



SAFEGUARDING ADULTS AT RISK

POLICY AND PROCEDURES

Policy Name: Safeguarding Adults at Risk Policy and Procedures

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Statement

Watford Football Club (hereafter referred to as the Club) is committed to creating opportunities for all to participate in a broad range of activities at the Club at the same time as creating a safer culture for the participants.

The Club 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.

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Principles

The Club seeks to ensure the safety and well-being of all who engage in activities with the Club. It is through the application of this policy and procedures that the Club will seek to develop a positive and proactive welfare program to enable all 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 vulnerable groups, you are automatically placed in a Relationship 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 that person's development can be significant. Football can and does have a positive effect on development; and is potentially an inspiration for all sections of our community

3 Scope

This policy is for use across the Club and is to be observed by all those working with adults at risk. The application of this policy and procedures across the Club, 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 staff and partners must make themselves aware of the Club'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 and protection at the Club is the Head of Safeguarding (HoS). The Club fully acknowledges and accepts its responsibility for the safety and well-being of those who engage in any activity carried out with the Club.

The Club has a people-orientated approach and welfare is of paramount importance. It is the duty of all staff working at the Club to safeguard the welfare of all 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 Academy
- Watford Women FC (WWFC)
- Watford FC Community Sports and Education Trust (the Trust)

The Club has a comprehensive safeguarding procedure in place to meet the requirements of The FA and Premier League Rules (Section S, the 'Safeguarding of Vulnerable Groups and Safe Recruitment').

These procedures ensure that national standards for safeguarding are met and implemented throughout the Club.

In respect of safeguarding individuals from radicalisation, the Club 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 individuals to address their specific vulnerabilities, prevent them from becoming further radicalised and possibly enter 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 Club also has a responsibility to maintain regular dialogue with the Local Safeguarding Adults Board. The Club will refer concerns that a vulnerable adult may be at risk of significant harm to Adult Social Services, the Police or in cases of suspected radicalisation to the Channel Scheme as appropriate. The Club will refer to the Local Authority Designated Officer (LADO) any incident or allegation against a person in Relationship of Trust.

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Safeguarding Strategy – Our Plan

The Club's Safeguarding Strategy document entitled "Our Plan" sets out the Club's strategic approach for the next three years to ensure that safeguarding arrangements are consistently considered, implemented, and improved.

It presents the Club's guiding vision behind Our Plan, its objectives, the actions, and measures through which outcomes will be achieved, and underpinning principles.

Our Plan acts as a framework through which all those working at or with the Club can better understand and carry out their safeguarding responsibilities, so that everyone who engages with the Club can do so in a safe environment.

Our Vision

"To keep safeguarding and welfare at the heart of our Club".

The vision behind Our Plan is to collectively promote and protect the safety and wellbeing of adults at risk across the Club, and to create a welcoming and secure environment for them in which they are supported, respected and safe.

Our Priorities

We will do this through:

- **CULTURE:** Encourage a Club-wide, shared commitment to safeguarding, ensuring that safeguarding considerations are embedded into the Club's culture and approach to all work.
- **PEOPLE:** Maintain a professional workforce made up of responsible individuals who are vigilant, proactive, and responsive in their attitude to safeguarding, and are aware of the processes for dealing with safeguarding concerns.
- **AWARENESS:** Provide safeguarding education and awareness both to those at the Club responsible for safeguarding and those at risk of harm, so that individuals are empowered to recognise, report, and speak about their concerns in a safe and supportive environment.
- **COMPLIANCE:** Actively monitor and review safeguarding arrangements, and adjust where necessary, to ensure that they are as effective as possible.
- **HORIZIONS:** Seek out and embrace new opportunities and technology that encourages any form of abuse is prevented from the outset.

Our Foundations

We will achieve the following based on our foundations:

- **DIVERSITY:** Working together within our community to deliver our safeguarding vision
- **EMPOWERMENT:** To empower all those entrusted into our care
- **EQUALITY:** Treat everyone fairly and equality without exception
- **FAMILY:** Continue to champion our reputation as the original family club
- **INCLUSION:** We are committed to creating a welcoming and inclusive environment
- **RESPECT:** Promote a safe and supportive culture
- **TOGETHER:** The Board, staff and partners acknowledge that safeguarding and welfare is everyone's responsibility

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Safeguarding Governance and Leadership

Strategic Safeguarding Group (SSG)

The Club has a Strategic Safeguarding Group (SSG) that provides clear directions and addresses all aspects of safeguarding at a strategic level. The Club has a Senior Safeguarding Lead at Board level who oversees the delivery of the safeguarding strategic plan through the Strategic Safeguarding Group.

The operational delivery of safeguarding is coordinated by the Head of Safeguarding (HoS) and is supported by the Safeguarding and Welfare Manager (S&WM), Welfare and Development Manager (W&DM) Safeguarding and Welfare Officer (S&WO), Academy Player Care and Safeguarding Officer (APCSO), Safeguarding Manager (Trust) (SMT), and Designated Safeguarding Officers (DSO)

Each lead is specifically responsible for providing localised expertise and supports the promotion and awareness-raising of safeguarding.

Safeguarding Management Group (SMG)

The Club's Safeguarding Management Group (SMG) will contribute and ensure safeguarding remains at the fore of all the Club's work. The Group has a collective responsibility to provide support to the Strategic Safeguarding Group (SSG) and all departments operationally.

The group maximises the diverse Club expertise and experience to help promote and ensure effective safeguarding, welfare, and wellbeing across the business and provide a positive influence and help foster a strong safeguarding and welfare culture within the Club.

The group works collaboratively with the Strategic Safeguarding Group (SSG) and supports the operations needs of the Club and those outline in the Safeguarding Standards framework to maintain effective communication measures and working relationships in relation to safeguarding and welfare across all the constitutes of the Club.

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Definitions

Definition of an Adult at Risk

Anyone who is aged 18 years old or above who 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.

Definition of Club

Associated football club in the membership of the English Football League (EFL). The term 'Club' includes all constituents that operate under the brand of Watford Football Club including – Watford FC Academy, Watford FC Community Sports, and Education Trust (Trust) and Watford Women Football Club (WWFC).

Definition of Safeguarding Team

The collect term for those who hold specific roles within safeguarding for the Club. These roles include, but are not exclusive, Senior Safeguarding Leads (SSL), Head of Safeguarding (HOS), Safeguarding Managers' (SM), Safeguarding Officers'(SO) and Designated Safeguarding Officers' (DSO).

Definition of Staff

Means any person employed or deployed by the Club whether paid or voluntary.

Definition Partners

Means any person or organisations whose contractual agreement requires them to comply with this safeguarding policy.

Definition of Activity or Activities

It means any activity or series of activities arranged by or in the name of the Club for adults at risk or attended by adults at risk.

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The Key Principles Underpinning this Policy are:

- It is the responsibility of all staff and partners to safeguard and promote the welfare of adults at risk. This responsibility extends to a duty of care for those adults employed, commissioned, or contracted to work with adults at risk.
- Staff and partners who work with adults at risk are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions.
- Staff and partners should work and be seen to work, in an open and transparent way.
- The same professional standards should always be applied and should be sensitive to differences expressed through culture, disability, gender, language, racial origin, religious belief and/or sexual identity.
- Staff and partners should continually monitor and review their practice and ensure they follow the guidance contained in this document.
- 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.

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Positive Culture

All staff and partners working with adults at risk should adhere to the following principles and actions:

- Always work in an open environment - avoiding private or unobserved situations and encouraging open communication.
- Make the experience of the activity fun and enjoyable.
- Promote fairness, confront, and deal with bullying.
- Treat all adults at risk 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.
- Always give enthusiastic and constructive feedback rather than negative criticism.
- 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 adult at risk is vital.
- Encourage a good listening and supportive culture
- Role model at all times by using appropriate language, behaviour, and attire

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Roles and Responsibilities

Head of Safeguarding (HOS)

The role of the Club's Head of Safeguarding is to:

- Work closely with Club's Board and Senior Safeguarding Lead (SSL) to provide clarity across the Club to ensure full compliance with the English Football League (EFL) rules, the FA safeguarding agenda and Government legislation.
- Maintain key relationships with Club's Board, Strategic Safeguarding Group (SSG), the English Football League (EFL) Safeguarding Team, Designated Safeguarding Officers, NSPCC, Police, Local Safeguarding Adult's Board, Local Authority Designated Officer (LADO) (for the management of allegations against professionals), and The FA Safeguarding Team.
- Work close with the Club's Board and Strategic Safeguarding Group (SSG) to ensure the effectiveness of the Club's safeguarding strategy; compliance and updates on current legislation and any changes in English Football League or FA Rules; or statutory agency legislative changes which impact the Club.
- Represent the Club as lead case manager when cooperating with and reporting directly to external statutory agencies such as the Police, Local Safeguarding and Adult's Board. This includes the referral of cases of suspected radicalisation to the Police or Channel Scheme.
- Responsibilities included overseeing all aspects of safeguarding and welfare across the organisation, encompassing the Men's First Team, Academy, Player Care, Watford FC Women, and the Community Trust."

Safeguarding and Welfare Manager (SWM)

The role of the Club's Safeguarding and Welfare Manager is to:

- To assist and support the Head of Safeguarding on the delivery of best practice in safeguarding and protection within the Club and ensure the highest standards for safeguarding for all vulnerable groups.
- In the absence of the Head of Safeguarding, to act as the deputy.
- Responsible for being the localised expertise for safeguarding knowledge, understanding, roles and responsibilities through regular staff training across the Academy and Watford Women FC, ensuring standards are met as required.
- Work alongside the Head of Safeguarding and other members of the Club's Safeguarding Team, promote, embed, implement, and improve the Club's safeguarding provision.
- Oversee the Club's Academy Player Care and Welfare Officer, Welfare and Safeguarding Officer (W&SO) and Academy Designated Safeguarding Officers (DSO)

Welfare and Development Manager (WDM)

The role of the Club's Welfare and Development Manager (WDM) is to:

- The welfare and development lead, liaising between First Team management staff, including coaches, medical, and performance teams.
- Managed people and welfare initiatives, including apprenticeships, intern support, host family oversight, and matchday workforce operations.
- Championed wellbeing and safeguarding, delivering campaigns and acting as a first point of contact for welfare concerns within the Club.
- Led staff development and compliance across the club, including onboarding, training plans, performance reviews, and regulatory training
- Provide day-to-day operational support to the Head of Safeguarding, ensuring strategic safeguarding goals are effectively implemented across departments.

Safeguarding Manager (Trust) (SMT)

The role of the Club's Safeguarding Manager (Trust) (SMT) is to:

- To assist and support the Head of Safeguarding on the delivery of best practice in safeguarding and protection within the Club and ensure the highest standards for safeguarding for all vulnerable groups.
- Responsible for being the localised expertise for safeguarding knowledge, understanding, roles and responsibilities through regular staff training across the Trust, ensuring standards are met as required.
- Work alongside the Head of Safeguarding and other members of the Club's Safeguarding Team, promote, embed, implement, and improve the Club's safeguarding provision.
- Oversee the Trust's Designated Safeguarding Officers (DSO)

Academy Player Care & Safeguarding Officer (APCSO)

The role of the Club's Academy Player Care and Safeguarding Officer is to:

- Overseeing and monitoring all Academy players' welfare, including mental and emotional wellbeing, providing and or sourcing the appropriate training where required for players, parents, and staff.
- With the support of the Safeguarding and Welfare Manager to develop and successfully coordinate the mechanism for engaging with players and parents to ensure we meet the welfare and safeguarding needs for all individual players aged between 8 – 21 years.

Safeguarding and Welfare Officer (SWO)

The role of the Safeguarding and Welfare Officer is to:

- Led safeguarding and welfare provision across the Foundation and Youth Development Phases of the Academy, acting as the primary point of contact for concerns and managing a wide range of cases. Provided support across the club, including Watford Women's team, and deputising for the Safeguarding and Welfare Manager as part of the wider Safeguarding Team
- Oversaw the full player welfare journey, from onboarding and personal needs assessments to ongoing development and transition support and ensuring a player-centred approach to wellbeing across the Academy environment.

Designated Safeguarding Officer (DSO)

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

- Support 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 adults at risk, staff, and partners and, if appropriate, external agencies regarding information or referral of safeguarding matters within the department.
- Ensure all incidents, concerns, allegations, evidence of poor practice are reported in confidence, and in line with Data Protection legislation using the Club's CPOMS system.
- To attend regular Club Designated Safeguarding Officer meetings with relevant personnel, and undertake any actions raised at meetings and CPD events.

10 Safer Recruitment

As part of the Club'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 two 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.

All staff and partners engaged in 'regulated activity' will be required to undergo regular DBS disclosure clearances, normally every three years or earlier if requested.

All elements of the safer recruitment process and pre-appointment checks will be applied to applicants from overseas in the same way as applicants' residents to the UK.

Overseas checks will be carried out on anyone that has lived or worked abroad in the last three years and spent more than three months outside of the UK in addition to the standard DBS check process.

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. Guidance and criteria on the filtering of these cautions and convictions can be found on the Ministry of Justice website – Guidance on the Rehabilitation of Offenders Act 1974 and the Exceptions Order 1975 - www.gov.uk/government/publications/new-guidance-on-the-rehabilitation-of-offenders-act-1974

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 adults at risk and adults at risk. If a manager believes that the appointee to a vacancy will be working in a 'regulated' or 'controlled' position, they 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 Club 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 must 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 Safeguarding and Club's HR Manager, English Football League and/or The FA and/or the Local Safeguarding Adult at risk Board Manager may be asked to attend the risk assessment meeting.

In addition, as part of the short-listing process, the Club may consider carrying out an online search for publicly available information as part of the due diligence process.

As part of the Club's ongoing commitment to ensure safeguarding remains at the heart of recruitment and the ongoing employment process, staff will be required to complete an annual staff self-declaration from those working undertaking regulated activity or regulated work with adults at risk.

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Staff Induction and Training

All staff will undertake the Club's mandatory safeguarding induction and Child Protection Online Management System (CPOMS) training as part of their induction process.

All staff will be required to complete The Premier League's online safeguarding training module plus government Prevent and ACT training as part of their induction process. Staff will be required to refresh this training every second season. In addition, staff will also receive training appropriate to their role in accordance with the Club's Training Matrix.

Those staff who hold a specific role in safeguarding will also need to undertake Statutory and Mandatory Safeguarding Training Level 3 courses, which will need to be refreshed every three years e.g. members of the Safeguarding Team and DSOs. In addition, those staff also need to hold a relevant Mental Health First Aid qualification (child or adult) aligned to the needs of the primary workforce.

Details of those who have achieved the required mandatory, and role specific training will be retained by the Head of HR and Learning and Development Officer. All recruiting leads shall be required to complete the NSPCC's Safer Recruitment for those in non-education online training,

It is impacts that all members of staff discuss the basics of standard good practice in safeguarding in their regular Professional Development Review (PDR) meeting – as it impacts their role. In addition, due to the demands placed on the Designated Safeguarding Officer 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.

12 Child Protection Online Management System (CPOMS)

Child Protection Online Management System (CPOMS) is a secure cloud-based software system used by the Club to report, record and monitor safeguarding, wellbeing and pastoral issues, as well as enabling the Club to identify trends and patterns of harm and abuse, allowing early intervention to support all our risk groups.

CPOMS is used extensively throughout the Club, and all full-time and part-time staff have access to the system, allowing them to raise and share concerns, including poor practice and confidential reporting directly with the Safeguarding Team and senior leaders.

All part-time and full-time staff are provided with induction training and a tailor-made account which features a two-factor login feature.

Staff can access the secure system via <https://wfctrust.cpoms.net/>

13 Duty of Care

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

All staff and partners 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 staff and partners must be fully aware of this Adult at Risk Safeguarding Policy and Procedures and their responsibilities.

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

Staff and partners must demonstrate integrity, maturity and good judgement whilst working with adults at risk. Any person responsible for a, whether solely or jointly, is in a relationship of trust which requires behaviour to be in accordance with this policy. Examples of positions of trust include (but are not limited to):

- Head of Department.
- Coach.
- Learning mentor/tutor.
- Physiotherapist.
- Driver.
- Facilitator.
- Staff engaged in matchday activities involving adults at risk.

14 Mental Capacity

It is not for staff to decide about whether an adult at risk lacks mental capacity in relation to the concern in question, but it is useful to understand 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 one of the Safeguarding Managers or the Head of Safeguarding (HoS).

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?

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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 considering 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 factors, then treat them as you would any other person. If you are concerned that they may not necessarily understand considering, the above factors then seek advice as stated above.

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Procedures for Gaining Consent

If concerns arise, consent must be obtained from the individual before a referral is made to the Local Adult Board or the Police. However, if others are at risk of harm the information should be passed to Local Safeguarding Adults Board 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.

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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.

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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 an acceptable and unacceptable 'touch' is.
- 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.

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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 is 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 the person responsible for any physical care that is required and how this can best be done with respect and dignity. This will usually mean the 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 the person responsible. This is best done by consulting with the person responsible and 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 behaviours that exclude any kind of physical punishment or restraint.
- Listen to and support the individual.
- Involve the person responsible wherever possible.
- This helps give everyone a voice and may act to deter abusers.

20 Third Party Working and Facility Hire

Registered companies, contractors and organisations asked to provide services in an area of the Club premises or scope of work that brings its employees into contact with children and/or adults at risk will be subject to the expectations outlined in the Club's Procurement and Contractors Safeguarding Agreement.

Registered companies, contractors and organisations hiring Club facilities e.g., Vicarage Road Stadium, Training Ground, Meriden Community Centre and Cedars Youth and Community Centre or are employed to provide activities on behalf of the Club which are regulated through the provision of teaching, training, instruction, care for or supervision of adults at risk must provide the Club with details of:

- Organisations safeguarding policy.
- Name of person responsible for the organisation's safeguarding provisions.
- Evidence of Disclosure and Barring Service checks completed for all staff, partners hirers.
- Evidence from all staff, partners and hirers have undertaken some form of safeguarding training.
- The Club will ensure that all staff and partners working with adults at risk are subject to a satisfactory Enhance DBS check and sign a self-declaration before commencing duties.
- Delivery of regulated curriculum activity, the Club will work with and adhere to the school's, college or education providers safeguarding policy and procedure as directed. If the school, college, or education establishment is unable to provide a 'fit for purpose' safeguarding policy and procedure, the Club's own policy will be used and supersede that of the school, college, or education establishment.
- The hiring of facilities outside of the school day e.g., after school provision, to provide activities which are regulated through the provision of teaching, training, instruction, care for or supervision of adults at risk the Club will adhere to their own policy and notify school, college or education establishment of any incidents, concerns or allegations made.

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Good Practice

All staff and partners working with adults at risk should adhere to the following principles and action (list is not exhaustive):

- Have access to and be familiar with the Club's safeguarding policies and procedures and relevant working documents.
- Know the Head of Safeguarding and Safeguarding Team and how to contact them.
- Put the welfare of the adult at risk first and act in their best interests
- Ensure the safety of the individuals/group in their care.
- Ensure any concerns or allegations relating to adult at risk welfare is recorded via the Club's CPOMS reporting system outlined in this policy.
- Maintain confidentiality about sensitive information.
- Help maintain an ethos whereby colleagues and person responsible feel able to raise concerns comfortably and safely, safe in the knowledge that effective action will be taken as appropriate.
- Adhere to Club's codes of conduct and ethics.
- Encourage and demonstrate consistently high standards of behaviour.
- 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.
- Request written parental consent if Club officials are required to transport adults at risk.
- Gain written consent from the person responsible for any significant travel arrangements e.g., overnight stays.
- First aider is in attendance.
- Ensure that at away events adults should not enter adults at risk room or invite individuals to their rooms.
- Maintain appropriate dress standards to promote a safe, respectful, and professional environment when working with children and adults at risk
- Secure written consent for the Club 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 and submitted to CPOMS.
- Adherent to the Club's Lone Working Policy, Lone Worker Risk Assessment, Late Collection and Missing Person Procedure.
- If groups must be supervised in changing rooms always ensure coaches etc. work in pairs.

22

Poor Practice & Abuse

This takes place whenever staff 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 Club's Disciplinary Policy, Grievance Procedure, Whistle Blowing Procedure and Harassment and Bullying Policy. An individual may not be aware that poor practice or abuse is taking place, as they may deem the behaviour '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 an adult at risk away from others.
- Being alone in changing rooms, toilet facilities or showers used by adults at risk.
- Engaging in rough, physical, or sexually provocative games, including horseplay.
- Allow or engage in inappropriate touching of any form.
- Allowing the use of inappropriate language to go unchallenged.
- Making sexually suggestive comments to an adult at risk even in fun.
- Allow allegations made by an adult at risk to go unchallenged, unrecorded, or not acted upon.
- Do things of the personal nature that the adult at risk can do for themselves.
- Engage, follow, or communicate with an adult at risk via social media on a personal basis – please refer to Club's Social Media Policy.
- 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, parents, person responsible, 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 Club's Harassment and Bullying Policy where appropriate.

23 Signs, Indicators and Forms of Poor Practice and 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 include 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 mistreatment 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 (STDs).
- 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.

24 What to do if you Receive a Safeguarding Disclosure

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

All staff and partners have a responsibility to ensure the safety and welfare of the adult 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 Club will assure all staff and partners 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 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'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.

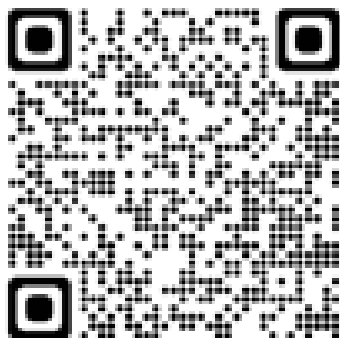
25 Reporting a Concern

If you are concerned about an individual, report the concern to Head of Safeguarding (HOS) or a member of the Safeguarding Team via the Club's CPOMS system

<https://wfctrust.cpoms.net/> or by using the secure digital form available via either the Club's or Trust websites under the 'Safeguarding' section or simply scan the QR code below

www.watfordfc.com/supporters/safeguarding

www.watfordfccsetrust.com/about-us/safeguarding/reporting/



26 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 to CPOMS system at the time of the disclosure/concern and subsequently submitted to the relevant.

Designated Safeguarding Manager's or Head of Safeguarding (HoS) who will then support and advise you through ongoing process.

Establishing the victim's wishes:

It is especially 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.

Consult with a member of the Safeguarding Team or the Head of Safeguarding, particularly if the adult states who they would prefer to talk to, the Police or their support 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 or 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 staff or partners. Report the matter to the Head of Safeguarding at the earliest opportunity. In the absence of Head of Safeguarding, contact Adult Social Care for advice and to ensure that the correct procedure is followed.

27 Safeguarding Allegations Against Staff and Partners

The Club will always take concerns and allegations about staff and partners 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 staff or partner has:

- Behave 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 an individual is unsuitable to work with adults at risk. This can include behaviour in their personal life that raises safeguarding concerns.
- The Club will always inform the police when information is received that indicates that the criminal law has been, or may have been, broken. Additionally, the Club 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 Club will work with openness and transparency with all Authorities/Agencies.
- The Head of Safeguarding will have full oversight of any allegations against staff or partners who work with adults at risk. The Club's HR Manager will also be informed at each stage of any allegation or concern. The Head of Safeguarding will hold management responsibility, and the HR Manager will hold responsibility for advising on all aspects of the HR processes.
- If the concern involves the Head of Safeguarding, then the allegation should be raised directly with either the Club's HR Manager, Legal Director or Senior Safeguarding Lead.
- 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 staff or partners 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 Club recognises that adults are at risk, and some staff and partners 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 Safeguarding will make these adjustments in consultation and agreement with the HR Manager.

28 PREVENT – Radicalisation and 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, adults at risk'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 Club ensures that all staff or partners who work with adults at risk are equipped to identify 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 adults at risk 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 member of the Safeguarding Team or Head of Safeguarding. They can contact local Prevent coordinators for help if needed. You should follow the notice, check, and 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 are.
- **Share:** you should refer to any concerns to the Head of Safeguarding or member of the Safeguarding Team.

Any concerns you have will usually be like 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 to 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.

Involuntary Celibates (Incels)

The term “*incel*” (short for *involuntary celibate*) originally referred to people—most often young men—who struggle to form romantic or sexual relationships. Over time, the label has become associated with some online communities that promote misogyny, fatalism, and extremist ideologies. These online spaces can act as echo chambers, reinforcing negative worldviews and, in some cases, contributing to radicalisation or real-world violence.

In the UK, incel-related ideology has gained increasing attention from law enforcement and safeguarding professionals. The 2021 Plymouth mass shooting, carried out by an individual with links to incel content, underscored the potential risks. While not all individuals involved in these communities are dangerous, incel culture is now recognised as a mental health and safeguarding concern—particularly for socially isolated young men.

Staff should remain alert to warning signs, including:

- Obsessive interest in “blackpill” ideology (fatalistic beliefs about attractiveness, status, and gender roles)
 - Expressions of extreme misogyny or violent fantasies
 - Social withdrawal or sudden behavioural changes
- Early, non-judgemental intervention is crucial. If you are concerned about a student, colleague, or community member, the following support routes are available:
- Prevent (UK anti-radicalisation support line): 0800 011 3764
 - ACT Early: www.actearly.uk
- Raising awareness and encouraging open, supportive conversations can help reduce stigma, build resilience, and prevent escalation into harmful behaviours.

For further guidance, please refer to the club’s document, *Everything I’ve Learnt About Incels*, which offers additional context, insights, and practical strategies for identifying and addressing incel-related risks.

29 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 Safeguarding 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.

Allegations of sexual abuse should still be reported, even if the alleged perpetrator or victim is deceased. While criminal prosecution may no longer be possible, it's important that disclosures are taken seriously. Reporting can help provide support for other victims, contribute to understanding wider patterns of abuse, and ensure organisations learn from past failures.

The Club has a duty to record and report such concerns through their safeguarding procedures. Information may be shared with the police, local authorities, or other relevant bodies to support ongoing safeguarding work. Victims or those affected should be offered emotional support, and the information can still play a vital role in improving future safeguarding practices. Support and further advice can be accessed through organisations such as NSPCC (0808 800 5000), NAPAC (National Association for People Abused in Childhood), Victim Support, or local Safeguarding Adults and Children's Board

30 Adult-on-Adult Abuse

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

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

Online adult-on-adult abuse is a 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.

31 County Lines

It often involves the exploitation of adults at risk, as gangs use minors and those with mental health or addiction problems to transport drugs, money, or weapons. 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 adult at risk adults by force or coercion. Possible signs and indicators may include:

- Lone adult which lots of comings and goings at the property some from outside of the local area.
- Individuals with multiple mobile phones or tablets or 'SIM' cards.
- An increase in anti-social behaviour around the property.
- Something an adult at risk has told you.

32 Photography, Images and Filming

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

- Before taking images, consent must be sought in writing, prior to the event or activity.
- The caregiver or person responsible must inform the Club of any change of circumstances within the season which may affect consent.
- The caregiver or person responsible will be informed of how the image will be used. The Club will not allow an image to be used for something other than that for which it was initially agreed.
- All those that are featured in Club publications will be appropriately dressed.
- If possible, the image will focus on the activity taking place and not on a specific adult at risk.
- Where appropriate, images will represent the broad range of people participating safely in the event.
- Club photographers will, where applicable, undertake an enhanced DBS check and complete the Premier League's Safeguarding Online Training module; 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. Club 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 Club document.
- No images of individuals featured in Club publications will be accompanied by personal details such as their home address.
- Recordings of adults at risk for legitimate reasons, i.e., recorded events and will be filmed by the Club officials and stored safely and securely on Club premises.
- Any instances of inappropriate images in football should be reported to the Head of Safeguarding or a member of the Safeguarding Team.
- The Club does not put adults at risk profiles with images and personal information on its website or social media.
- Images must not be taken, stored, or shared on personal devices, i.e., mobile phones, tablets etc.

33 E-Safety

E-safety guidance is designed to protect adults at risk who are supported by the 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 Club. The separate guidance is designed to provide staff with the overarching principles that guide our approach to E-safety.

This can be found on the Club's intranet under HR forms. To ensure as a Club that we work in line with our values, and within the law, in terms of how we use information technology and behave online.

Child Sexual Abuse Materials (CSAM)

In accordance with the Online Safety Act 2023, the Club is committed to preventing the presence and spread of Child Sexual Abuse Material (CSAM) across its platforms and services. We have a legal duty to assess and mitigate risks, implement robust detection and reporting systems, and cooperate fully with law enforcement, including reporting any CSAM to the National Crime Agency (NCA)

34 Social Networking Guidance

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

35

Communication

The following guidance is provided to support and manage safeguarding responsibilities effectively. It aims to ensure adults in a relationship of trust are not subjected to improper communications or improper allegations.

- Written informed consent needs to be obtained before communicating with an adult at risk.
- Signed consent needs to be obtained before using any methods of communication.
- Staff or partners are not permitted to communicate with adults at risk or the person responsible for usage of their own personal devices or accounts, this includes sharing of any personal contact information.
- Do not text or email for personal conversation, sending pictures, jokes, or other items of a personal nature.
- Only use group texts or emails and always copy in caregiver or person responsible or the designated member of the club to all communications with adults at risk. Never share any personal information with others, i.e. contact information.
- Make sure texts or emails are only in relation to specific club-related activities. e.g. informing about changes in travel arrangements, timings, or signposting.
- Report to a member of the Safeguarding Team any instance(s) where you have received any inappropriate communications from an adult at risk or person responsible. Either the Head of Safeguarding or a member of the Safeguarding Team will then agree about what action the Club will take, notifying the person responsible and any other appropriate individuals or agencies.
- Do not response to direct messages from an adult at risk. Never engage in one-to-one messaging, always includes the person responsible and/or appropriate member of staff.
- Do not respond to emails from an adult at risk other than those directly related to Club matters without including the person responsible or appropriate person within the Club.
- Advise Head of Safeguarding or member of the Safeguarding Team if you receive any non-club related communications and do not delete any messages, images, or data.

36 Lone Working and One-to-One Situations

A lone worker, for the purpose of this Policy, is defined as a member of staff or a partner who is engaged in activities which place them in a situation without direct contact with other staff or partner staff or without direct supervision. It is the staff or partner staff's responsibility to:

- Work in an open and transparent way and avoid conduct which could raise concerns. Under no circumstances should staff and agency staff visit adults at risk in their homes outside the agreed work arrangements. Nor should they invite adults at risk to their own home or to that of a family member, colleague, or friend.
 - Ensure that contact by whatever means and meetings with an adult at risk outside agreed working arrangements never take place without the knowledge and agreement of the Club.
 - Please see separate Lone Worker Policy and Risk Assessment documents.
-

37 Supervision Ratios

Staff and partners are expected to provide appropriate supervision of the adults at risk in their care at all times. The level of supervision required will vary between activities. Ratios for each activity should be determined by taking the following into consideration: The needs, abilities, and behaviour of those participating.

- The competence and experience of staff and partners involved.
- The nature and duration of the activity.
- Risk assessments and/or intelligence identifying potential behavioural or other issues and risks.
- Staff and partners must work with the Club when planning activities to ensure that appropriate ratios and supervision arrangements are carefully considered.
- The Club to the given guidance supplied by national agencies and national governing bodies in with the recommendation supervision ratios.

38 Confidentiality

Staff and Partners may have access to confidential information about adults at risk in order to undertake their responsibilities. In some circumstances, staff and partners may be given highly sensitive or private information. They should never use confidential or personal information about an adult at risk or their family for their own or others' advantage. Information must never be used to intimidate, humiliate, or embarrass the individual.

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 identity does not need to be disclosed, the information should be used anonymously.

There are some circumstances in which staff or partner 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 a member of staff or partner is in any doubt about whether to share information or keep it confidential, they should seek guidance from the Club's Head of Safeguarding or a member of the Safeguarding Team. Any media or legal enquiries should in the first instance be referred to the Club's Head of Communication and Media Relations. The storing and processing of personal information about an adult at risk is governed by the Data Protection Act, 2018. For further information on the Club's (and your) obligations under the Data Protection Act 2018, please see the Club's data handling policies and procedures, available on the Club's intranet. This means employees, workers, consultants, agency staff and volunteers:

- Are expected to treat information they receive about an adult at risk in a discreet and confidential manner.
- You should seek advice from the Head of Safeguarding if they are in any doubt about sharing information they hold, or which has been requested of them.

39 Matchday Attendance

The Club reserves the right to refuse admission to the ground based on the individual's capability to remain safe at all times whilst attending events at Vicarage Road Stadium.

For those who require personal support in order to attend maybe subject to a Personal Emergency Evacuation Plan (PEEP) to provide the adult at risk with information you need about the emergency evacuation procedures and additional support they may require.

If a situation occurs where an adult at risk who has been identified by the Club as requiring a PEEP enters the stadium without personal assistance, the Club will:

- Contact a responsible adult to either attend the game with the adult at risk or as an emergency measure, assign a personal assistant to the individual.
- The Club's responsibility towards that adult at risk begins as that individual enters the stadium and ends when the adult at risk leaves the stadium.
- If an unaccompanied adult at risk is left unattended at a game or is found in the stadium alone, the welfare and safety of that adult must be protected, and the Deputy Safety Officer needs to be alerted of the situation and the correct procedures carried out. The Matchday Safeguarding Lead is the Head of Safety and Security.

Further details outlining the Club's Ticketing term and conditions for home, away and season ticket purchases along with our consent form can be found at <http://www.tickets.watfordfc.com>

Appendices

Appendix 1.

Signs and Indicators of Abuse

Appendix 2.

What to Do if You Receive a Safeguarding Disclosure

Appendix 3.

Dealing With Concerns in a Football Setting

Appendix 4.

DBS Assessment Procedure

Appendix 5.

Managing Allegations Against Staff and Partners

Appendix 6.

Internet Grooming

Appendix 7.

Safeguarding Structure

Appendix 8.

Key Safeguarding Contacts

Appendix 9.

Strategic Safeguarding Group (SSG)

Appendix 10.

Safeguarding Management Group (SMG)

Appendix 11.

Club Designated Safeguarding Officers (DSO)

Appendix 12.

Academy Designated Safeguarding Officers (DSO)

Appendix 13.

Trust Designated Safeguarding Officers (DSO)

Appendix 14.

Other Applicable Policies and Legislation

Appendix 15.

Incident Reporting Form

Appendix 1. Signs and 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 has said.
- Physical signs of abuse.

The signs may vary according to the age and understanding of the adults 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 '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 focus on one ideology. They express a desire/ intent to take part in or support extremist activity. Their views become increasingly extreme regarding one 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 who may be at risk.**

YOU MUST:

- Put your own feelings aside and listen as if the information is not sensational.
- Allow the individual to lead the discussion and to talk freely.
- Listen to what the individual 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 individual stops talking for a while – silences are OK. You do not have to rush to fill in the gaps.
- Accept what the individual says without challenge.
- Listen to the individual without investigating.
- Allow the individual to talk but protect them from sharing the information with too many other people.
- Provide reassurance that you are taking them seriously.
- Let the individual 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 individual feel guilty or inadequate.
- If physical abuse has taken place, you may observe visible bruises and marks but do not ask an individual to remove or adjust their clothing to see them.
- Tell the individual who you will be contacting e.g., the Head of Safeguarding statutory agencies etc., 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.
- **Use the ‘TED’ method – Tell me. Explain to me. Describe to me.**
- 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 individual 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 individual if they have not initiated the contact. They may be upset by physical contact.

Stage 2

Once the immediate comfort and safety of the adult at risk is secured, you must inform the Head of Safeguarding or member of the Safeguarding Team of the disclosure. You may make a referral directly to a statutory agency if you are concerned about the adult's immediate safety and/or are having difficulty contacting either the Head of Safeguarding or if the Head of Safeguarding is the alleged abuser to contact a member of the Safeguarding Team. 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 report the concern or incident 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 report your concern via the Club's CPOMS system or by scanning the QR code below and completing an online referral. Make sure the report is clear and concise; additional information can be added later.

- When? Date and time of the disclosure or incident.
- Where? Location of where the disclosure was made, or incident took place.
- What? A brief description of what happened/disclosed.
- Who? Victim; alleged perpetrator; witnesses; other members of staff
- Actions taken? Who has been informed – Care Giver; Police; Line Manager.

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 information rather than your assumption or interpretation. Please follow the guidance provided by the online reporting form –

www.watfordfc.com/supporters/safeguarding.



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 Head of Safeguarding or a member of the Safeguarding Team if there is an immediate concern. Staff must report the incident within eight hours. 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 Head of Safeguarding 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 an adult at risk may say something about a possible abusive situation.

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 a lead person anonymously by a person or person who does not want to be directly involved for whatever reason.

However, if 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's Services, English Football League, or The FA if deemed as appropriate by the Head of Safeguarding. Any referral to an external agency shall also be reported to the Senior Safeguarding Lead.

Remember the adult at risk's welfare is of paramount importance.

Safeguarding Procedures

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

The Club encourages all staff and partners to raise concerns they may have about any safeguarding poor practice or abuse as early as possible to the relevant personnel. The Club will respond accordingly to promote a safer environment.

If you have any questions regarding this section of the Adults at Risk Safeguarding Policy and Procedures, please contact the Head of Safeguarding.

Process for Raising a Concern

How do I raise concern? You do not need to have firm evidence before raising 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 Safeguarding Team via the Club's Child Protection Online Management System (CPOMS) or alternatively, concerns can be raised via the online reporting form using the QR code shown below.

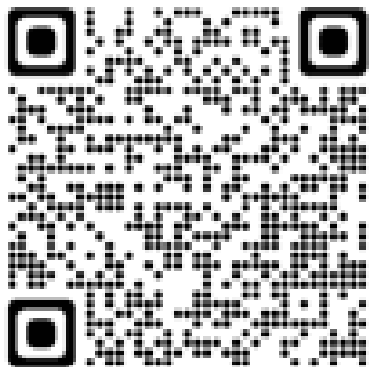
Stage 2

If you feel unable to raise the matter with a member of the Safeguarding Team for whatever reason, raise the matter directly with the Head of Safeguarding.

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 Club's Confidential Reporting Procedure.

Steps will then be taken to fully investigate the matter to decide what appropriate action should be taken. The Club 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 nominated lead or directly with the Head of Safeguarding.
- 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 nominated safeguarding lead, member of the Safeguarding Team or Head of Safeguarding. If you cannot reach them, contact your line manager, you should also consider contacting local authorities. For example, the Police or local adult services.

RECORD

- You should also make sure you make a note of any disclosure so that this can be recorded on the Club's secure Child Protection Online Management System (CPOMS) or via **watfordfc.com/supporters/safeguarding** or use the QR code below:



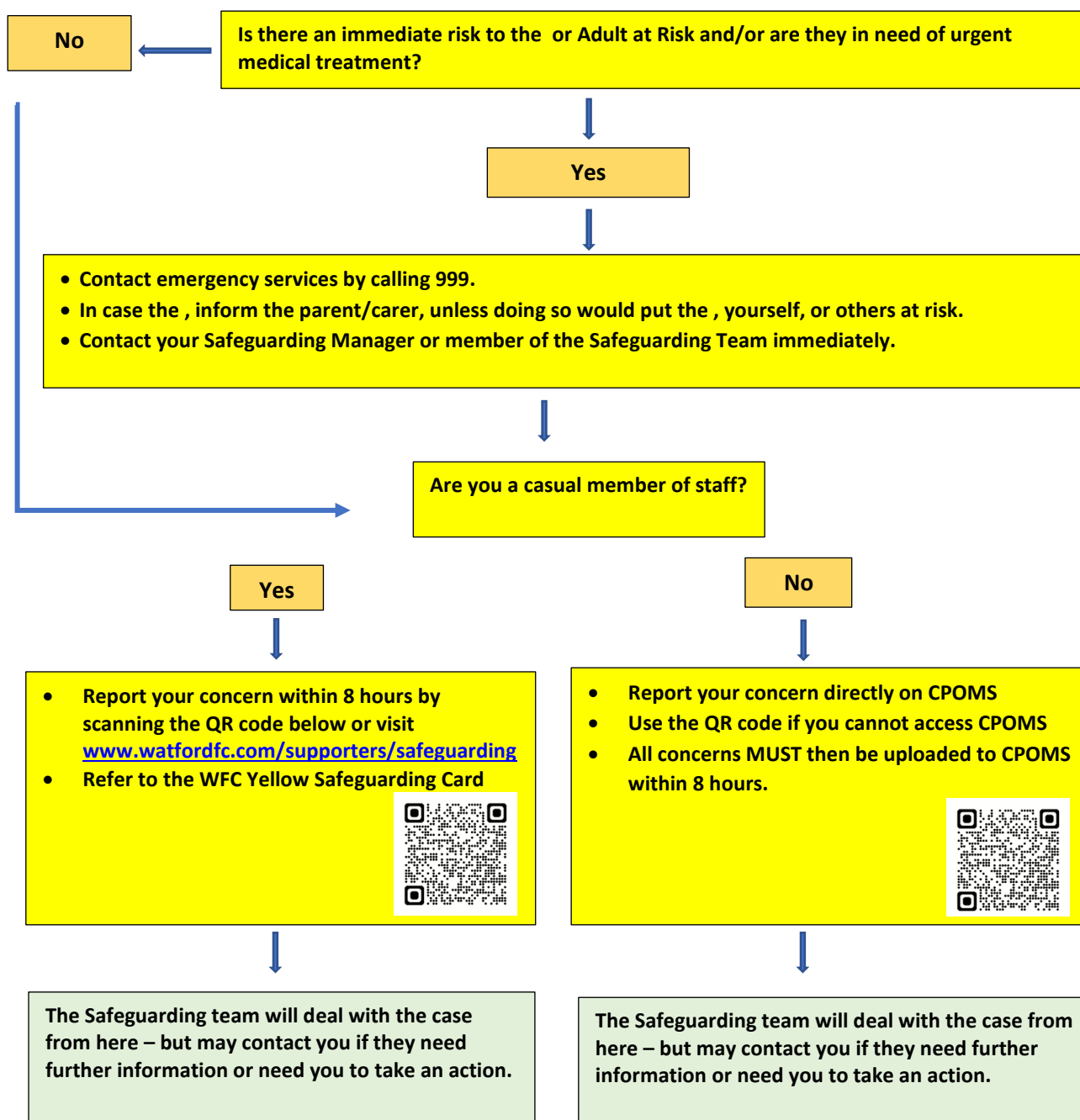
RESPECT

- 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 adult at risk.

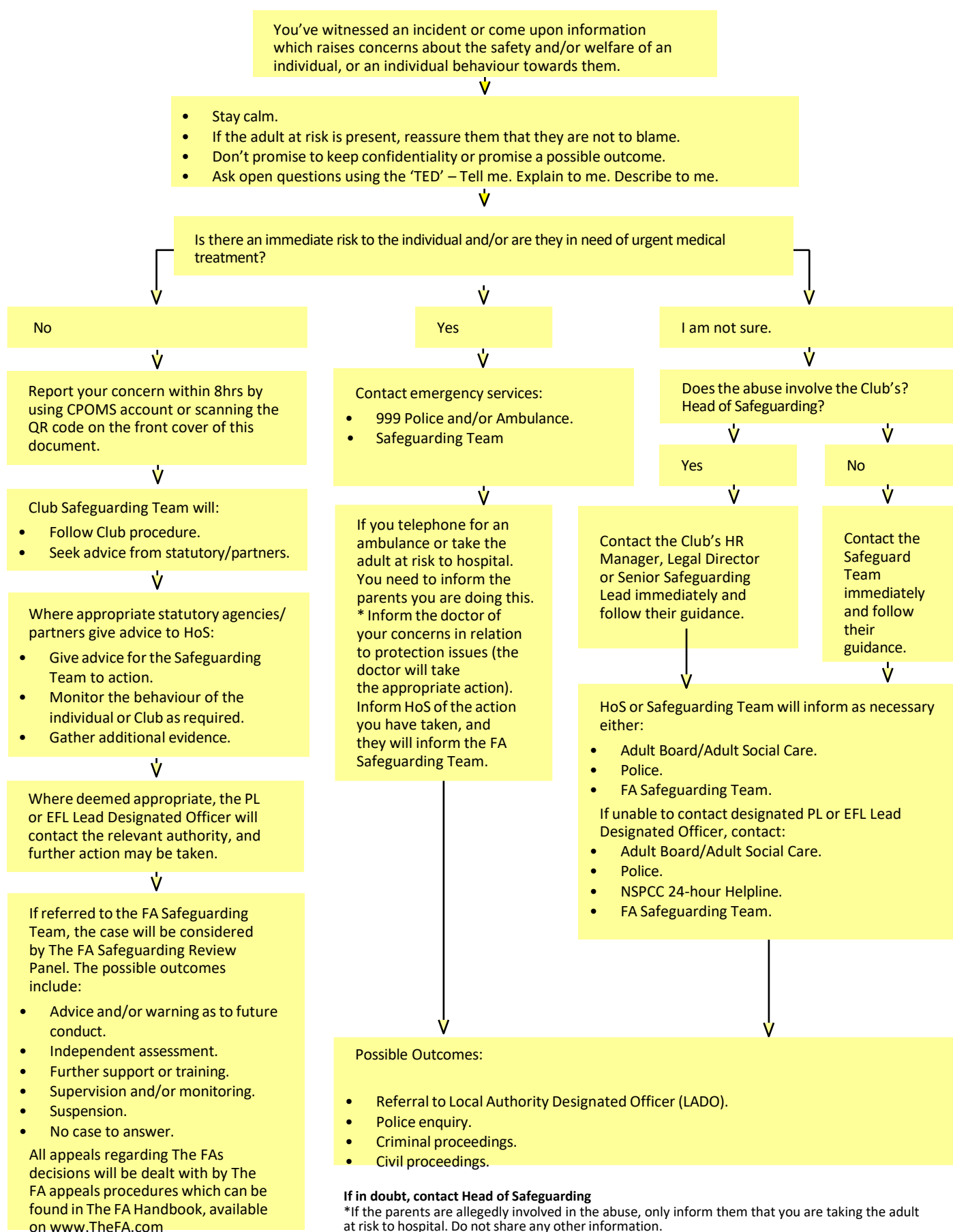
Appendix 3. How To Report a Safeguarding Concern

You've witnessed an incident or come upon information which raises concerns about the safety and/or welfare of a or Adult at Risk, or an Individuals behaviour towards them.

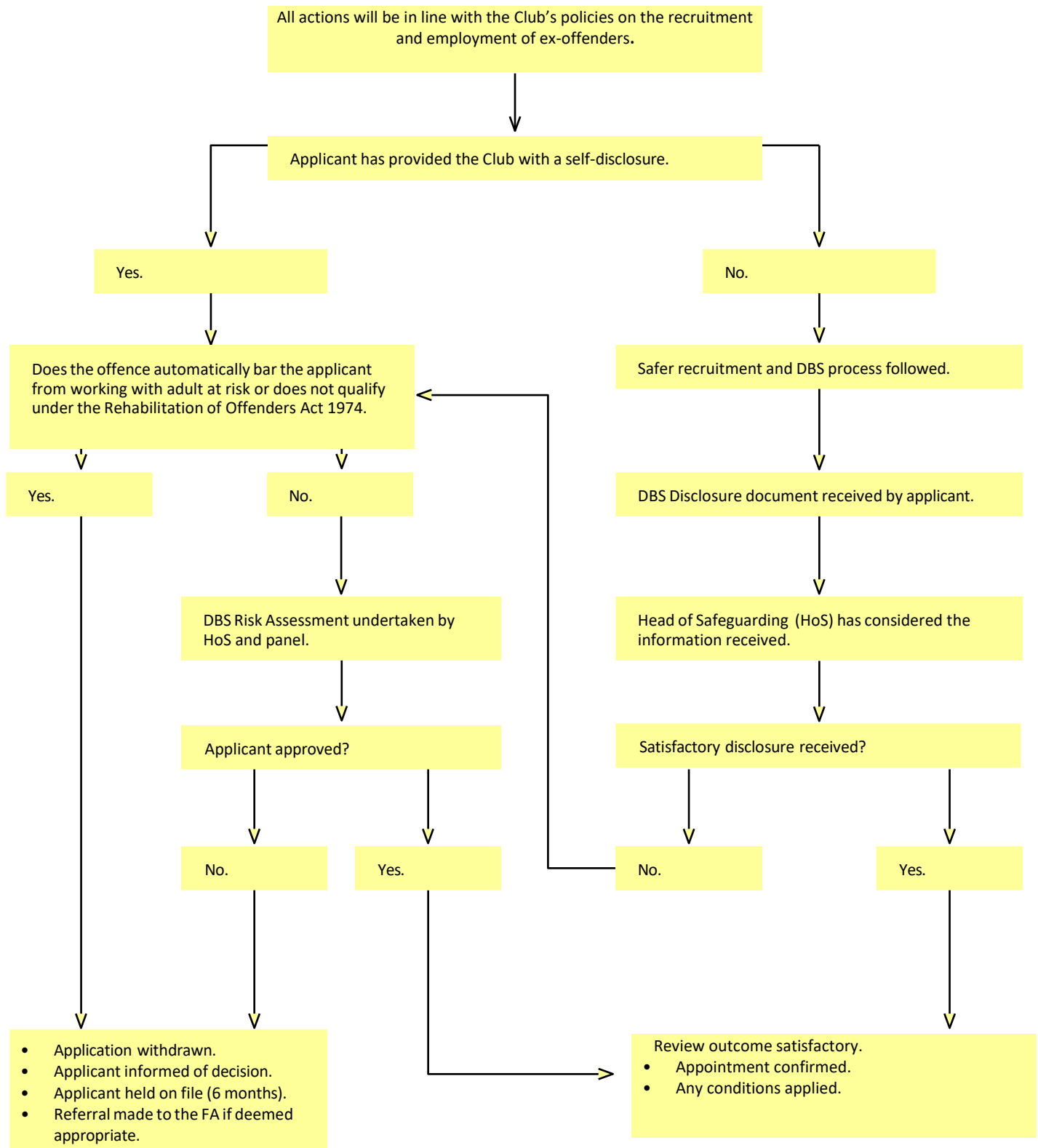
- Stay calm.
- If the individual is present, reassure them that they are not to blame,
- Don't promise to keep confidentiality or promise a possible outcome,
- Ask open questions by using TED – Tell me. Explain to me. Describe to me



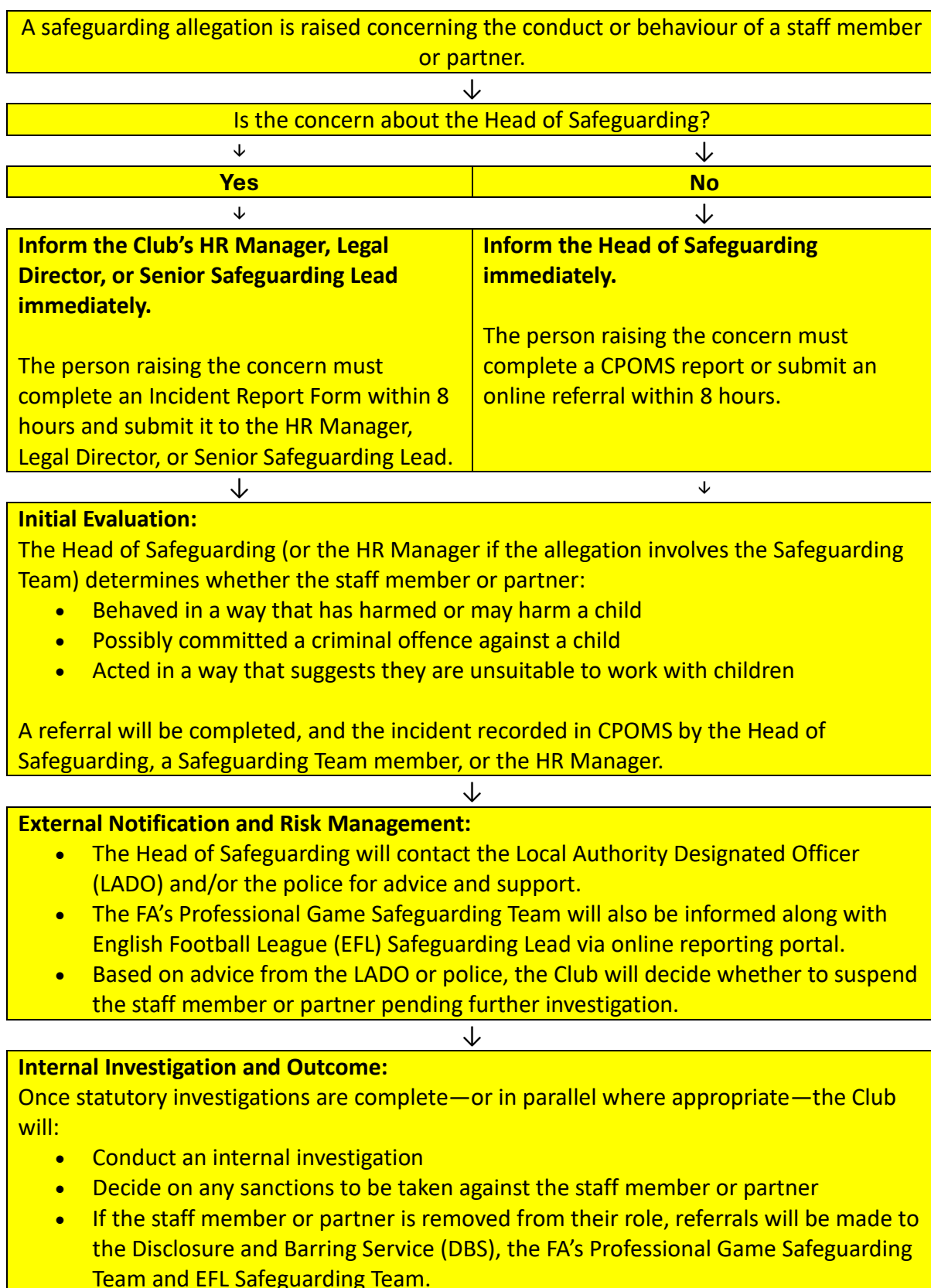
Appendix 3. Dealing With Concerns in a Football Setting



Appendix 4. DBS Assessment Procedure



Appendix 5. Managing Allegations Against Staff and Partners



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 care giver, health, or care worker.

It is important that we 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

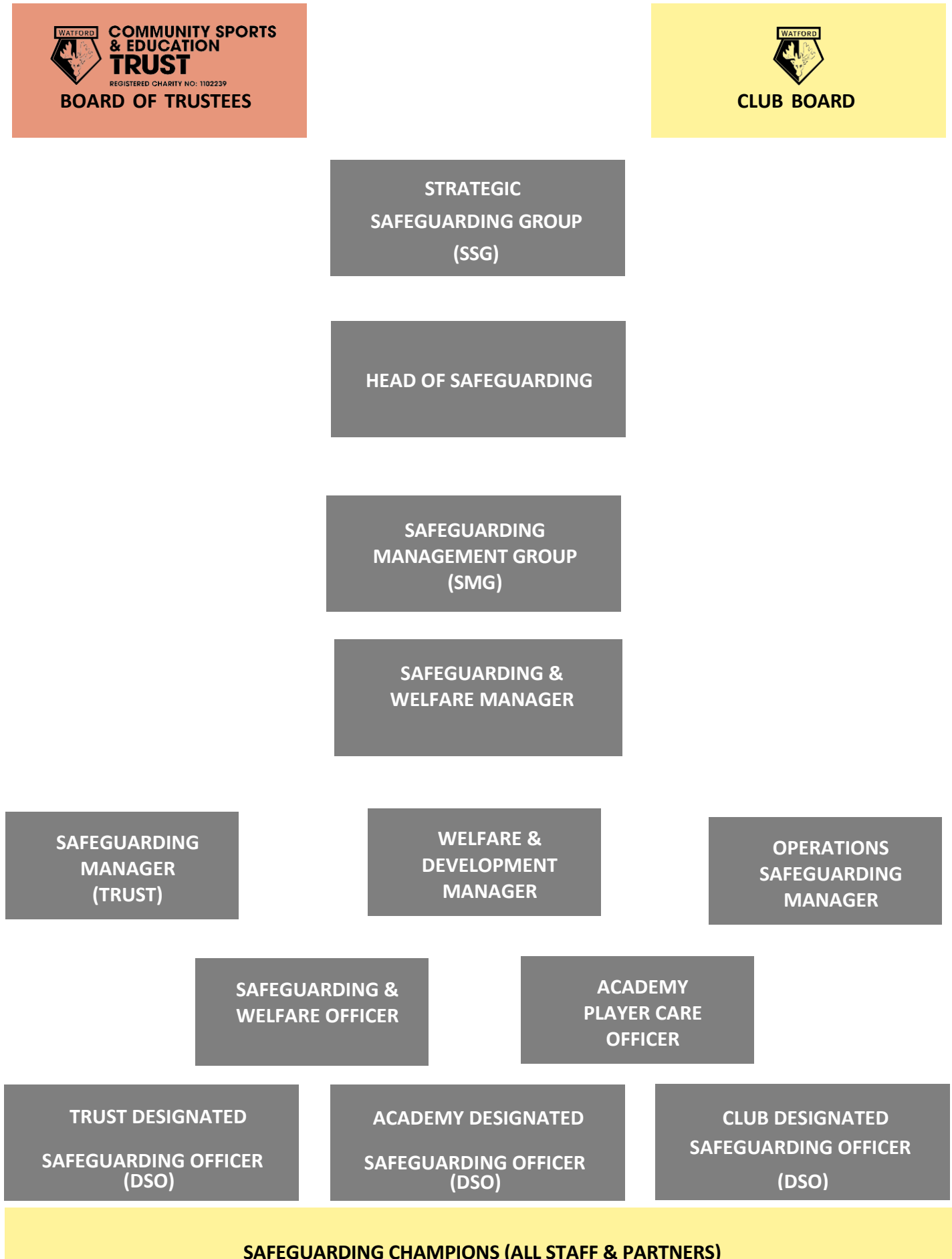
What might a friend see?

- 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. Safeguarding Structure



Appendix 8. Key Safeguarding Contacts

Head of Safeguarding (HOS)

01923 496256 // 07855 300439

Safeguarding and Welfare Manager (SWM)

07718 492050

Welfare and Development Manager (WDM)

07784228546

Safeguarding Manager (Trust) (SMT)

07761 037305

Head of Safety and Security (HoSS)

07707 289044

Academy Player Care and Safeguarding Officer (APCSO)

07964 082163

Safeguarding and Welfare Officer (WSO)

07876 786910

Police

101 or 999 in an emergency

English Football League Safeguarding Team

01772 325490 // safeguarding@efl.com

Premier League Safeguarding Team

0207 864 9000 // safeguarding@premierleague.com

FA's Safeguarding Team (24hrs)

0844 980 8200 // safeguarding@thefa.com

www.notinourcommunity.org

Protecting against grooming and sexual exploitation

www.watfordfc.com/supporters/safeguarding

Online reporting

We - Watford Welcomes

Report discriminatory abuse, anti-social behaviour, and safeguarding concerns on matchday. Text 'We' followed by details to 66777.

Appendix 9. Strategic Safeguarding Group (SSG)

Safeguarding Board Leads

 **Scott Duxbury**

Chairman and CEO

 **Professor Stuart Timperley**

*Non-Executive Director
Senior Safeguarding Lead*

 **David Fransen**

Non-Executive Director

Strategic Safeguarding Group (SSG) Members

 **To be appointed**

TBC

tbc@watfordfc.com

 **Richard Johnson**

Academy Director

richard.johnson@watfordfc.com

 **Iain Taker**

Legal Director

iain.taker@watfordfc.com

 **Rob Clarke**

Head of Safeguarding

rob.clarke@watfordfc.com


 **Ian Pope**

Operations and Facilities Director

ian.pope@watfordfc.com

 **Professor Stuart Timperley**

*Non-Executive Director and
Senior Safeguarding Lead*

 **Rob Smith**

Community Director

(Watford FC CSE Trust)

rob.smith@watfordfc.com

 **Rosemary Inskipp**

Safeguarding Trustee

(Watford FC CSE Trust)

 **Steve Alexander**

Head of Business Services

(Watford FC CSE Trust)

steve.alexander@watfordfc.com

Appendix 10. Safeguarding Management Group (SMG)

Safeguarding Management Group (SMG) Members

 Rob Clarke

Head of Safeguarding

rob.clarke@watfordfc.com

 Rebecca McDermott

Safeguarding and Welfare Manager

rebecca.mcdermott@watfordfc.com

 To be appointed

Safeguarding Manager (Trust)

tbc@watfordfc.com

 Anne-Marie Burn

Welfare and Development Manager

annemarie.burn@watfordfc.com

 Nathan Jopp

Academy Player Care & Safeguarding Officer

nathan.jopp@watfordfc.com

 To be appointed

Safeguarding and Welfare Officer

tbc@watfordfc.com

 Steve Alexander

Head of Business Services (Trust)

steve.alexander@watfordfc.com

Appendix 11. Club's Designated Safeguarding Officers (DSO)

Safeguarding Lead

 Rob Clarke

Head of Safeguarding

rob.clarke@watfordfc.com

Designated Safeguarding Officers (DSO)

 Alex Ashby

Hospitality & Events Manager

alex.ashby@watfordfc.com

 Dave Messenger

Equality, Diversity, and Inclusion Lead

dave.messenger@watfordfc.com

 Ben Holt

Retail Operations Manager

ben.holt@watfordfc.com

 Dave Newman

Ticket and Supporter Services Manager

dave.newman@watfordfc.com

 Dan Palmer

Senior Content Editor

daniel.palmer@watfordfc.com

Appendix 12. Academy Designated Safeguarding Officers

Safeguarding Lead

 **Rebecca McDermott**

Safeguarding & Welfare Manager

rebecca.mcdermott@watfordfc.com

Designated Safeguarding Officers (DSO)

 **Andrew Griffiths**

Academy Head of Education

andrew.griffiths@watfordfc.com

 **Micah Hyde**

Academy Head of Coaching

jimmy.gilligan@watfordfc.com

 **Brent Dickinson**

Academy Head of Performance

brent.dickinson@watfordfc.com

 **Michael Cook**

Academy Operations

michael.cook@watfordfc.com

 **Nathan Jopp**

Academy Player Care & Safeguarding Officer

nathan.jopp@watfordfc.com

 **To be appointed**

Safeguarding and Welfare Officer

tbc@watfordfc.com

Appendix 13. Trust Designated Safeguarding Officers

Safeguarding Lead

 To be appointed

Safeguarding Manager (Trust)

tbc@watfordfc.com

Designated Safeguarding Officers (DSO)

 Caoimhe Walker

Youth Health and Wellbeing Officer

caoimhe.walker@watfordfc.com

 Michael Williams

Premier League Kicks Manager

michael.williams@watfordfc.com

 Madeline Hurley

EDI Officer

madeline.hurley@watfordfc.com

 Lucy Tearle

Community Projects Manager (Young People)

lucy.tearle@watfordfc.com

 Ines Perreira

Youth Health & Wellbeing Officer

ines.perreira@watfordfc.com

 Paul Palmer

Business Support Officer

paul.palmer@watfordfc.com

 Nicola Burton

Schools Sports Project Officer

nicola.burton@watfordfc.com

 Joe Pizans

Cedars Community Centre Manager

joe.pizans@watfordfc.com

 Laura Figg

Higher Education - Strategic Lead

laura.figg@watfordfc.com

 Elliot Bird

Youth Engagement Officer

elliott.bird@watfordfc.com

Appendix 14. Other Applicable Policies and Legislation

Relevant Legislation/Regulations:

- Care Act 2014
- The Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- Equality Act 2010
- The Human Rights Act 1998
- GDPR and Data Protection Act 2018
- Online Safety Act 2023

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 and Partners Policy and Procedure
- Lone Worker Policy
- Missing Person Procedure
- Safeguarding Adults at Risk Policy & Procedures
- Whistleblowing Policy
- Recruitment and Selection Policy
- PREVENT Guidance

Please note that these lists are not exhaustive.

Appendix 15. Incident Report Form



In the event of not being able to:

- Access the Club's CPOMS system or.
- Scan the QR opposite or.
- Report via www.watfordfc.com/supporters/safeguarding; this form can be used and emailed directly to the Head of Safeguarding or another appropriate member of the Safeguarding Team.
- Failure to complete this form properly could result in the Club being unable to investigate an allegation/incident.

If you have a safeguarding concern, please complete this form.

(All fields are mandatory to complete)

Name of, young person, or adult at risk:

Date of Birth:

(Individual you are raising the concern on
behalf of – if known)

Your Name

Your Email

Your Contact Number

How are you connected to the individual?

When did the incident occur?

Time of the incident

Where did the incident occur (location)?

Please give a description of what has happened/disclosed?

Who was involved (this may include alleged perpetrator(s) and/or additional person(s) harmed)?

Who was the incident reported to (if anyone)?

What actions were taken (if any)?

Is there anything else you wish to share?

Once completed, please return this form to the Head of Safeguarding or an appropriate member of the Safeguarding Team