drawn into terrorism includes not only violent extremism but also non-violent extremism. Extremism can take several forms, including Islamist extremism, far right and animal rights extremism for example.

The Prevent Duty is part of the UK Counter Terrorism Strategy (CONTEST), based on the Counter Terrorism and Security Act of 2015. It requires public bodies, including local authorities, the police, prisons, providers of probation services, schools, colleges, and universities to act to prevent people from being drawn into terrorism, ensuring awareness of risks of terrorism.

The Prevent duty applies to those bodies, which include, for example, children’s homes and independent fostering agencies and bodies exercising local authority functions whether under voluntary delegation arrangements or via the use of statutory intervention powers. These bodies should ensure they are part of their local authorities’ safeguarding arrangements and that staff are aware of and know how to contribute to Prevent-related activity in their area where appropriate.

The Club recognises that some adults at risk are more vulnerable to radicalisation, including those who may be isolated/marginalised in society (through mental health or disability) and may have no other support. Adults at risk who attend activities are not immune from this risk and therefore the Trust and Club ensure that all staff who work with adults at risk are equipped at identifying potential indicators of abuse regarding radicalisation and extremism.

There are often no obvious signs of extremism. There are frequent requests for a list of signs, but although changes in behaviour and dress are often cited as signs of extremism these will often be signs of perfectly normal behaviour, particularly among young people in their late teens and early 20s. There are some physical signs that would indicate concerns relating to extremism such as the tattoos that far right organisation supporters will sometimes display.

You are not expected to be aware of the significance of tattoos but if you are worried about someone with what you think may be far right tattoos you should pass the details on to a Designated Safeguarding Officer or Head of Skills and Safeguarding. They can contact local Prevent coordinators for help if needed. You should follow the Notice, Check, share approach used by provider organisations.

- **Notice:** you should be aware of any behaviour which leads to any safeguarding concerns including Prevent duty related ones.
- **Check:** you should check what their concerns.
- **Share:** you should refer any concerns to the safeguarding officer or team.

Any concerns you have will usually be similar to other safeguarding concerns. These may include changes in behaviour; you should use your judgement to decide when these are worrying and when they are within the normal range. There are concerns which should always be passed on such as:

- Evidence of sharing of extremist websites.
- Evidence of homophobic.
- Religion based or racist bullying.

It is your own judgement which will lead you to decide to refer a safeguarding concern whether that relates to extremist exploitation or any other kind of exploitation. It should be noted that individuals taking their religion more seriously, choosing to grow a beard or wearing a headscarf for religious reasons are NOT signs of extremism.

27

Historical/Non-Recent Concerns of Abuse

Referral of concern about historical and non-recent abuse should be continued to be made directly to the Head of Skills and Safeguarding (HoSS) or parent Club's Head of Safeguarding (HoS) or alternatively, directly to the FA's Safeguarding Team via safeguarding@thefa.com. A helpline is available 24 hours a day on 0800 023 2642.

28

Peer-on-Peer Abuse

Peer-on-peer abuse is any form of physical, sexual, emotional, and financial abuse, and coercive control exercised between adults at risk, and within adults at risk's relationships (both intimate and non-intimate), friendships, and wider peer associations.

Peer-on-peer abuse can take various forms, including (but not limited to): serious bullying (including cyberbullying), relationship abuse, domestic violence and abuse, exploitation, harmful sexual behaviour and/or prejudice-based violence including, but not limited to, gender-based violence.

Online peer-on-peer abuse is any form of peer-on-peer abuse with a digital element, for example, sexting, online abuse, coercion and exploitation, peer-on-peer grooming, threatening language delivered via online means, the distribution of sexualised content, and harassment.

29

County Lines

It often involves the exploitation of adults, as gangs use individuals and those with mental health or addiction problems to transport drugs and money. These gangs establish a base in the location they are targeting, often taking over the homes of local adults at risk by force or coercion in a practice referred to as 'cuckooing'. Cuckooing is the term used when gangs establish a base in the location they are targeting, often taking over the homes of vulnerable adults by force or coercion. Possible signs and indicators may include:

- Lone individuals from outside of the area.
- Individuals with multiple mobile phones or tablets or 'SIM' cards.
- Adults at risk with more money, expensive clothing, or accessories than they can account for.
- An increase in anti-social behaviour around the property.
- Something an individual or person responsible has told you.

30

Use of Photography & Film Images

The Trust takes its guidance on the use of images from guidelines issued by The FA and Premier League. All images are taken by Trust officials or approved third parties who have been briefed by the Trust's Head of Skills and Safeguarding (HoSS) or by a member of the Communications and Marketing Department responsible for the activity being photographed or filmed.

- Before the taking images of adults at risk, consent must be sought in writing, prior to the event or activity.
- Person responsible is responsible for informing the Trust of any change of circumstances within the season which may affect consent.
- Person responsible will be informed of how the image will be used. The Trust will not allow an image to be used for something other than that for which it was initially agreed.
- All participants featured in Trust publications will be appropriately dressed.
- If possible, the image will focus on the activity taking place and not a specific adult at risk.
- Where appropriate, images will represent the broad range of people participating safely in the event.
- Trust photographers will, where applicable, undertake a DBS check and attend an FA Safeguarding for All Workshop; and in any case will be personally responsible for keeping up to date with the latest guidelines on the 'Use of Images' policies from the Premier League. Trust identification will be worn at all times.
- Adults at risk who are the subject of a court order will not have their images published in any Trust document.
- No images of adults at risk featured in Trust publications will be accompanied with personal details such as their home address.
- Recordings of adults at risk for the purposes of legitimate reasons i.e., recorded event, coaching aids and will only be filmed by Trust officials and stored safely and securely at the Trust's premises.
- Mobile phone cameras are not to be used in changing rooms.
- Any instances of inappropriate images in football should be reported to the Head of Skills and Safeguarding or Designated Safeguarding Officer.
- The Trust does not put adult at risk's profiles with images and personal information on its website or social media.
- Images must not be taken or stored on personal devices, I.E., mobile phones, tablets etc.

31

E-Safety

E-safety guidance is designed to protect adults at risk who are supported by the Trust and Club and who make use of information technology (such as mobile phones/devices, games consoles and the Internet) as part of their involvement with the Trust and Club. The separate guidance is designed to provide staff and volunteers, with the overarching principles that guide our approach to e-safety. This can be found on the Trust's intranet under HR forms. To ensure as a Trust that, we work in line with our values, and within the law, in terms of how we use information technology and behave online.

32

Social Networking Guidance

The Trust recognises that social media and social networking services provide opportunities to effectively engage with a wide range of audiences in a positive manner. However, the Trust is also aware of the potential safeguarding risks especially to adults at risk when using these forms of media.

- Do not add or invite adults at risk you have responsibility for in football to be 'friends' within social networking sites such as Facebook, Instagram.
- Do not follow or accept adults at risk you have responsibility for in football on social media if they try and "add" you on sites such as Twitter.
- Avoid 'one to one' electronic communication. Where you do communicate electronically ensure you send this communication to the person responsible as well as the adult at risk.
- Social networking is dealt with in full in the Trust's Social Media Policy.

33

Confidentiality

Employees, workers, consultants, agency staff and volunteers may have access to confidential information about adults at risk in order to undertake their responsibilities. In some circumstances, employees, workers, consultants, agency staff or volunteers may be given highly sensitive or private information. They should never use confidential or personal information about an adult at risk or his/her family for their own or others' advantage. Information must never be used to intimidate, humiliate, or embarrass an adult at risk.

Confidential information about an adult at risk should never be used casually in conversation or shared with any person other than on a need-to-know basis. In circumstances where the adult at risk's identity does not need to be disclosed, the information should be used anonymously.

There are some circumstances in which an employee, worker, consultant, agency staff or volunteer may be expected to share information about an adult at risk, for example when abuse is alleged or suspected. In such cases, individuals have a duty to pass information on without delay, but only to those with designated safeguarding responsibilities.

If an employee, worker, consultant, agency staff or volunteer is in any doubt about whether to share information or keep it confidential, they should seek guidance from the Trust's safeguarding team. Any media or legal enquiries should in the first instance be referred to the Trust's Community Director. The storing and processing of personal information about children is governed by the Data Protection Act, 2018. For further information on the Trust's (and your) obligations under the Data Protection Act 2018, please see the Trust's Data Handling & Protection Policy, available on the parent Club's intranet. This means that employees, workers, consultants, agency staff and volunteers:

- Are expected to treat information they receive about adults at risk in a discreet and confidential manner.
- Should seek advice from the Head of Skills and Safeguarding (HoSS) if they are in any doubt about sharing information they hold, or which has been requested of them.

Appendices

Appendix 1.

Signs & Indicators of Abuse

Appendix 2.

What to Do if You Receive a Safeguarding Disclosure From an Adult At Risk

Appendix 3.

Dealing With Concerns in a Football Setting

Appendix 4.

DBS Assessment Procedure

Appendix 5.

Managing Allegations Against Employees, Workers, Consultants, Agency Staff or Volunteers

Appendix 6.

Internet Grooming

Appendix 7.

Key Safeguarding Contacts

Appendix 8.

Departmental Designated Safeguarding Officers (DSO)

Appendix 9.

Key Safeguarding Contacts

Appendix 10.

Other Applicable Club Policies

Appendix 1. Signs & Indicators of Abuse

One or more of the following might trigger concerns about an adult at risk:

- A sudden change in behaviour.
- Something an individual says.
- Physical signs of abuse.

The signs may vary according to the age and understanding of the adult at risk.

Type of Abuse	Physical Signs	Behavioural Signs
Physical Abuse	Physical signs such as unexplained and unusual bruising, finger and strap marks, injuries, cigarette burns, bite marks, fractures, scalds, missing teeth.	Behavioural signs such as fear of contact, aggression, temper, running away, fear of going home, reluctance to change or uncover body, depression, withdrawal, bullying or abuse of others.
Neglect	Physical signs such as constant hunger, ill-fitting or inappropriate clothes, weight change, untreated conditions, continual minor infections, failure to supply hearing aids, glasses and or inhalers.	Behavioural signs such as always being tired, early or late, absent, few friends, regularly left alone, stealing, no money, parent or person responsible not attending or supportive.
Sexual Abuse	Physical signs such as genital pain, itching, bleeding, bruising, discharge, stomach pains, discomfort, pregnancy, incontinence, urinary infections or STDs, thrush, anal pain on passing motions.	Behavioural signs such as apparent fear of someone, nightmares, running away, sexually explicit knowledge or behaviour, masturbation, bed-wetting, eating problems, substance abuse, unexplained money or gifts, acting out with toys, self-harm.
Bullying	Physical signs such as weight change, unexplained injuries and bruising, stomach and headaches, bed-wetting, disturbed sleep, hair pulled out.	Behavioural signs such as difficulty making friends, anxiety over school, truancy, withdrawn, anger, moodiness, suicide attempts, reduced performance, money and possessions reported as lost, stealing from within the family, distress and anxiety on reading texts or e-mails.
Emotional Abuse	Physical signs such as weight change, lack of growth or development, unexplained speech disorders, self-harm, clothing inappropriate for adult's age, gender or culture etc.	Behavioural signs such as unable to play, fear of mistakes, fear of telling parents, withdrawn, unexplained speech and language difficulties, few friends.
Radicalisation	Physical signs such as they are observed downloading, viewing or sharing extremist propaganda from the web. They may change their appearance, their health may suffer (including mental health) and they may become isolated from family, friends, peers or social groups.	They become withdrawn and focused on one ideology. They express a desire/ intent to take part in or support extremist activity. Their views become increasingly extreme regarding another section of society or government policy. An individual becomes increasingly intolerant of more moderate views.

Appendix 2. What to Do if You Receive a Safeguarding Disclosure From an Adult At Risk

Stage 1

Deal with the disclosure as it happens and ensure that the adult at risk's immediate needs are met and that they feel supported. When a disclosure is made, it is most important to understand that you must not investigate the disclosure yourself. The disclosure must always be taken seriously and dealt with according to the guidance in this Policy, even if the truth of the disclosure is uncertain. **You are not expected to act as a social worker, counsellor, judge, jury, or avenge the abuser; you are expected to act in the best interest of the individual who may be at risk.**

YOU MUST:

- Put your own feelings aside and listen as if the information is not sensational.
- Allow the adult at risk to lead the discussion and to talk freely.
- Listen to what the adult at risk is saying. Try not to interrupt them or ask lots of questions. Being asked a lot of questions can feel like being interrogated.
- Let them tell you at their own pace. Do not worry if the adult at risk stops talking for a while – silences are OK. You do not have to rush to fill in the gaps.
- Accept what the adult at risk says without challenge.
- Listen to the adult at risk without investigating.
- Allow the adult at risk to talk but protect them from sharing the information with too many other people.
- Provide reassurance that you are taking them seriously.
- Let the adult at risk know that you understand how hard it is for them to tell.
- Let them know they are doing the right thing by speaking out.
- It is ok to let them know if you are unable to answer all their questions.
- Avoid using questions such as “Is there anything else you would like to tell me?”.
- Avoid asking leading questions like “Did the coach hit you?”.
- Never ask questions that may make the adult at risk feel guilty or inadequate.
- If physical abuse has taken place, you may observe visible bruises and marks but do not ask an adult at risk to remove or adjust their clothing to see them.
- Tell the adult at risk you will be contacting the Head of Skills and Safeguarding (HoSS) and that you will support them throughout.
- Once you have established that they have been harmed or are at risk of being harmed, do not pursue the conversation any further. This is important to ensure that questions cannot be raised later about possible manipulation of the disclosure.
- Respect the confidentiality of the disclosure and do not share the information with anyone other than those who need to know. Those who need to know are those who have a role to play in protecting adults at risk.

REMEMBER!

When an adult at risk discloses, they may feel:

- **Guilt:** They may blame themselves for the abuse and often feel guilt for telling.
- **Ashamed:** They may feel mortified about the abuse itself.
- **Confused:** They may be muddled about their feelings for the alleged abuser.
- **Scared:** They may fear the repercussions. They may fear the alleged abuser.

Be careful about touching (e.g., hugging or cuddling) the adult at risk if they have not initiated the contact. They may be upset by physical contact.

Stage 2

As soon as possible, once the immediate comfort and safety of the adult at risk is secured, you must inform the Trust's Head of Skills and Safeguarding (HoSS) of the disclosure. If you are concerned about the adult at risk's immediate safety and/or are having difficulty contacting either the Head of Skills and Safeguarding (HoSS) or if the Head of Skills and Safeguarding (HoSS) is the alleged abuser then contact the designated Board of Trustees Safeguarding Lead or Community Director. Every effort should be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a need-to-know basis only.

Stage 3

You should note down details as soon as possible after the disclosure has been made. What is clearly etched at the time can become blurred after a few hours. It is vital that you make clear and concise notes soon after the disclosure to complete a more detailed record and safeguarding incident sheet later.

Immediate notes should include:

- Date and time.
- Place and context of disclosure or concern.
- Important facts provided, e.g., names mentioned.

Wherever possible, you must record information as it was relayed to you using the language of the adult at risk rather than your own interpretation of it. It is important to report factual information rather than your assumption or interpretation. Please follow the guidance on the safeguarding incident report form.

What Happens Next?

It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. You should be informed by the Trust's Head of Skills and Safeguarding (HoSS) within 24 hours what has happened following the report being made. If you do not receive this information, you should be proactive in seeking it out.

If you have concerns that the disclosure has not been acted upon appropriately, you should inform the Trust's Community Director if unavailable the Head of Safeguarding (HoS), and ultimately contact the relevant statutory agency.

A disclosure is not the only way that you may be made aware of a problem. Sometimes another adult or even a child may say something about a possible abusive situation.

Deal With It in the Same Way!

On occasions, you may witness an incident that may cause concern or indeed you may pick up on things that cause concern to you. Information may be passed to a Coach or Project Lead anonymously by a person or persons who do not want to be directly involved for whatever reason. However, you come upon information that causes concern and may put others at risk, the action should always be the same.

Taking No Action Is Not an Option

All matters will be fully investigated, and appropriate action will be taken. Action may include referral to the Police, Adult Services, Premier League or The FA if deemed as appropriate by the Head of Skills and Safeguarding (HoSS). Any referral to an external agency shall also be reported to the Board of Trustees Safeguarding Lead and Community Director. Full contact details can be found in Appendix 7 and 8.

Remember the Adult's Welfare Is of Paramount Importance

Full details of dealing with concerns in a football setting at the Trust can be found in Appendix 3 of this policy.

Safeguarding Procedures

The Trust takes any form of safeguarding poor practice or abuse seriously to promote a culture of best practice and accountability.

The Trust encourage all employees, workers, consultants, agency staff and volunteers to raise concerns they may have about any safeguarding poor practice or abuse as early as possible to the relevant personnel. The Trust will respond accordingly to promote a safer environment.

If you have any questions regarding this section of the Safeguarding Adults At Risk Policy and Procedures, please contact the Trust's Head of Skills and Safeguarding (HoSS).

Procedure for Raising a Safeguarding Concern

How to raise a concern? You do not need to have firm evidence before raising a concern. But we do ask that you explain as fully as you can the information or circumstances that gave rise to your concern.

Stage 1

If you have a concern of any form of safeguarding poor practice or abuse, raise it first with the Designated Safeguarding Officer (DSO), who will raise it with the Trust's Head of Skills and Safeguarding (HoSS).

Stage 2

If you feel unable to raise the matter with the Designated Safeguarding Officer (DSO) for whatever reason, raise the matter with the Trust's Head of Skills and Safeguarding (HoSS).

Stage 3

If these channels have been followed and you still have concerns, or if you feel that the matter is so serious that you cannot discuss it with any of the above, please contact The Head of Safeguarding at the Premier League on 020 7864 9000 – please refer to Trust's Confidential Reporting Procedure.

Steps will then be taken to fully investigate the matter to decide what appropriate action should be taken. The Trust is committed to protecting adults at risk and will take action to uphold this commitment.

Remember the Five 'R's'

RECOGNISE

- Recognising abuse or harm is often not easy.
- You need to act when you suspect Harm or Abuse is or has taken place, not just when you are sure that harm has occurred.
- You may not have proof, but it does not mean you are jumping to conclusions, it simply means you do not have the proof that the abuse is taking place.
- As soon as you suspect any kind of Abuse or Harm you should raise the concern.

RESPOND

- Responding to abuse is vital, and you have a responsibility to report any concerns you have to the safeguarding team – first instance HoSS or nominated DSO and your line manager.
- You may need to find out the basic facts, ensure you allow the individual to speak without interruption, do not make any judgement.
- Reassure them and let them know that you are going to have to speak to somebody to ensure that they are safe.

REFER/REPORT

- Contact your DSO or HoSS, if you cannot reach them contact your line manager, you should also consider contacting local authorities. For example, the Police or social services.

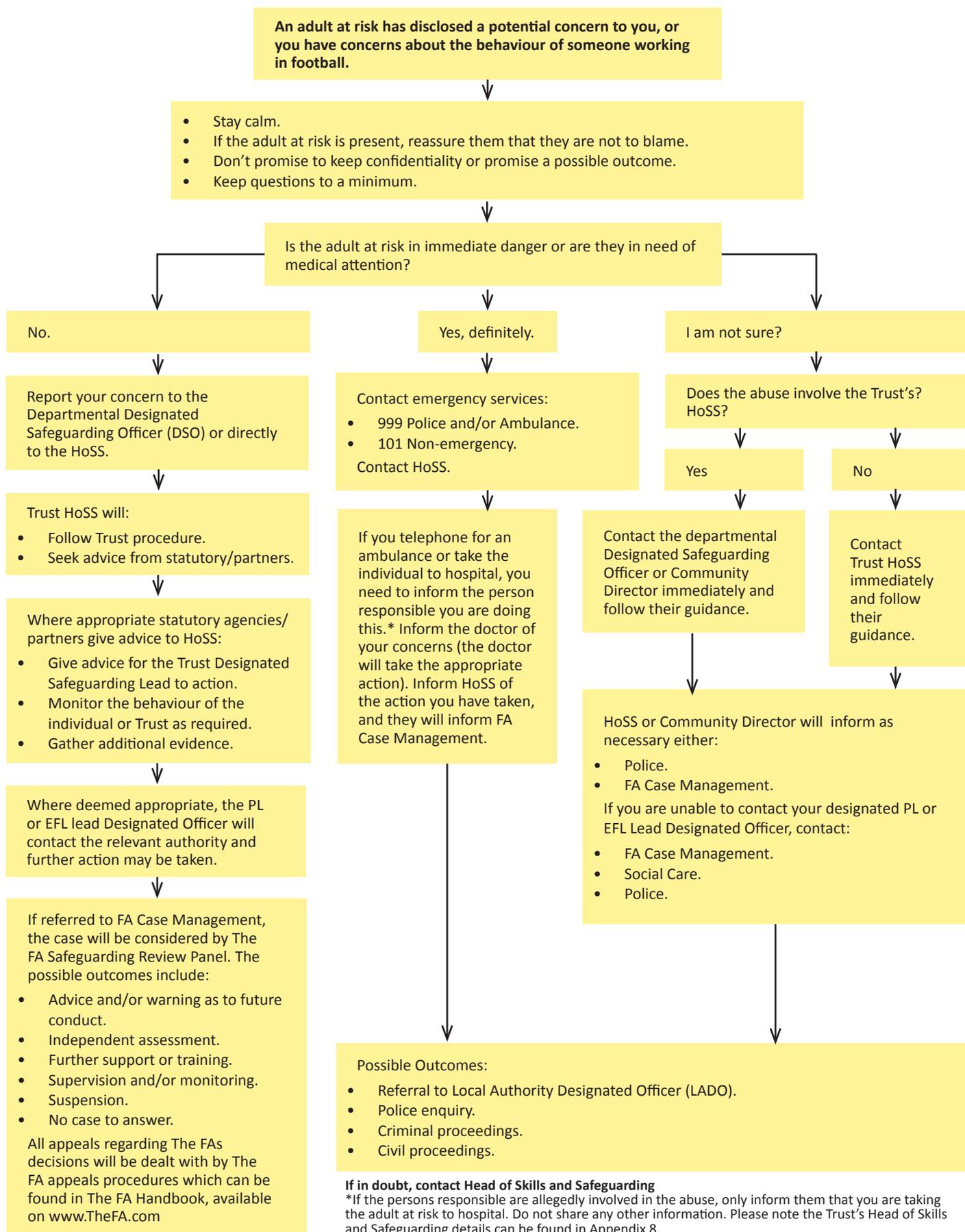
RECORD

- You should also make sure you make a note of any disclosure so that this can be recorded on the Trust's secure Child Protection Online Management System (CPOMS).

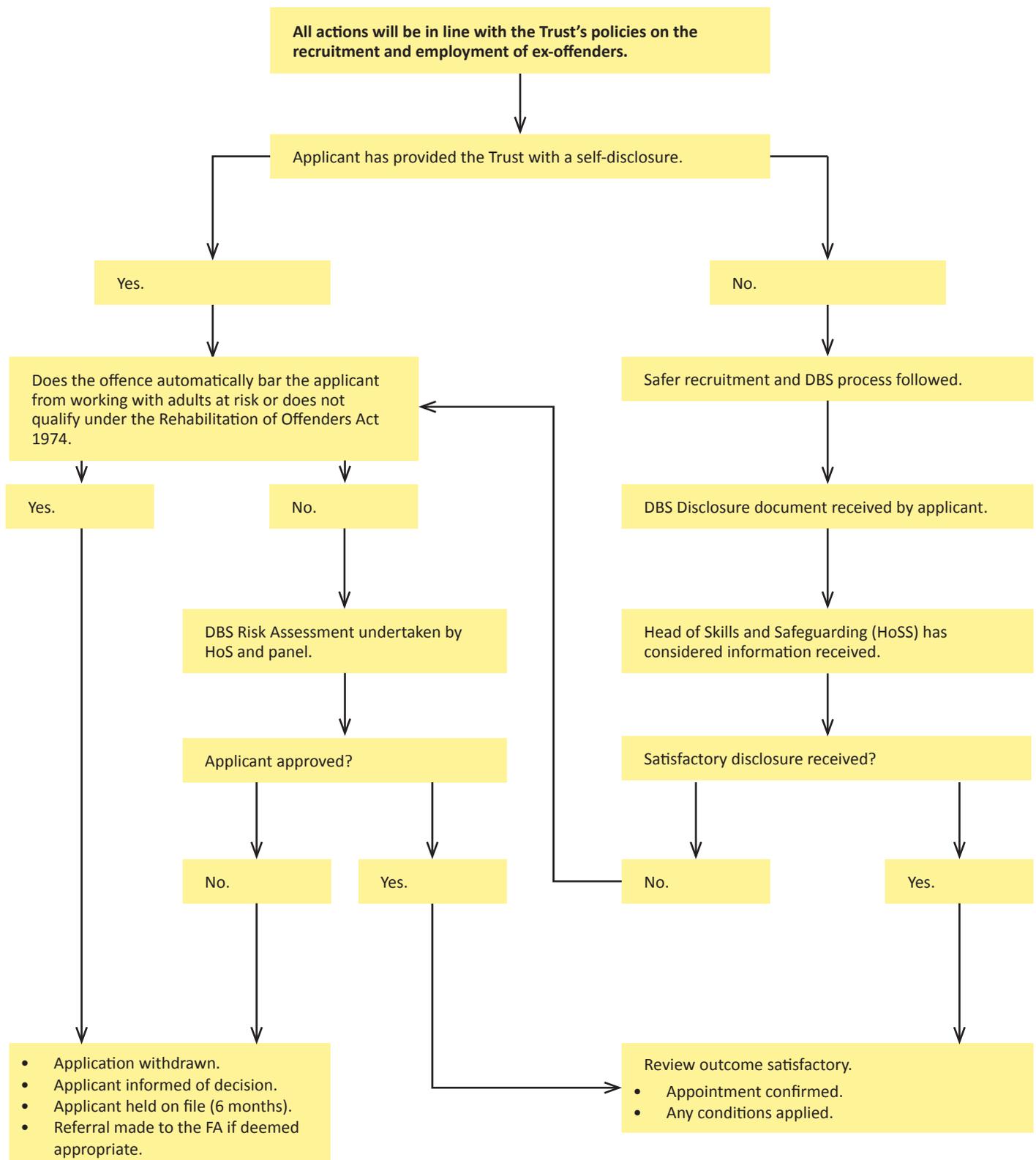
RESPECT

- Respect the confidentiality of the discloser and do not share information with anyone other than those who need to know.
- Those who need to know have a role to play in protecting adults at risk.

Appendix 3. Dealing With Concerns in a Football Setting



Appendix 4. DBS Assessment Procedure



Appendix 5. Managing Allegations Against Employees, Workers, Consultants, Agency Staff or Volunteers

Safeguarding allegation raised about the conduct or behaviour of an employee, worker, consultant, agency staff or volunteer.

Is the concern about the Head of Skills and Safeguarding or Designated Safeguarding Officer?

Yes.

No.

Inform the Community Director immediately, and the employee, worker, consultant, agency worker or volunteer raising the concern should complete the Incident Report form as soon as possible and within 24 hours and send it to the Community Director.

Inform the Head of Skills and Safeguarding immediately and the employee, worker, consultant, agency staff or volunteer raising the concern should complete the Incident Report as soon as possible and within 24 hours and send to the Safeguarding Team.

Community Director (if the allegation is a member of the Safeguarding Team) decides whether the employee, worker, consultant, agency staff or volunteer has:

- behaved in a way that has harmed an adult at risk.
- possibly committed a criminal offence towards an adult at risk.
- behaved towards an adult at risk in a way that indicates they are unsuitable to work with adults at risk.

Safeguarding Team/Head of HR complete the relevant sections of the Incident Report form or via CPOMS system.

Head of Skills and Safeguarding Team/Head contact Hertfordshire Safeguarding Adults Unit and/or Police for advice and support. The Head of Skills and Safeguarding and Community Director will act on the advice of Hertfordshire Safeguarding Adults Social Care and the Police. The Trust will also inform the Premier League and The FA.

The Trust will decide whether to suspend the employee, worker, consultant, agency staff or volunteer pending the statutory investigations and inform the Hertfordshire Safeguarding Adults Social Care and Police of the Trust's decision.

Once any statutory investigations are concluded or where appropriate in parallel, the Trust will undertake its investigation and decide what sanction should be taken against the employee, worker, consultant, agency staff or volunteer. If the employee, worker, consultant, agency staff or volunteer is removed from their role in working with adults at risk, a referral will be made to the Disclosure and Barring Service (DBS).

The Trust will decide whether to suspend the employee, worker, consultant, agency staff or volunteer pending the statutory investigations and inform Hertfordshire Safeguarding Adults Social Care and Police of the Trust's decision.

Appendix 6. Internet Grooming

The message to all adults at risk is that it is not okay for someone to expect them or their friends to do things that they do not want to. They should listen to their instinct; if it does not feel right then they should tell a trusted adult such as a parent, carer, teacher, or social worker.

It is important that we can identify the signs of internet grooming and sexual exploitation. This involves understanding the answers to the following questions:

- What does it feel like to be groomed?
- What might a friend see?
- What might sexual exploitation feel like?
- What is sexual exploitation?

What does it feel like to be groomed?

- Special/loved
- What you want
- Understood
- You have control
- New friends
- Exciting
- You've changed
- Grown up
- Sexualised conversations

What might sexual exploitation feel like?

- You owe something
- In love and no one else matters
- No going back
- Humiliated or threatened
- Scared or trapped
- You deserve it
- No-one will believe you
- Fooling yourself that it is okay
- Pressured to get friends involved
- Used

What might a friend see?

- Gifts or money
- Increased Secrecy
- Drug and alcohol misuse
- Criminal activity
- Changing appearance
- Going missing
- Self-harm
- STI's and pregnancies
- Online relationships with strangers
- Suicidal thoughts
- Injuries

What is sexual exploitation?

- Doing sexual things you find horrible
- Sexual things with an older person
- Forced to have sex with strangers
- Made to send naked pictures
- Having sex in front of others
- Rape
- Drink or drugs addiction
- Being hurt or beaten up
- Forced not to leave when you want to

Appendix 7. Key Safeguarding Contacts

Trust's Head of Skills & Safeguarding (HoSS)

01923 496256 / 07855 300439

Watford FC's Head of Safeguarding (HoS)

01923 496246 / 07876 786910

Trust Community Director

01923 496257 / 07977 987587

Police

101 or 999 in an emergency

Safeguarding Adults Board

(Hertfordshire) 0300123404 (24hrs)

Harrow Council Out of Hours

0208 424 0999

FA's Safeguarding Team (24hrs)

0800 023 2642 or safeguarding@thefa.com

FA NSPCC

0808 800 5000

Child Line

0800 1111

www.notinourcommunity.org

Protecting against grooming & sexual exploitation

Appendix 8. Departmental Designated Safeguarding Officers (DSO)

Safeguarding Leads

 Paul Clark

Safeguarding Lead (Trustees)

 Rob Smith

Community Director

01923 496257

rob.smith@watfordfc.com

 Rob Clarke

Head of Skills and Safeguarding

P 01923 496256 | **M** 07855 300439

rob.clarke@watfordfc.com

Designated Safeguarding Officers (DSO)

 Karen Stephanou

Equality, Diversity and Inclusion Strategic Lead

P 01923 496251 | **M** 07841 028229

karen.stephanou@watfordfc.com

 Rachel Tucker

Youth Engagement Officer

P 0208 421 4676 | **M** 07825 745728

rachel.tucker@watfordfc.com

 Ben Wells

School Sports Manager

P 01923 496356 | **M** 07977 183572

ben.wells@watfordfc.com

 Jodine Williams

Mental Health Project Officer (Empower)

M 07850 503447

jodine.williams@watfordfc.com

 Rebecca Chapman

Project Manager (NCS)

P 01923 496271 | **M** 07718 490618

rebecca.chapman@watfordfc.com

 Lucy Tearle

Community Projects Officer (Young People)

P 01923 496378 | **M** 07850 503446

lucy.tearle@watfordfc.com

 Kim Pearce

Head of Safeguarding (Parent Club)

P 01923 496246 | **M** 07876 786910

kim.pearce@watfordfc.com

Appendix 9. Other Applicable Club Policies

Policies

- Bullying and Harassment Policy (Employment Policy)
- Data Handling and Protection Policy
- Disciplinary Policy (Employment Policy)
- Equal Opportunities Policy (Employment Policy)
- Grievance Policy (Employment Policy)
- Health and Safety Policy
- Managing Safeguarding Allegations Against Staff Policy and Procedure
- Lone Worker Policy
- Missing Person Procedure
- Safeguarding Adults at Risk Policy & Procedures
- Whistleblowing Policy
- Recruitment and Selection Policy
- PREVENT Guidance

Relevant Legislation/Regulations:

- Care Act 2014
- Crime and Disorder Act 1998
- Data Protection Act 2018
- The Equality Act 2010
- FA Safeguarding Children Rules
- FA Respect Codes of Conduct
- Human Rights Act 1998
- Police Act 1997
- Premier League Guidance for Safer Working Practice
- Premier League Rules
- Protection of Children Act 1999
- Protection of Freedoms Act 2012
- Rehabilitation of Offenders Act 1974
- Safeguarding Vulnerable Groups Act 2006
- Sex Offenders Act 1997
- Sexual Offences Act 2003
- Youth Evidence & Crime Evidence Act 1999
- Working Together 2018
- Keeping Children Safe in Education 2020

Please note that these lists are not exhaustive.

Appendix 10. Incident Report Form

Failure to complete this form improperly could result in the Trust being unable to investigate an allegation/incident.

Name of Person Completing Form:

Contact Details:

Time & Date Incident Form Completed:

Date of Incident:

Time of Incident:

Location of the Incident: